

**THE SCHOOL DISTRICT OF STURGEON BAY**  
**Regular Board of Education Meeting**  
**Wednesday, August 21, 2024**

*As noted in Board Policy 0166 - Agenda, each agenda shall contain the following statement "This meeting is a meeting of the Board of Education in public for the purpose of conducting the School District's business and is not to be considered a public hearing. There is a time for public comment during the meeting as indicated in the agenda."*

5:15 P.M.      Work Session

High School Library (IMC)

*Note: The Board typically has a work session prior to the August Board meeting to review budgetary matters again between the preliminary approval which occurs in June and formal approval which occurs in October, following the October 15 aide certification from the State. No formal action is taken in these work sessions.*

**CALL TO ORDER:**

1. Roll Call
2. Motion to Adopt Agenda

**OPERATIONS**

1. Budget planning for 2024-2025 and Beyond Discussion
  2. Adjourn
- 

6:00 P.M.      Board of Education Meeting

Sturgeon Bay High School Library

**CALL TO ORDER:**

1. Pledge of Allegiance
2. Roll Call
3. Motion to Adopt Agenda

**PUBLIC COMMENT SECTION**—*As noted in Board Policy 0167.3 Public Comment at Board Meetings:*

*Individuals who wish to address the Board should be residents of the School District of Sturgeon Bay or parents of students open-enrolled into the district. Speakers are asked to share their name, address, and be aware that comments may be limited to three minutes at the discretion of the Board President.*

**CONSENT AGENDA:**

1. Approve Minutes [See attachment](#)
  - a. Regular Meeting of July 17, 2024
2. Approve July Bills [See attachment](#)
3. Accept Grants and Donations
4. Approve Resignations and Retirements [See attachment](#)
5. Second Reading Title IX Policy [See attachment](#)

## **OPERATIONS AGENDA:**

1. Consent Agenda items requiring attention (if any)
2. Approve Sixth Grade Science Teacher [See attachment](#)
3. Approve Teacher Associates
4. Approve High School Coaching Positions (Head Softball Coach, Assistant Football) [See attachment](#)
5. Approve Middle School Coaching Positions (Football, Volleyball)
6. Approve Strategic Action Plan for 2024-2025 [See attachment](#)
7. Pupil Nondiscrimination Self-Evaluation Process Update, Report and Public Notice (informational item) [See attachment](#)
8. Reports:
  - a. Legislative
  - b. CESA
  - c. Committee/Seminars
  - d. Business Manager
  - e. Superintendent [See attachment](#)
9. Adjourn

*NOTE: This notice may be supplemented with additions to the agenda that come to the attention of the board prior to the meeting. If there are changes, a final agenda will be posted and provided to the media no later than 24 hours prior to the meeting or no later than 2 hours prior to the meeting in the event of an emergency.*

To: Board of Education  
From: Dan Tjernagel & Ann DeMeuse  
Date: August 13, 2024  
RE: Background Information for the August 21, 2024, Meetings

**5:15 P.M. Work Session**

**Sturgeon Bay High School Library**

*Note: The Board typically has a work session prior to the August Board meeting to review budgetary matters again between the preliminary approval which occurs in June and formal approval which occurs in October, following the October 15 aide certification from the State. No formal action is taken in these work sessions.*

**CALL TO ORDER:**

1. Roll Call
2. Motion to Adopt Agenda

**OPERATIONS**

**1. Budget planning for 2024-2025 and Beyond Discussion**

Business Manager Holtz will walk the Board through pertinent budget-related information. As a quick reminder, formal budget adoption and the approval of the tax levy occurs in the October 23 Board meeting after we receive the formal aide certification information from the state on or about October 15.

**2. Adjourn**

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**6:00 P.M. Board of Education Meeting**

**Sturgeon Bay High School Library**

**CALL TO ORDER:**

1. Pledge of Allegiance
2. Roll Call
3. Motion to Adopt Agenda

**PUBLIC COMMENT SECTION**—*As noted in Board Policy 0167.3 Public Comment at Board Meetings: Individuals who wish to address the Board should be residents of the School District of Sturgeon Bay or parents of students open-enrolled into the district. Speakers are asked to share their name, address, and be aware that comments may be limited to three minutes at the discretion of the Board President.*

**CONSENT AGENDA:**

**1. Approve Minutes**

- A. Regular Meeting of July 17, 2024 [See attachment](#)

**2. Approve July Bills [See attachment](#)**

**3. Grants and Donations**

- \$22.40 Chuck Schommer for Clipper Clays
- Elementary Playground
  - \$1,000 Ellsworth and Carla Peterson
  - \$1,000 Healthy Way Market

Thank you to these groups and the individuals associated with them for their generosity.

4. **Resignations and Retirements** – Emily Orns is resigning from her HOSA Advisor, Service-Learning Coordinator and High School Health and Wellness positions. Kayla Derber is resigning from her associate position in the Safe Harbor room. Amber Peters is resigning from her Sixth Grade Science Teaching position. [See attachment](#)

We thank these individuals for their service and wish them well in their next adventures.

5. **Second Reading Title IX Policy** [See attachment](#)

A motion to approve the consent agenda items as presented is recommended.

### **OPERATIONS AGENDA:**

1. Consent Agenda items requiring attention (if any)  
*This is a standing agenda item and utilized only if needed.*

2. **Approve Sixth Grade Science Teacher**

Kylie Neinas: Principal Smullen recommends Kylie Neinas for the 6<sup>th</sup> Grade Science Teaching position. Kylie graduated from UW Stevens Point in 2024 with teaching degree in Early Childhood and Elementary Ed. Ms. Neinas is from Forestville and attended Southern Door School District. She loves hiking, is a huge baseball fan (especially following Kolberg in County League Ball). Ms. Neinas looks forward to building relationships with her peers and getting her teaching career started here at SBSD.

A motion to approve Kylie Neinas as the Sixth Grade Science Teacher beginning with the 2024-2025 school year is anticipated.

3. **Approve Teacher Associates**

- A. Kathleen Riemer: 4K Teacher Associate as Sawyer Elementary School**

Principal Katy DeVillers is pleased to recommend Kathleen Riemer for a 4K Teacher Associate Position at Sawyer Elementary School starting in the 2024-2025 school year. Kathleen has a bachelor's degree in Special Education. She has worked as a special education teacher in both the Southern Door and Two Rivers School Districts. Currently, she is a Program Manager and works with special needs clients on creating and implementing their personal care plans. Kathleen is also active in the Girls Scouts of Wisconsin as a Membership and Outreach Program Director. Kathleen's work experience demonstrates her great passion for serving others. This will serve her well in her new role supporting our district's youngest learners. We are looking forward to Kathleen joining our team at Sawyer and congratulate her on her new position!

A motion to approve Kathleen Riemer as a 4K Teacher Associate at Sawyer Elementary School beginning with the 2024-2025 school year is recommended.

- B. Tydriana Duerst: Special Education Teacher Associate**

Director of Special Education and Pupil Services, Lindsay Ferry and Principal Mark



Smullen are pleased to recommend Tydriana Duerst for the special education teacher associate position at TJ Walker Middle School. Tydriana will be earning her associate's degree from NWTC in special education in December and is eager to bring her classroom learning into practice. Tydriana has been employed at PATH the last two years where she has worked with students with disabilities. Tydriana is patient, compassionate, and energetic about students and will no doubt be a great addition to the TJ Walker Middle School Team.

A motion to approve Tydriana Duerst as a Special Education Teacher Associate beginning with the 2024-2025 school year is recommended.

**C. Kaley Torbeck: Special Education Teacher Associate**

Director of Special Education and Pupil Services, Lindsay Ferry and Principal Mark Smullen are pleased to recommend Kaley Torbeck for the special education teacher associate position at TJ Walker Middle School in the ID/Autism program. Kaley has worked with children her entire life via her mother's in-home daycare and now commercial daycare. Kaley has also partnered with the Boys and Girls Club of Sturgeon Bay where she supported children as they entered the club each day. Kaley enjoys connecting with children and is looking forward to being a part of the Sturgeon Bay School District. Welcome Kaley!

A motion to approve Kaley Torbeck as Special Education Teacher Associate beginning with the 2024-2025 school year is recommended.

**4. Approve High School Coaching Positions**

- A. Head Softball Coach: Athletic Director Dupuis recommends Hailey Benesh for the Head Softball position at the high school level.

Hailey has been playing softball since she could hit a ball off a tee. Hailey played on various little league teams while in elementary/middle school and four years at Sturgeon Bay High School. During high school summers, Hailey played for travel teams such as the Green Bay Express and Wisconsin Wildfire. Hailey continued her playing career after high school at the College of DuPage in Illinois for a semester. Hailey's dad, Jim Benesh, was the softball coach at Sturgeon Bay High School for 30 years. Hailey was a volunteer assistant coach for the 2024 season at Sturgeon Bay High School.

A motion to approve Hailey Benesh as the Head Softball Coach beginning with the 2024-2025 school year is recommended.

- B. High School Assistant Football: Athletic Director Dupuis recommends Jacob Ewing as an assistant football position at the high school level (half contract).

Jacob started his 9-year football career in third grade with tackle football. Transition to high school, where he was a 4-year starter, playing Center for 2 years, Defensive Tackle for 2 years, Offensive tackle for 2 years, and defensive end for 2 years. In Jacob's senior year, he was a part of a major turnaround for the school's program, breaking a 26-game losing streak (they went on the next season to have a playoff

berth). After high school, Jacob played for 1 year as a defensive end at the D3 college level, before a career ending shoulder injury. Outside of football, Jacob has been an assistant on the Sturgeon Bay High School Wrestling coaching staff.

A motion to approve Jacob Ewing as an assistant football coach beginning with the 2024-2025 school year is recommended.

## **5. Approve Middle School Coaching Positions**

- A. Middle School Football: Athletic Director Dupuis recommends Kyle Ploor as the middle school football coach.

Kyle was a multi-sport athlete growing up through high school participating in football, basketball, and baseball. Kyle has also participated for 15 years in the Door County Baseball League. Kyle has coached for four years in the league as well. Kyle has helped at various sport camps throughout the years.

A motion to approve Kyle Ploor as the middle school football coach beginning with the 2024-2025 school year is recommended.

- B. Middle School Volleyball

As of the preparation of the meeting packet there is no formal recommendation to share yet but we are hopeful there will be a recommendation in time for the board meeting.

A motion to approve a middle school volleyball coach beginning with the 2024-2025 school year is anticipated.

## **6. Approve Strategic Action Plan for 2024-2025**

As we have discussed since the February 2017 Board and Administrative Team retreat, putting together a one-page document with identified priorities that can serve as a “strategic action plan” should help us not only with our internal processes and focus areas for a given year, but also should assist our work as we continue to work to communicate with our community.

The strategic action plan process is intended to:

- help provide clarity through annual priority areas for our organization,
- give us targeted items to monitor throughout the year, and
- provide a document for annual review so adjustments can be made for the following year.

As we have said in the past, feedback is welcome on the strategic action plan concept—as is focus as we consider our work, priorities, and overall focus for the upcoming year, as well as our ability to appropriately communicate those priorities to our families, staff members, and community members. As critical issues arise, we have certainly talked about how those could or should fit with the identified areas and can examine those accordingly whether during the year or in subsequent years.

The Core Admin Team and I have spent time especially on the Teaching and Learning area this spring and again in our June meeting. Based on these and other conversations with the Board and Core Team, we are working on the other two areas as well.

A motion to approve the Strategic Action Plan for 2024-2025 is recommended.

**7. Pupil Nondiscrimination Self-Evaluation Process Update. Report and Public Notice (informational item)**

As I shared in my June and July reports, we've been in contact with DPI and have been working through the self-evaluation process. We also had an agenda item in the July meeting providing notice to the community about the process in case anyone wanted to learn more about it, provide feedback, etc. Typically, the process is done every five years, although this was one of the things DPI put on hold during COVID.

A copy of the report should be included in the meeting packet. The report will be added to our website, so it is available to anyone from the public. Let this agenda item also serve as public notice that the report will be available on our website. I will submit the proper assurances to DPI that the process has been completed and the report is available prior to the start of the new school year.

While no action is required of the Board, I thought it was appropriate to have one more agenda item on the topic, so people have the chance to be informed.

**8. Reports**      [See attachment](#)

**9. Adjourn**

THE SCHOOL DISTRICT OF STURGEON BAY

Regular Board of Education Meeting

Wednesday, July 17, 2024

President Stephani called the regular meeting to order at 7:02 PM in the high school library. Present: Spritka, Kruse, Stephani, Jennerjohn, Chisholm, Haus and Meyer. Excused: Howard and Schulz. Also present were: Superintendent Tjernagel, M. Smullen, K. Smullen, J. Holtz & A. DeMeuse. The Pledge of Allegiance was recited.

**Motion: Chisholm/Jennerjohn to adopt the agenda as presented. Motion carried unanimously.**

PUBLIC COMMENT SECTION: (as noted in Board Policy 0167.3 Public Comment at Board Meetings): None.

CONSENT AGENDA:

1. Approve minutes from June 19, 2024 Regular Meeting
2. Approve May bills.
3. Approve Grants and Donations –
  - \$10 anonymous donor for greenhouse
  - \$22 for Clipper Clays from Chuck Schommer
  - Playground Donations
    - i. \$4,000 anonymous donor
    - ii. \$1,000 Rick & Nancy Jeanquart Charitable Foundation
    - iii. \$80,000 anonymous donor

Thank you to everyone involved in supporting our students and programs through grants and donations.

4. Approve Resignations and Retirements: None.

**5. Accept Seclusion and Restraint Annual Report**

Act 125 requires that schools report annually to the school board by September 1 about any incidents from the previous school year. Most incidents of seclusions and restraint in school districts typically occur at the elementary level.

Director Ferry has prepared the annual report summarizing the information from the past year with a small number of students. That report is included in the meeting packet.

6. Board Policy Second Readings
  - a. 0164V2 new Meetings (Unified School Districts Only)
  - b. 1260 Incapacity of the District Administrator
  - c. 1421 Criminal History Record Check and Employee Self-Reporting
  - d. 2451 Program and Curriculum Modifications
  - e. 2521 Selection of Instructional Materials and Equipment
  - f. 5350 Suicide Prevention, Intervention, and Postvention for Death by Suicide
  - g. 5505 new Academic Honesty
  - h. 5530 Student Use or Possession of Intoxicants, Drugs, or Paraphernalia
  - i. 6236 new Community Services Fund (Fund 80)
  - j. 6610 Non-district-Supported Student Activity Accounts
  - k. 7250.01 new Memorials for Staff and Students
  - l. 7440.01 Video Surveillance and Electronic Monitoring

- m. 7440.02 new Smart Monitoring Equipment
- n. 7540.08 new Artificial Intelligence (AI)
- o. 8146 Notification of Education Options
- p. 8310 Public Records
- q. 8420 School Safety
- r. 8500 Food Services
- s. 8531 Free and Reduces-Price Meals
- t. 8700 new Nursing Mothers
- u. 8913 new/renumbered Section 504/ADA Prohibition Against Disability Discrimination in Employment
- v. 9211 District-Support Organizations
- w. 3431 (moved from technical)

7. Board Policy – Rescinded

- a. 0164.1 Regular Meetings
- b. 0164.2 Special Meetings
- c. 0165.1 Notice of Meetings
- d. 0165.2 Change of Regular Meetings
- e. 1623, 3123, 4123 Section 504/ADA Prohibition Against Disability Discrimination
- f. 3120.07 Employment of Casual Resource Personnel
- g. 4430.05 Nursing Mothers
- h. 5250 Program or Curriculum Modification
- i. 9210 Parent Organizations

**Motion: Jennerjohn/Kruse to approve the consent agenda items as presented. Motion carried unanimously.**

OPERATIONS AGENDA:

1. Consent Agenda items requiring attention (if any): None.
2. **Motion: Kruse/Spritka to approve Anna Fischer as a second-grade teacher at Sawyer School. Motion carried unanimously.**
3. **Motion: Jennerjohn/Chisholm to approve Sam Martylewski as Library Teaching Associate at Sunrise School. Motion carried unanimously.**
4. Strategic Action Plan and Priorities Draft for 2024-2025: Superintendent Tjernagel provided a brief history on the planning process and priority areas, as determined by the board.
5. **Approve Annual Public Notice of Academic Standards**  
The 2015-2017 state budget, also known as 2015 Wisconsin Act 55, added several notice requirements for school districts. The items involve notice regarding academic standards, school report cards and ranking levels, educational options, and the special needs voucher program.

As we have been reminded by WASB in the past, “School Boards are reminded that they must include an item on the agenda of the first school board meeting of the school year (the first board meeting after July 1) that clearly identifies the student academic standards . . . that will be in effect for the school year . . . In addition, school boards are required . . . to notify the parents/guardians of students . . . This notice may be provided electronically, including by posting the notice or a link to the specific academic standards on the school district’s website.”

Once a new curriculum for a particular academic area has been adopted, that curriculum stays in place until a change is approved at a later date. Again, the requirement that we need to notify the public annually of these standards began just a few years ago.

In gathering feedback from various individuals and in alignment with our discussion on the topic in the past, it continues to appear that the clearest way of communicating this is that we follow “Sturgeon Bay Standards.” Work in recent years has involved the Wisconsin Academic Standards in most areas. Calling them Sturgeon Bay Standards gives us flexibility to be able to address any areas that may cause concern within our school community and avoids the perception of having to adopt something without the flexibility to adapt if and when concerns may arise when it comes to national or state standards conversations, if you will. Curriculum information is posted on the Sturgeon Bay School District website and can be accessed using the following link:

<https://www.sturbay.k12.wi.us/departments/curriculum.cfm>

We are also including a link to the DPI website and Academic Standards page for your convenience: <http://dpi.wi.gov/standards>.

**Motion: Jennerjohn/Spritka to give the required annual notice pertaining to academic standards utilized in the School District of Sturgeon Bay for the 2024-2025 school year. Motion carried unanimously.**

**6. Policy 2264 - Title IX (first reading—see note)**

We have worked with Neola, as well as legal counsel, to prepare a policy for your review in the July 17 meeting.

We initially reached out to Mary Gerbig mid-June about the proposed Title IX policy process. We sent Mary an updated draft policy earlier this month and are awaiting answers to some of our questions as well as legal guidance specific to our district.

Mary pointed out that there will likely be some language that we will need to add to the handbooks approved last month. Her recommendation “*is to have the board authorize administration to update the handbook Title IX language consistent with your policy review and approval process, and per legal counsel’s review and recommendations*”. Basically, you as the board are authorizing the update process. In a nutshell, we would not be looking to change the content of the handbooks, but simply update any language needed to be in compliance with the new Title IX requirements.

Note 1: While our Board policies receive a first and a second reading in the event of revisions, replacement policies, etc. per our own practices, our usual process would mean that this policy isn’t officially in place until the night of the August 21 regular Board meeting. Since the new Title IX regulations are supposed to be in place by August 1, one way to look at this is that whatever comes out of our first reading is “active” pending eventual approval, likely on August 21. If something else would be approved, we can always have that modified with Neola and the Board Docs software as well. Additionally, our plan is to proceed with legal counsel and to communicate with the Board regarding the best approach in the event we’d receive a complaint between August 1 and 21. Some of the “fine print” with the whole situation also deals with determining if the situation(s) involving a complaint occurred prior to August 1, after August 1, or a combination of before and after August 1.

Note 2: I included in my superintendent report for this month the information I shared verbally last month about the litigation involving Title IX requirements in some states. As of when I last updated my report and the language for this section in the background document, Wisconsin is not part of any litigation to my knowledge. Obviously if this changes I will plan to communicate with you accordingly.

Note 3: Our Neola Rep has shared with us three documents in case any Board member is interested. I'll list them below. Feel free to contact Ann DeMeuse and/or me if you'd like one of more of these. Due to the length of the documents, we didn't think adding them to the Board packet was the best way to go, but we can share them with individuals or the full Board as you feel is appropriate.

- The official 423-page version of the new Title IX Final rule. We are told that this is what is published in the Federal Register.
- The Title IX Final Rule Fact Sheet (5 pages)
- The Title IX Final Rule Summary Table (15 pages).

## **7. Five-Year Pupil Nondiscrimination Self-Evaluation Public Input Notice and Related Updates (informational item)**

DPI requires districts to conduct a self-evaluation every so many years. Some operational things were "paused" if you will during Covid, so our last required self-evaluation was actually associated with the 2016-2017 school year. As part of this self-evaluation, districts need to review a variety of areas addressed in Chapter 9 of Wisconsin Administrative Code, specifically sections PI 9.03, PI 9.04, PI 9.05, and PI 9.06.

To summarize, these sections deal with prohibiting discrimination against pupils, having procedures for handling complaints (ex. such as information within our policies in consultation with Neola), providing certain types of notice annually, having a pupil nondiscrimination statement in our handbooks and course description books, etc.

Additionally, the district needs to provide "an opportunity for participation by pupils, teachers, administrators, parents/guardians, and resident of the school district as required by Wis. Admin Code PI 9.06 (2)." Therefore, we are drawing specific attention to this opportunity for participation and input in our July 17, 2024, Board of Education meeting agenda and related notices. (I will cover this verbally during the meeting as well.)

**If any students, teachers, parents/guardian, and residents want to provide input and learning more about the process, they can contact Superintendent Dan Tjernagel via phone at 920-746-2801 or via email at [dtjernagel@sturbay.k12.wi.us](mailto:dtjernagel@sturbay.k12.wi.us) by Noon on Monday, August 12.**

***Note: If you call or email Dan and he is out of the district on a given day(s), please connect with Mrs. Ann DeMeuse to ensure that your question can be answered and/or any pertinent comments can be included with our report.***

On August 12 we will begin assembling the Board meeting packet for the August 21 Board of Education meeting, and it is our intent to have the self-evaluation process completed prior to the August 21 Board meeting. Following completion of the report, Dan will fill out the PI-1198 form that provides the related assurances for this process. The district will also have the report available for any residents of the school district as noted in PI 9.06 (3).

To provide some additional insight at this point, Lindsay Ferry and our school counseling team met in late June and updated components of our report template, so thank you very much to each of them. Members of the administrative team are also involved in the process especially when it comes to examples such as enrollment in classes, involvement in co-curriculars, and scholarships received. Ann DeMeuse and Dan are checking things such as the various procedural pieces, inclusion of the pupil nondiscrimination statement in various locations, and the pertinent notices.

Thank you to everyone who has already assisted, thanks in advance to anyone else who will assist with the process, and again please contact Dan Tjernagel if you have any questions or comments about this.

## **8. Reports:**

- a. Legislative – none.
- b. CESA – none.
- c. Committee/Seminars – none.
- d. Administrative Reports presented.
- e. Superintendent’s Report presented.

**9. Motion: Chisholm/Jennerjohn to adjourn at 7:54 PM. Motion carried unanimously.**

Respectfully submitted by,  
Ann DeMeuse  
Board Recording Secretary

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

President’s Signature: \_\_\_\_\_



CHECK	CHECK CHE	ACCOUNT	INVOICE
DATE	NUMBER TYP	AMOUNT NUMBER	VENDOR DESCRIPTION
07/11/2024	242500006 A	212.25 10 E 800 324 253000 000	A-1 ELEVATOR SERVICE QRTRLY ELEVATOR MAINTENANCE-TJ WALKER
07/11/2024	242500006 A	141.00 10 E 800 324 253000 000	A-1 ELEVATOR SERVICE QRTRLY ELEVATOR MAINTENANCE-SUNRISE
07/11/2024	242500007 A	515.00 10 E 800 941 239000 000	ASSOC OF WISC SCH AD Membership Renewal 2024-2024 K. DeVillers
07/11/2024	242500007 A	515.00 10 E 800 941 239000 000	ASSOC OF WISC SCH AD Membership Renewal 2024-2024 K. Smullen
07/11/2024	242500008 A	1,935.10 10 E 800 411 253000 000	BELSON CO Maintenance Supplies
07/11/2024	104595 R	2,102.40 10 E 800 480 295000 000	BRIGHTARROW TECHNOLO Notification System Annual Subscription Renewal 06/29/24 - 06/28/25
07/11/2024	242500009 A	1,845.00 10 E 800 351 239000 000	BRILLIANT MARKETING deposit for literacy campaign
07/11/2024	242500010 A	1,505.99 10 E 120 449 241000 000	CAMERA CORNER-CONNEC EARTEC Handheld Radios Catalog # SC-10000PLUS
07/11/2024	104596 R	3,975.00 10 E 800 480 295000 000	CAN DO U, LLC 1 YEAR ACCESS TO HS VIDEOS/STAFF TRAINING 07.03.24 - 07.03.25
07/11/2024	104597 R	48.30 10 E 120 411 126000 000	CAROLINA BIOLOGICAL Sawyer Science Supplies
07/11/2024	104597 R	81.33 10 E 120 411 126000 000	CAROLINA BIOLOGICAL Sawyer Science Supplies
07/11/2024	242500011 A	11,202.80 10 E 800 480 295000 000	CDW GOVERNMENT Laptop trial order from CDWG. 12 L13 Yoga devices and 10 L15. Gen 4 Acct: 10 e 800 480 29500 Subheading: Staff laptops
07/11/2024	242500011 A	13,210.44 10 E 800 480 295000 000	CDW GOVERNMENT Laptop trial order from CDWG. 12 L13 Yoga devices and 10 L15. Gen 4 Acct: 10 e 800 480 29500 Subheading: Staff laptops
07/11/2024	242500012 A	899.00 10 E 200 310 221300 000	CESA 7 LETRS Summer Training - S. Judas
07/11/2024	104598 R	75,524.37 10 E 800 310 253700 000	CITY OF STURGEON BAY SCHOOL RESOURCE OFFICER 2024-2025
07/11/2024	104599 R	18,642.00 10 E 800 711 270000 000	COMMUNITY INSURANCE LIABILITY INSURANCE 7/1/24-7/1/25 POLICY #'S SGL22358-24/SPRA1367-24
07/11/2024	242500013 A	8,698.00 27 E 800 310 221300 341	CPI Non-Violent Crisis Intervention Training (C. Potier)
07/11/2024	242500013 A	200.00 27 E 800 941 223300 341	CPI Membership Renewal K. Martens 07/20/24 - 07/19/25
07/11/2024	104600 R	3,058.99 50 E 800 324 257220 000	EDUTRAK LLC Annual Service/Support & License Renewal 2024-2025
07/11/2024	104601 R	258.91 10 E 400 411 126000 000	FLINN SCIENTIFIC INC Science Supplies
07/11/2024	242500014 A	17,424.35 10 E 800 480 252100 000	FRONTLINE TECHNOLOGI 06/01/2024-05/31/2025 license agreements and support fees
07/11/2024	242500014 A	6,125.57 10 E 800 480 295000 000	FRONTLINE TECHNOLOGI Absence & Substitute Management 2024-2025
07/11/2024	242500014 A	3,445.01 10 E 800 480 295000 000	FRONTLINE TECHNOLOGI IHDM Solution (including Asset Management & Help Desk Management)
07/11/2024	242500015 A	21.35 10 E 120 411 111000 000	GORDON, BRINLEY 7/1/2024 Classroom Supplies
07/11/2024	242500016 A	467.65 10 E 800 411 252100 000	HOLTZ, JACOB 7/10/2024 Office gifts and air purifier

CHECK	CHECK CHE	ACCOUNT	INVOICE
DATE	NUMBER TYP	AMOUNT NUMBER	VENDOR DESCRIPTION
07/11/2024	242500016 A	123.28 10 E 800 449 252100 000	HOLTZ, JACOB 7/10/2024 Office gifts and air purifier
07/11/2024	242500017 A	748.50 10 E 800 480 221500 000	IMAGINE LEARNING LLC Odysseyware Reusable Enrollment
07/11/2024	104602 R	194.97 10 E 120 411 126000 000	INSECT LORE science supplies
07/11/2024	242500018 A	5,184.00 10 E 800 321 295000 000	ISCORP Skyward Hosting Services 2024-2025
07/11/2024	242500019 A	91.99 10 E 120 411 122900 000	LAKESHORE LEARNING M EL Classroom Supplies
07/11/2024	242500020 A	675.00 10 E 800 310 264400 000	MARCIA BRENNER & ASS PowerSchool User Conference Registration Fees - A. Lautenbach
07/11/2024	242500020 A	525.00 10 E 400 310 221300 000	MARCIA BRENNER & ASS PowerSchool User Conference Registration Fees - K. Kratcha
07/11/2024	242500020 A	3,121.25 10 E 800 310 264400 000	MARCIA BRENNER & ASS Admin Support Plan
07/11/2024	242500020 A	2,394.60 10 E 800 480 295000 000	MARCIA BRENNER & ASS PS PLUG INS ANNUAL SUPPORT
07/11/2024	242500021 A	116.89 10 E 800 411 162000 000	MEDCO SUPPLY COMPANY Athletic Trainer Supplies
07/11/2024	242500021 A	1,238.73 10 E 800 411 162000 000	MEDCO SUPPLY COMPANY Athletic Trainer Supplies
07/11/2024	242500021 A	72.28 10 E 800 411 162000 000	MEDCO SUPPLY COMPANY Athletic Trainer Supplies
07/11/2024	104603 R	799.00 10 E 800 480 221500 000	MIDSCHOOLMATH LLC One Year Student Subscription Core Curriculum
07/11/2024	104604 R	1,500.00 10 E 200 414 120000 000	MUSIC THEATRE INTERN MS Allied Arts Production
07/11/2024	242500022 A	3,375.00 10 E 800 480 221500 000	NOTABLE INC Kami License Renewal
07/11/2024	104605 R	2,150.00 10 E 800 943 162000 000	PACKERLAND CONFERENC CONFERENCE DUES 2024-2025
07/11/2024	104606 R	7,736.87 10 E 800 411 253000 000	PIKE SYSTEMS INC Maintenance Supplies
07/11/2024	242500023 A	13,656.00 10 E 800 480 295000 000	POWERSCHOOL GROUP LL SIS Maintenance & Support/Hosting Certificate
07/11/2024	242500024 A	950.00 10 E 200 310 221300 000	PROJECT LEAD THE WAY PLTW Launch Participation 2024-2025 TJWMS
07/11/2024	242500024 A	950.00 10 E 120 310 221300 000	PROJECT LEAD THE WAY PLTW Launch Participation - Sawyer 2024-2025
07/11/2024	242500024 A	950.00 10 E 140 310 221300 000	PROJECT LEAD THE WAY PLTW Launch Participation - Sunrise 2024-2025
07/11/2024	104607 R	500.00 80 E 800 411 232201 000	STURGEON BAY YACHT C Deposit for Rock the Dock 2025
07/11/2024	242500025 A	8,951.25 10 E 800 480 295000 000	SENSO.CLOUD Senso Device Management Renewal 06/16/24 - 06/16/25
07/11/2024	104608 R	12,286.00 10 E 800 713 270000 000	SFM WORKERS COMPENSATION 7/2024 & 8/2024
07/11/2024	242500026 A	16,006.95 10 E 800 480 252100 000	SKYWARD Financial Management Core Software License
07/11/2024	104609 R	9,485.00 10 E 200 480 221500 000	SOURCEWELL SpringMath Ongoing Advantage/License
07/11/2024	242500027 A	20.80 27 E 800 411 158100 341	STAPLES ADVANTAGE supplies
07/11/2024	242500028 A	1,399.00 10 E 800 360 222200 031	SWANK MOTION PICTURE SWANK Video Streaming
07/11/2024	104610 R	550.35 10 E 800 411 253000 000	ULINE Maintenance Supplies
07/11/2024	104611 R	275.00 10 E 800 941 252100 000	WASBO FOUNDATION 2024-2024 WASB District Professional Membership A. LaLuzerne
07/11/2024	242500029 A	4,020.01 10 E 800 480 222200 031	WEVIDEO WeVideo
07/11/2024	104612 R	5,654.00 10 E 800 310 231000 000	WISCONSIN ASSOCIATIO Membership Dues 2024-2025
07/11/2024	104612 R	240.00 10 E 800 354 258000 000	WISCONSIN ASSOCIATIO FOCUS FEE 2024-2025
07/11/2024	104613 R	100.00 10 E 800 941 239000 000	WIS ASSOC OF SCHOOL WASSA Dues 07/01/24-06/30/25 A. DeMeuse
07/11/2024	242500030 A	1,540.00 10 E 800 941 239000 000	WIS ASSOC SCHOOL PER Membership Renewal Holtz & LaLuzerne thru 06.30.25

CHECK	CHECK CHE	ACCOUNT	INVOICE
DATE	NUMBER TYP	AMOUNT NUMBER	VENDOR DESCRIPTION
07/11/2024	104614 R	100.00 21 E 400 310 163901 000	WISCONSIN HERD Group Deposit for Band in the Stands 2024
07/16/2024	104615 R	255.83 98 L 000 000 811680 000	MESSERLI & KRAMER PA Case No. 11CV142; File #12-02077
07/16/2024	104616 R	90.00 98 L 000 000 811660 000	SB LUNCH PROGRAM Payroll accrual
07/18/2024	242500035 A	79.50 10 E 800 411 162000 000	BSN SPORTS REMIT Mouthguards
07/18/2024	242500036 A	60,000.00 10 E 800 480 295000 000	CAMERA CORNER-CONNEC Fortinet renewal
07/18/2024	242500037 A	154.85 10 E 800 434 222200 031	EBS CO REMIT Magazine Subscriptions
07/18/2024	242500038 A	1,550.00 10 E 800 324 253000 000	ENVIRONMENTAL MGT CO Semi-annual ESHC maintenance fee
07/18/2024	242500038 A	420.00 10 E 800 324 253000 000	ENVIRONMENTAL MGT CO Semi-annual SDS manager maintenance fee
07/18/2024	242500038 A	1,047.70 10 E 800 324 253000 000	ENVIRONMENTAL MGT CO Vector solutions online training
07/18/2024	242500039 A	831.60 10 E 800 310 239000 000	ERC INC Monthly EAP Services
07/18/2024	104620 R	358.99 10 E 800 411 253000 000	HALLMAN LINDSAY QUAL Painting Supplies
07/18/2024	104621 R	809.62 10 E 800 411 162000 000	HEALY AWARDS INC Football helmet decals
07/18/2024	242500040 A	215.85 50 L 000 000 815000 000	HERBST, NICOLE refund of school meal account
07/18/2024	242500041 A	199.97 10 E 120 411 110500 000	LAKESHORE LEARNING M Supply Order--Lakeshore
07/18/2024	104622 R	310.00 21 E 400 310 162121 000	ONE WISCONSIN Volleyball varsity summer league
07/18/2024	242500042 A	330.97 10 E 400 411 241000 000	QUILL LLC HS supplies
07/18/2024	242500043 A	57.04 10 E 100 411 110100 000	SCHOENEMAN, MANDY 7/7/2024-7/12/2024 Summer School Supplies for Lemonade Stand
07/18/2024	242500043 A	45.73 10 E 100 411 110100 000	SCHOENEMAN, MANDY 7/7/2024-7/12/2024 Summer School Supplies for Lemonade Stand
07/18/2024	242500043 A	26.17 10 E 100 411 110100 000	SCHOENEMAN, MANDY 7/7/2024-7/12/2024 Summer School Supplies for Lemonade Stand
07/18/2024	242500043 A	34.94 10 E 100 411 110100 000	SCHOENEMAN, MANDY 7/7/2024-7/12/2024 Summer School Supplies for Lemonade Stand
07/18/2024	242500043 A	24.67 10 E 100 411 110100 000	SCHOENEMAN, MANDY 7/7/2024-7/12/2024 Summer School Supplies for Lemonade Stand
07/18/2024	242500043 A	7.49 10 E 100 411 110100 000	SCHOENEMAN, MANDY 7/7/2024-7/12/2024 Summer School Supplies for Lemonade Stand
07/18/2024	242500043 A	15.00 10 E 100 411 110100 000	SCHOENEMAN, MANDY 7/7/2024-7/12/2024 Summer School Supplies for Lemonade Stand
07/18/2024	242500044 A	25,141.18 10 E 800 449 253000 000	SHAW INDUSTRIES Customer #0225115 Order #630756
07/18/2024	104623 R	733.11 10 E 800 324 253000 000	TOTAL ENERGY SYSTEMS Engine routine inspection
07/18/2024	104623 R	698.00 10 E 800 324 253000 000	TOTAL ENERGY SYSTEMS 473 routine engine inspection
07/18/2024	242500045 A	3,249.62 10 E 800 324 253000 000	VANS FIRE & SAFETY I Inspection Job# 34963000
07/18/2024	242500045 A	592.08 10 E 800 324 253000 000	VANS FIRE & SAFETY I Inspection Job #34962997
07/18/2024	242500045 A	471.11 10 E 800 324 253000 000	VANS FIRE & SAFETY I Inspection Job #34962778
07/18/2024	242500045 A	106.99 10 E 800 324 253000 000	VANS FIRE & SAFETY I Inspection Job #34962996
07/18/2024	242500045 A	219.62 10 E 800 324 253000 000	VANS FIRE & SAFETY I Inspection Job #34962730
07/18/2024	242500045 A	334.60 10 E 800 324 253000 000	VANS FIRE & SAFETY I Inspection Job #34962751
07/18/2024	104624 R	53.90 10 E 400 411 241000 000	WOLTER ENGRAVING SER Engraved mail box and name plates
07/18/2024	242500046 A	68,014.00 10 E 800 712 270000 000	WRIGHT SPECIALTY INS Property Insurance 7/1/24 -

CHECK	CHECK CHE	ACCOUNT	INVOICE
DATE	NUMBER TYP	AMOUNT NUMBER	DESCRIPTION
07/18/2024	104625 R	422.00 10 E 800 943 120000 000	7/1/25 2024-2025 WSMA Member School Dues
07/18/2024	104625 R	289.00 10 E 800 943 120000 000	2024-2025 WSMA Member school dues
07/24/2024	104626 R	3,968.71 98 L 000 000 811634 000	MADISON NATIONAL LIF Group Life Ins. - August
07/24/2024	104627 R	2,564.59 98 L 000 000 811635 000	MADISON NATIONAL LIF Short-term & Long-term Disability - August
07/24/2024	104627 R	1,187.79 98 L 000 000 811639 000	MADISON NATIONAL LIF Short-term & Long-term Disability - August
07/24/2024	104628 R	457.94 98 L 000 000 811637 000	MADISON NATIONAL LIF Vol. Life - 24 Pay - August
07/24/2024	104629 R	1,316.18 98 L 000 000 811647 000	SUPERIOR VISION INSU Vision Insurance - August Coverage
07/29/2024	104630 R	258.45 98 L 000 000 811680 000	MESSERLI & KRAMER PA Case No. 11CV142; File #12-02077
07/29/2024	104631 R	42.00 98 L 000 000 811690 000	UNITED WAY Employee Donations
07/29/2024	104631 R	57.00 98 L 000 000 811690 000	UNITED WAY Employee Donations
07/29/2024	104631 R	57.00 98 L 000 000 811690 000	UNITED WAY Employee Donations
07/03/2024	202400003 W	540.87 98 L 000 000 811675 000	WEA MEMBER BENEFITS TSA Benefit: Tjernagel \$389.57 & Holtz \$115.11
07/03/2024	202400001 W	110.00 98 L 000 000 811642 000	WEA TRUST ADVANTAGE WEA Roth IRA
07/03/2024	202400001 W	317.00 98 L 000 000 811642 000	WEA TRUST ADVANTAGE WEA Roth TSA
07/03/2024	202400001 W	425.00 98 L 000 000 811676 000	WEA TRUST ADVANTAGE WEA Tax Sheltered Annuity
07/03/2024	202400002 W	145.00 98 L 000 000 811672 000	WISCONSIN DEFERRED C Plan #98971-01 Employee Contributions
07/03/2024	202400002 W	25.00 98 L 000 000 811672 000	WISCONSIN DEFERRED C Plan #98971-01 Roth Employee Contributions
07/08/2024	202400029 W	400.63 10 E 800 324 253000 000	AIRGAS USA LLC Credit Card Payment AP Invoice.
07/08/2024	202400022 W	10.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	9.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	8.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	6.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	10.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	9.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	5.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	5.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	9.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	6.49 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	4.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	9.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	9.99 10 E 800 432 222200 031	AMAZON.COM Credit Card Payment AP Invoice.
07/08/2024	202400022 W	3.79 10 E 800 990 239000 000	AMAZON.COM Credit Card Payment AP

CHECK	CHECK CHE	ACCOUNT	INVOICE
DATE	NUMBER TYP	AMOUNT NUMBER	DESCRIPTION
07/08/2024	202400022 W	3.79 10 E 800 990 239000 000	Invoice. Credit Card Payment AP
07/08/2024	202400022 W	4.21 10 E 800 990 239000 000	Invoice. Credit Card Payment AP
07/08/2024	202400025 W	366.00 10 E 120 310 221300 000	Invoice. Credit Card Payment AP
07/08/2024	202400025 W	366.00 10 E 140 310 221300 000	Invoice. Credit Card Payment AP
07/08/2024	202400027 W	375.00 10 E 800 386 221300 000	Invoice. Credit Card Payment AP
07/08/2024	202400021 W	91.14 10 E 800 432 222200 031	Invoice. Credit Card Payment AP
07/08/2024	202400024 W	1,113.37 10 E 800 411 253000 000	Invoice. Credit Card Payment AP
07/08/2024	202400023 W	1,296.00 21 E 200 411 166329 000	Invoice. Credit Card Payment AP
07/08/2024	202400026 W	138.00 10 E 120 310 221300 000	Invoice. Credit Card Payment AP
07/08/2024	202400028 W	544.00 10 E 800 353 263300 000	Invoice. Credit Card Payment AP
07/08/2024	202400030 W	453.20 27 E 400 480 158100 341	Invoice. Credit Card Payment AP
07/08/2024	202400020 W	1,690.00 10 E 800 941 252100 000	Invoice. Credit Card Payment AP
07/08/2024	202400020 W	295.00 10 E 800 310 264400 000	Invoice. Credit Card Payment AP
07/01/2024	202400004 W	253.51 50 E 800 415 257250 000	PEPSI-COLA OF GREEN HS Vending
07/18/2024	202400031 W	15.99 10 E 120 472 110000 000	AMAZON.COM SEL Curriculum Materials
07/18/2024	202400032 W	39.48 10 E 120 472 110000 000	AMAZON.COM SEL Curriculum Materials
07/18/2024	202400033 W	5.83 10 E 120 472 110000 000	AMAZON.COM SEL Curriculum Materials
07/18/2024	202400034 W	179.92 10 E 800 480 295000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	44.44 10 E 800 480 295000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	189.00 10 E 800 480 295000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	179.67 10 E 800 449 295000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	117.95 10 E 800 480 295000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	97.33 10 E 800 480 295000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	63.99 10 E 800 480 295000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	289.77 10 E 800 449 295000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	38.89 10 E 800 411 253000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	103.60 10 E 800 411 253000 000	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	13.20 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	6.49 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	52.00 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	24.30 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	13.99 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	33.24 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	4.39 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	31.31 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	39.99 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	149.99 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	153.59 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	119.99 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	21.99 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	13.58 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.
07/18/2024	202400034 W	15.96 27 E 800 411 158100 341	AMAZON.COM Amazon Payment AP Invoice.

CHECK		CHECK CHE		ACCOUNT				INVOICE	
DATE	NUMBER	TYP	AMOUNT	NUMBER				VENDOR	DESCRIPTION
07/18/2024	202400034	W	34.88	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	29.90	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	22.99	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	19.18	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	67.02	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	364.89	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	119.94	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	364.00	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	129.99	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	35.99	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	179.98	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	139.98	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	542.70	27 E 800 411 158100 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	2,899.98	27 E 800 411 223300 341				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	18.90	10 E 140 411 241000 000				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	69.69	10 E 140 411 241000 000				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	13.85	10 E 140 411 241000 000				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	21.05	10 E 140 411 241000 000				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	6.72	10 E 140 411 241000 000				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	69.51	10 E 400 470 127000 000				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400034	W	6.87	10 E 400 470 127000 000				AMAZON.COM	Amazon Payment AP Invoice.
07/18/2024	202400035	W	35.98	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Volleyball
07/18/2024	202400036	W	79.19	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400037	W	28.08	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400038	W	6.70	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400039	W	9.05	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400040	W	23.38	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400041	W	10.17	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400042	W	40.87	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400043	W	20.47	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400044	W	35.23	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400045	W	9.04	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400046	W	20.48	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400047	W	6.00	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400048	W	7.01	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400049	W	16.77	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400050	W	18.60	10 E 100 411 110100 000				AMAZON.COM	Summer School Supplies - Lemonade Stand
07/18/2024	202400051	W	118.69	10 E 120 411 111000 000				AMAZON.COM	1st Grade Classroom Easel
07/18/2024	202400052	W	23.57	10 E 100 411 110100 000				AMAZON.COM	Summer School supplies: Rocketry & Makerspace

CHECK	CHECK	CHE	ACCOUNT								INVOICE	
DATE	NUMBER	TYP	AMOUNT	NUMBER							VENDOR	DESCRIPTION
07/18/2024	202400053	W	21.89	10	E	100	411	110100	000	AMAZON.COM	Summer School supplies:	
07/18/2024	202400054	W	77.00	10	E	100	411	110100	000	AMAZON.COM	Rocketry & Makerspace	
07/18/2024	202400055	W	36.89	10	E	400	411	241000	000	AMAZON.COM	Summer School supplies:	
07/18/2024	202400056	W	73.98	10	E	800	411	221200	000	AMAZON.COM	Rocketry & Makerspace	
07/18/2024	202400057	W	67.86	10	E	800	411	221200	000	AMAZON.COM	HS supplies	
07/18/2024	202400058	W	16.99	10	E	200	449	135200	000	AMAZON.COM	Teacher edition volumes I and	
07/18/2024	202400059	W	16.99	10	E	200	449	135200	000	AMAZON.COM	II of Math Expressions for	
07/18/2024	202400060	W	13.98	10	E	200	449	135200	000	AMAZON.COM	new grade 3 teacher	
07/18/2024	202400061	W	109.50	21	E	140	411	113000	013	AMAZON.COM	Teacher edition volumes I and	
07/18/2024	202400062	W	90.70	21	E	140	411	113000	013	AMAZON.COM	II of Math Expressions for	
07/18/2024	202400063	W	4.89	10	E	140	411	115000	000	AMAZON.COM	new grade 3 teacher	
07/18/2024	202400064	W	14.99	10	E	140	411	115000	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400065	W	29.21	10	E	140	411	115000	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400066	W	13.32	10	E	140	411	115000	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400067	W	14.95	10	E	140	411	115000	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400068	W	22.26	10	E	140	411	115000	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400069	W	55.98	10	E	140	411	115000	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400070	W	8.87	10	E	140	411	115000	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400071	W	13.85	10	E	140	411	115000	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400072	W	6.32	10	E	200	411	125400	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400072	W	6.34	10	E	400	411	125400	000	AMAZON.COM	Books for Hispanic Heritage	
07/18/2024	202400073	W	10.90	10	E	200	411	125400	000	AMAZON.COM	Month (grant from Rock the	
07/18/2024	202400073	W	10.90	10	E	400	411	125400	000	AMAZON.COM	Dock)	
07/18/2024	202400074	W	66.10	10	E	200	411	125400	000	AMAZON.COM	Books for Hispanic Heritage	
07/18/2024	202400074	W	66.10	10	E	400	411	125400	000	AMAZON.COM	Month (grant from Rock the	
07/18/2024	202400075	W	16.49	10	E	200	411	125400	000	AMAZON.COM	Dock)	
07/18/2024	202400075	W	16.50	10	E	400	411	125400	000	AMAZON.COM	Classroom Supplies	
07/18/2024	202400076	W	10.90	10	E	200	411	125400	000	AMAZON.COM	Classroom Supplies	
											Classroom Supplies	

CHECK		CHECK CHE		ACCOUNT				INVOICE	
DATE	NUMBER	TYP	AMOUNT	NUMBER				VENDOR	DESCRIPTION
07/18/2024	202400076	W	10.90	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400077	W	10.90	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400077	W	10.90	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400078	W	10.90	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400078	W	10.90	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400079	W	4.99	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400079	W	5.00	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400080	W	10.90	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400080	W	10.90	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400081	W	20.96	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400081	W	20.97	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400082	W	10.90	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400082	W	10.90	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400083	W	16.49	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400083	W	16.50	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400084	W	16.49	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400084	W	16.50	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400085	W	16.49	10 E 200 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other supplies
07/18/2024	202400085	W	16.50	10 E 400 411 125400 000				AMAZON.COM	Concert black clothing, replacing binders and other



CHECK	CHECK CHE	ACCOUNT	INVOICE
DATE	NUMBER TYP	AMOUNT NUMBER	VENDOR DESCRIPTION
07/18/2024	202400086 W	16.49 10 E 200 411 125400 000	AMAZON.COM supplies Concert black clothing, replacing binders and other supplies
07/18/2024	202400086 W	16.50 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400087 W	10.90 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400087 W	10.90 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400088 W	16.49 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400088 W	16.50 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400089 W	16.49 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400089 W	16.50 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400090 W	5.25 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400090 W	5.25 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400091 W	5.47 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400091 W	5.48 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400092 W	16.49 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400092 W	16.50 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400093 W	9.84 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400093 W	9.85 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400094 W	9.44 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400094 W	9.44 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400095 W	10.90 10 E 200 411 125400 000	AMAZON.COM Concert black clothing,

CHECK	CHECK CHE	ACCOUNT	INVOICE
DATE	NUMBER TYP	AMOUNT NUMBER	DESCRIPTION
			replacing binders and other supplies
07/18/2024	202400095 W	10.90 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400096 W	6.94 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400096 W	6.95 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400097 W	78.76 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400097 W	78.76 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400098 W	5.47 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400098 W	5.48 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400099 W	13.34 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400099 W	13.35 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400100 W	10.90 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400100 W	10.90 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400101 W	27.72 10 E 200 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400101 W	27.72 10 E 400 411 125400 000	AMAZON.COM Concert black clothing, replacing binders and other supplies
07/18/2024	202400102 W	56.83 10 E 120 411 122000 000	AMAZON.COM Classroom Supplies
07/18/2024	202400103 W	125.22 21 E 200 411 124000 023	AMAZON.COM Rock the Dock grant supplies
07/18/2024	202400104 W	117.15 21 E 200 411 124000 023	AMAZON.COM Rock the Dock grant supplies
07/18/2024	202400105 W	39.14 27 E 800 411 223300 341	AMAZON.COM Toner
07/18/2024	202400106 W	16.20 10 E 200 411 122200 000	AMAZON.COM Classroom textbooks
07/18/2024	202400107 W	16.70 10 E 200 411 122200 000	AMAZON.COM Classroom textbooks
07/18/2024	202400108 W	11.75 10 E 200 411 122200 000	AMAZON.COM Classroom textbooks
07/18/2024	202400109 W	11.64 10 E 200 411 122200 000	AMAZON.COM Classroom textbooks
07/18/2024	202400110 W	14.59 10 E 200 411 122200 000	AMAZON.COM Classroom textbooks
08/01/2024	202400010 W	18,418.23 98 L 000 000 811901 000	DEAN HEALTH INC Health Insurance - August Coverage
08/01/2024	202400010 W	149,021.29 98 L 000 000 811630 000	DEAN HEALTH INC Health Insurance - August Coverage
08/01/2024	202400010 W	14,744.96 10 E 800 290 292000 000	DEAN HEALTH INC Health Insurance - August Coverage

CHECK	CHECK CHE	ACCOUNT	INVOICE
DATE	NUMBER TYP	AMOUNT NUMBER	VENDOR DESCRIPTION
08/01/2024	202400011 W	13,240.37 98 L 000 000 811632 000	DELTA DENTAL Dental Insurance - August Coverage
08/01/2024	202400011 W	2,240.71 98 L 000 000 811902 000	DELTA DENTAL Dental Insurance - August Coverage
08/01/2024	202400011 W	745.12 10 E 800 290 292000 000	DELTA DENTAL Dental Insurance - August Coverage
08/01/2024	202400012 W	1,561.00 98 L 000 000 811646 000	STANDARD INSURANCE C Accident, Critical, and Hospital Ins. - August Coverage
08/01/2024	202400012 W	1,636.80 98 L 000 000 811648 000	STANDARD INSURANCE C Accident, Critical, and Hospital Ins. - August Coverage
08/01/2024	202400012 W	526.24 98 L 000 000 811649 000	STANDARD INSURANCE C Accident, Critical, and Hospital Ins. - August Coverage
07/17/2024	202400007 W	540.87 98 L 000 000 811675 000	WEA MEMBER BENEFITS TSA Benefit: Tjernagel \$389.57 & Holtz \$115.11
07/17/2024	202400005 W	110.00 98 L 000 000 811642 000	WEA TRUST ADVANTAGE WEA Roth IRA
07/17/2024	202400005 W	317.00 98 L 000 000 811642 000	WEA TRUST ADVANTAGE WEA Roth TSA
07/17/2024	202400005 W	425.00 98 L 000 000 811676 000	WEA TRUST ADVANTAGE WEA Tax Sheltered Annuity
07/17/2024	202400006 W	145.00 98 L 000 000 811672 000	WISCONSIN DEFERRED C Plan #98971-01 Employee Contributions
07/17/2024	202400006 W	25.00 98 L 000 000 811672 000	WISCONSIN DEFERRED C Plan #98971-01 Roth Employee Contributions
07/31/2024	202400015 W	0.69 10 E 800 355 263300 000	CENTURYLINK Monthly Charges
07/31/2024	202400014 W	612.74 10 E 800 310 239000 000	EMPLOYEE BENEFITS CO EBC Flex Fees/HRA Fees/UM Accts
07/31/2024	202400014 W	462.48 98 L 000 000 811900 000	EMPLOYEE BENEFITS CO EBC Flex Fees/HRA Fees/UM Accts
07/31/2024	202400014 W	4,130.50 10 E 800 248 239000 000	EMPLOYEE BENEFITS CO EBC Flex Fees/HRA Fees/UM Accts
07/31/2024	202400017 W	135.63 50 E 800 415 257220 000	GORDON FOOD SERVICE July 2024 Food Bills
07/31/2024	202400019 W	24,207.76 98 L 000 000 811611 000	INTERNAL REVENUE SER FEDERAL TAXES
07/31/2024	202400019 W	21,149.03 98 L 000 000 811612 000	INTERNAL REVENUE SER FEDERAL TAXES
07/31/2024	202400013 W	145.00 98 L 000 000 811672 000	WISCONSIN DEFERRED C Plan #98971-01 Employee Contributions
07/31/2024	202400013 W	25.00 98 L 000 000 811672 000	WISCONSIN DEFERRED C Plan #98971-01 Roth Employee Contributions
07/31/2024	202400018 W	73,107.44 98 L 000 000 811613 000	WISCONSIN DEPARTMENT STATE TAXES
07/31/2024	202400016 W	215,297.00 98 L 000 000 811621 000	WISCONSIN RETIREMENT STATE RETIREMENT
07/31/2024	202400016 W	33,562.02 98 L 000 000 811622 000	WISCONSIN RETIREMENT STATE RETIREMENT
		1,052,259.97 Totals for checks	

FUND SUMMARY

<u>FUND</u>	<u>DESCRIPTION</u>	<u>BALANCE SHEET</u>	<u>REVENUE</u>	<u>EXPENSE</u>	<u>TOTAL</u>
10	GENERAL FUND	0.00	0.00	462,909.25	462,909.25
21	SPECIAL REVENUE - GIFTS	0.00	0.00	2,148.57	2,148.57
27	SPECIAL EDUCATION	0.00	0.00	15,056.57	15,056.57
50	FOOD SERVICE FUND	215.85	0.00	3,448.13	3,663.98
80	COMMUNITY SERVICE FUND	0.00	0.00	500.00	500.00
98	PAYROLL CLEARING FUND	567,981.60	0.00	0.00	567,981.60
***	Fund Summary Totals ***	568,197.45	0.00	484,062.52	1,052,259.97

\*\*\*\*\* End of report \*\*\*\*\*

On Wed, Jul 24, 2024 at 11:24 AM Kayla Derber <[kderber@sbsdmail.net](mailto:kderber@sbsdmail.net)> wrote:  
Hi Katy,

As we discussed over the phone this morning, I would like to resign from my Safe Harbor Teacher Associate position. It was not an easy decision, but overall I just need a different/more flexible schedule for this upcoming school year. However, I would be interested in subbing for teaching or TA hours occasionally at Sawyer Elementary. Please let me know what the next steps are for subbing. Thank you for everything this last school year.

Have a good day,  
Kayla Derber



Ann Demeuse <ademeuse@sbsdmail.net>

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## Fwd: Additional Duties

1 message

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**Keith Nerby** <knerby@sbsdmail.net>  
To: Ann Demeuse <ademeuse@sbsdmail.net>

Mon, Jul 22, 2024 at 12:49 PM

Please see the resignation for HOSA from Emily Orns.



**Keith A. Nerby**  
Principal

**Sturgeon Bay High School**  
**920.746.2802**  
**#clipperpride**



----- Forwarded message -----

From: **Emily Orns** <eorns@sbsdmail.net>  
Date: Mon, Jul 22, 2024 at 12:02 PM  
Subject: Additional Duties  
To: Keith Nerby <knerby@sbsdmail.net>

Hi Keith,

I writing to let you know that I am resigning from the following positions:

1. HOSA Advisor
2. Service Learning Coordinator
3. High School Health and Wellness Representative

HOSA:

1. There are no blood drives planned through HOSA at this time. There were only two dates that worked with our schedule and I emailed the representative, Ben Leib, to let him know that we would not be doing blood drives. He may reach out to other groups or to you.

2. If we no longer have HOSA at this school, we will need to make sure that it is removed from our website as you must have an active chapter paying dues to have it listed on the website.

Service Learning:

I will prepare all of the documents such as contracts, calendar requirements, etc. to pass on to the next person that will take on this duty. Once we know who it will be, I can share the documents with them and answer any questions they may have.

I am resigning from these positions so that I can focus my time and efforts on teaching.

All the best,

--

**Emily M. Orns**

Family and Consumer Sciences Teacher



820-746-3850



eoms@sbsdmail.net

"Linking learning to life"



## **2024-2025 Strategic Action Plan & Priorities **DRAFT****

*Updated on 6-20-2024 during the June Core Admin Team meeting*

These three identified priority areas are from ongoing work which originated at the 2017 Annual Board of Education and Administrative Team Retreat. The strategic action plan process is intended to provide clarity through annual priority areas, give us targeted items to monitor throughout the year, and provide a document for annual review so adjustments can be made for the following year.

### **Teaching & Learning**

- **4K-12 Literacy and Math Growth**
  - **4K-12** Literacy and math fluency with a focus on data-driven foundational skills instruction that includes progress monitoring and data collection to inform tiered supports.
- **Utilize DuFour’s guiding questions to challenge and support “every student every day”—focusing on the PLC questions to continue to guide our work.**
  - What do we want our students to learn? How will we know? How will we respond if they did not learn it OR have already demonstrated proficiency?
  - Reignite usage of unit planning templates with a focus on effective assessment practices.
- **Quality Instructional Practices**
  - **Engage all students** in a robust learning experience that supports students in skill acquisition and in the application of those skills both in and out of the classroom.
  - **Responsive data-driven practices** provide equitable services that include academic and social/emotional intervention and enrichment.

### **Community Engagement**

- Update stakeholders regarding school and district operations through continued use of social media, regular school and district communications including but not limited to school and district newsletters, and updates through local media partners.

### **Finance, Facilities, & Operations**

- Continue short and long-term budget planning processes as part of the operational referendum cycle to continue the educational programming, appropriate staffing, and responsible capital utilization that the community has come to expect.
- Attract and retain quality staff by supporting growth, continual improvement, and leadership opportunities, as well as addressing various aspects of compensation (ex. professional staff salary ladder, remaining details from shift in PTO, and post-employment benefit systems).



STURGEON BAY SCHOOL DISTRICT  
1230 Michigan Street  
Sturgeon Bay, Wisconsin

Pupil Nondiscrimination Self-Evaluation Report  
to Meet Requirements of  
S.118.13, Wis. Stats., & PI 9, Wisconsin Administrative Code

August 2024

The Sturgeon Bay School District does not discriminate on the basis of sex, race, color, religion, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation or physical, mental, emotional, or learning disability.

## Table of Contents

Introduction and Self-Evaluation Process

Self-Evaluation Review Committee

Methods, Practices, Curriculum, and Materials Used in School Counseling

Participation Trends and Patterns; School District Support of Athletic,  
Extracurricular, and Recreational Activities

Trends and Patterns in Awarding Scholarships and Other Forms of  
Recognition and Achievement Provided or Administered by the  
School District

Summary of Specific Legal Requirements

Recommendations

Appendices

## **Introduction and Self-Evaluation Process**

In compliance with S.118.13, Wis. Stats., and PI 9, Wisconsin Administrative Code, the Sturgeon Bay School District conducted a self-evaluation of the status of pupil nondiscrimination and equality of educational opportunity.

This review and accompanying report format is based on the work of Fred A. Skebba. The District contracted with Fred A. Skebba, Educational Consultant back in 2017, to review documents, interview key staff members, and prepare a printed report at that time. Skebba is a former member of the Wisconsin Equity Cadre and had provided assistance since 1996 to school districts in CESA #9. At that time (2017), Fred also has three years' experience working with the American Diabetes Association, Wisconsin Chapter, to resolve parental complaints against Wisconsin school districts regarding harassment and/or discrimination of students with Diabetes.

## **Self-Evaluation Review Committee**

The following staff members provided material for the review through the interview process as well as by providing documents and/or data:

<u>Name</u>	<u>Title</u>
Karlie Martens	Grade PK-2 School Counselor at Sawyer Elementary School
Dakota Londo	Grade 3-5 School Counselor at Sunrise Elementary School
Morgan Kiedrowski	Grade 6-9 School Counselor at TJ Walker Middle School & Sturgeon Bay High School
Jenni O’Handley	Grade 10-12 School Counselor at Sturgeon Bay High School
Lindsay Ferry	Director of Special Education and Pupil Services
Jen Paye-Weber	Director of Teaching, Learning, & Technology
Amy Lautenbach	District Data Specialist
Katy DeVillers	Sawyer Elementary School Principal
Katie Smullen	Sunrise Elementary Principal
Mark Smullen	TJ Walker Middle School Principal
Keith Nerby	Sturgeon Bay High School Principal
Dan Tjernagel	Superintendent

Students, staff, parents, and residents of the school district were given an opportunity to make comments. No comments were received prior to the preparation of the report.

## **Review of Printed Materials**

The following printed materials were reviewed to determine if they meet the requirements of PI 9.05:

### Meet the Requirements

2023-2024 District Professional Staff Handbook

2023-2024 District Support Staff Handbook

2023-2024 High School Student/Family Handbook

2023-2024 High School Faculty & Staff Handbook

2023-2024 TJ Walker Middle School Student/Family Handbook

2023-2024 T. J. Walker Middle School Staff Handbook

2023-2024 Sunrise Elementary Family Handbook

2023-2024 Sunrise Elementary Staff Handbook

2023-2024 Sawyer Elementary Parent Handbook

2023-2024 Sawyer Elementary Staff Handbook

## **General Comments**

The district is sensitive to providing equal opportunity to all students without discrimination. The following comments made during the interview process will reinforce this commitment by the district. They are listed in the order in which they were received during the onsite review.

The district has a formal complaint procedure and a complaint officer.

There have been no formal, written complaints in recent years.

The district has not had a civil rights compliance review by the Wisconsin Department of Public Instruction in recent years.

Students are strongly encouraged to participate in athletics and activities.

The district partners with the following agencies to provide additional learning opportunities for students:

- PATH (Promoting Access to Help)
- Boys and Girls Club of Sturgeon Bay
- YMCA of Sturgeon Bay
- Crossroads at Big Creek
- Bay Shore Outfitters

The needs of special education students are well met by the district.

Sturgeon Bay and three other districts participate in programming at the area hospital.

Special Education Students participate in community based instruction and functional/daily living skills to foster independence.

Activities include:

- School Store (Sunrise Elementary School and Sturgeon Bay High School)
- Weekly Daily Living Skills Instruction in Cooking and Caring for Home (PATH)
- Water Safety: Partnering with the YMCA and Bay Shore Outfitters (Monthly)
- Functional Skills Instruction: Menu Reading and Ordering and Weekly Grocery Shopping (Monthly)
- Holiday Events: Holiday Swag Building and Selling; Small gift creation including Bird Feeders, Food/Desserts, Flowers, etc.

Inclusion of special education students is stressed and a co-teaching model is implemented at each grade level.

District efforts to encourage student participation include:

- Weekly professional learning communities (by grade level and content area)
- Common planning time between regular education and special education teachers (weekly)
- Inservice Sessions (4 sessions per year)
- Open House
- Annual Transition Events (Grade 2-3; Grade 5-6; Grade 8-9)
- Freshman Orientation
- Student Handbook Information and Announcements
- Weekly Parent Newsletters by Building Principal
- Social Media Updates and Events
- WISPI Parent Engagement Newsletters and Events

## **Methods, Practices, Curriculum, and Materials Used in School Counseling**

The District employs four school counselors on the following basis:

- Grades 4k-2: One Full-Time Counselor
- Grades 3-5: One Full-Time Counselor
- Grades 6-9: One Full-Time Counselor
- Grades 10-12: One Full Time Counselor

The school counselors are implementing the Wisconsin Comprehensive School Counseling Model.

Specific highlights of the counseling program are outlined as follows:

### **Grades 4k-2: Sawyer Elementary School**

- 504 Building Coordinator
- Collaboration with community agencies (CCS, STRIDE, BBBS)
- SAEBRs Coordination
- Crisis Response
- Student monitoring
- Parent education
- PBIS Tier 2 Coach
- District Leadership Team, Building Leadership Team, Student Study Team
- Attendance and Data Collection Team with Building Principal

### **Grades 3-5: Sunrise Elementary School**

- 504 Building Coordinator
- Collaboration with community agencies (CCS, STRIDE, BBBS)
- SAEBRs Coordination
- Small Group Counseling as needed
- Classroom Instruction: Second Step Curriculum
- Crisis response
- Student monitoring
- Parent education
- Assessment Coordinator
- LEA (Local Educational Agency) representative
- PBIS (Positive Behavioral Interventions and Supports) Tier 2 Coach and Tier 2 CICO (Check-In/Check-Out) Support
- District Leadership Team, Building Leadership Team, Student Study Team
- Attendance and Data Collection Team with Building Principal
- SEL Team Member (Well-Being for All and Restorative Practices)

### **Grades 6-9: TJ Walker Middle School and Sturgeon Bay High School**

- 504 Building Coordinator
- Collaboration with community agencies (CCS, STRIDE, BBBS)
- SAEBRs Coordination
- Small Group Counseling as needed
- Classroom Instruction: Second Step Curriculum
- Crisis response
- Student monitoring
- Parent education
- Scheduling
- Post-Secondary Planning
- Assessment Coordinator
- Academic Support (During and After School)
- Middle School Leadership Team
- PBIS (Positive Behavioral Support) Tier Two Team
- District Leadership Team
- SEL Team Member (Well-Being for All and Restorative Practices)



## **Grades 10-12: Sturgeon Bay High School**

- 504 Coordinator
- District Leadership Team
- SEL Team Member
- Individual Counseling
- Crisis Response
- Coordinate Homeroom Lessons and activities: Can do You Curriculum
- Graduation Progress Coordinator
- Awards Presentation Coordinator
- ACP (Academic and Career Planning) Coordinator
- Scholarships
- Assessment Coordinator (AP, PSAT, ACT, Pre-ACT, and WI Forward)
- Collaboration with Community Agencies
- LEA (Local Educational Agency) representative
- Master Scheduling and Individual Scheduling
- Post-Secondary Team Planning
- Building Leadership Team
- Youth Apprenticeship Liaison
- Dual Credit and Youth Options Coordinator
- Virtual Learner Liaison

## **Participation Trends and Patterns and School District Support of Athletic, Extracurricular, and Recreational Activities**

### **A. Athletics**

The School District follows The Pupil Nondiscrimination Guidelines for Athletics, joint publication of the Department of Public Instruction and the Wisconsin Interscholastic Athletic Association. As a result of these guidelines and current practice, programs meet the following basic criteria:

They are comparable in scope.

They are comparable in type.

Participation of males/females is representative of their enrollment in the district.

## **Middle School Athletics**

### Male Athletics

Basketball ( )  
Cross Country ( )  
Track ( )  
Football ( )  
Wrestling ( )

### Female Athletics

Basketball ( )  
Cross Country ( )  
Track ( )  
Volleyball ( )  
Wrestling ( )

## **High School Athletics**

### Male Athletics

Basketball (32)  
Baseball (28)  
Cross Country (5)  
Track (15)  
Football (32)  
Wrestling (8)  
Golf (18)  
Soccer (22)

### Female Athletics

Basketball (16)  
Softball (10)  
Cross Country (8)  
Track (8)  
Volleyball (30)  
Wrestling (8)  
Golf (7)  
Soccer (28)

The following comments were presented by the administration:

The middle school sports are not affiliated with the WIAA.

The athletic director is familiar with the DPI/WIAA nondiscrimination guidelines.

There is a no-cut policy at the middle school.

B. Other Activities

Elementary School

Year	Male	Female	Minority	Spec. Ed	Total
2022-23	5	6	4	1	11
2023-24	18	11	14	10	29
Totals	23 (57.5%)	17 (42.5%)	18 (45%)	11 (27.5%)	40

Findings: The one elementary after-school activity offered by the school is male dominated.

There are also after-school activities offered by the local YMCA, Boys & Girls Club, and other community youth sports groups, although those are not formally offered by the school district.

High School Athletic Participation – Out of 20 Clubs/Activities

Male Athletics – 145 (34%)

Minority – 27 (6.2%)

Female Athletics – 286 (66%)

Special Education – 20 (4.6%)

Findings: Although it can vary to a degree by activity or sports season, there are more females than males involved with high school athletics, clubs, and activities.

**Trends and Patterns in Awarding Scholarships and Other Forms of Recognition and Achievement Provided or Administered by the District**

A. Scholarships

There is a process in place to ensure that all students and their parents are aware of scholarships and the application process. A few of these strategies are as follows:

- Senior class meeting
- Emails to students
- High school newsletters
- Online list of scholarships - Door County Network
- Dedicated webpage on high school portion of the district website.

Summary of Scholarships by Number of Students

<u>Year</u>	<u>Male</u>	<u>Female</u>	<u>Minority</u>	<u>Spec. Ed</u>	<u>Total</u>
2024	44	54	5	3	98
	44.9%	55.1%	5.1%	3.1%	

Findings: Scholarships are female dominated.  
Minority students are receiving scholarships, although we would like to see more apply for and receive scholarships.  
Special education students are receiving scholarships, although we would like to see more apply for and receive scholarships.

## **Summary of Specific Legal Requirements**

The following is a summary of the district's current status regarding the requirements of Chapter PI 9, Wisconsin Administrative Code:

- PI 9.03 - Policies prohibiting discrimination against pupils.

All policies are in place.

- PI 9.04 - Complaint procedure.

The district has a complaint officer, and the complaint procedure is in place.

- PI 9.05- Class 1 legal notice & printed materials.

A Class 1 legal notice is published annually. Printed materials contain the nondiscrimination statement.

- PI 9.06 - Evaluation, opportunity for input, opportunity to review the report.

This report covers the three designated areas of nondiscrimination required by the Wisconsin Department of Public Instruction-counseling, athletics and other activities, scholarships and other awards.

A legal notice was published announcing the self evaluation and soliciting input from anyone in the school district.

A legal notice will be published after the school board approves the report indicating that anyone in the school district may review the report. A copy of PI 1198 will be sent to the Wisconsin Department of Public Instruction indicating that the self evaluation is complete.

## **Recommendations**

Monitor athletics and activities on an ongoing basis. Review data by individual activity over at least a three-year period. Segregate data by male/female, minority, and special education. Watch for trends that may develop and take corrective action if necessary.

**Legal Reference:**            **PI 9.06(e)**

Monitor scholarships and other awards on an annual basis. Review data over at least a three-year period. Segregate data by male/female, minority, and special education. Watch for trends that may develop and take corrective action if necessary.

**Legal Reference:**            **PI 9.06(f)**

## UPDATE/REPLACE SCANNED ITEMS

### Chapter PI9

#### PUPIL NONDISCRIMINATION

PI9.01 Discrimination prohibited.  
 PI9.02 Definitions.  
 PI9.03 Policies.  
 PI9.04 Complaint procedure.

PI9.05 Public notice.  
 PI 9.06 Evaluation.  
 PI9.07 Reporting.  
 PI9.08 State superintendent

**PI 9.01 Discrimination prohibited.** This chapter establishes procedures for compliance with s. 118.13, Stats., which provides that no person may be denied admission to any public school or be denied participation in, be denied the benefits of or be discriminated against in any curricular, extracurricular, pupil services, recreational or other program or activity because of the person's sex, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation or physical, mental, emotional or learning disability. This chapter does not intend to prohibit the provision of special programs or services based on objective standards of individual need or performance to meet the needs of pupils, including gifted and talented, special education, school age parents, bilingual bicultural, at risk and other special programs; or programs designed to overcome the effects of past discrimination.

**History:** Cr. Reg., October, 1986, No. 370, eff. 11-1-86.

#### PI 9.02 Definitions. In this chapter:

(1) "Bias" means an inclination for or against a person or group of persons based, in whole or in part, on sex, race, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation or physical, mental, emotional or learning disability, that inhibits impartial or objective judgment affecting pupils.

(2) "Board" means the school board in charge of the public schools of a district.

(3) "Curricular program or activity" means a particular course or courses of study within the scope of the curriculum.

(4) "Department" means the Wisconsin department of public instruction.

(5) "Discrimination" means any action, policy or practice, including bias, stereotyping and pupil harassment, which is detrimental to a person or group of persons and differentiates or distinguishes among persons, or which limits or denies a person or group of persons opportunities, privileges, roles or rewards based, in whole or in part, on sex, race, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation or physical, mental, emotional or learning disability, or which perpetuates the effects of past discrimination.

(6) "Extracurricular program or activity" means an activity not falling within the scope of the curriculum and includes all organized pupils' activities which are approved or sponsored by the school board whether on or off school property.

(7) "National origin" includes pupils whose dominant language is other than English.

(8) "Pregnancy" includes any pregnancy-related condition.

(9) "Pupil harassment" means behavior towards pupils based, in whole or in part, on sex, race, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation or physical, mental, emotional or learning disability which substantially interferes with a pupil's school performance or creates an intimidating, hostile or offensive school environment.

(10) "Pupil services" means a program of pupil support services and activities including counseling, health and nursing, psychological and social work services.

(11) "Recreational program or activity" means any leisure time activity for school age children approved or sponsored by the school board and includes city recreational programs which are administered by a school board.

(12) "Sexual orientation" has the meaning defined in s. 11.132 (13m), Stats.

(13) "State superintendent" means the superintendent of public instruction for the state of Wisconsin.

(14) "Stereotyping" means attributing behaviors, abilities, interests, values and roles to a person or group of persons on the basis, in whole or in part, of their sex, race, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation or physical, mental, emotional or learning disability.

**History:** Cr. Register, October, 1986, No. 370, eff. 11-1-86.

**PI 9.03 Policies.** (1) Each board shall develop policies prohibiting discrimination against pupils. The policies shall include the following areas:

(a) Admission to any school, class, program or activity. This does not prohibit placing a pupil in a school, class, program or activity based on objective standards of individual performance or need.

(b) Standards and rules of behavior, including pupil harassment.

(c) Disciplinary actions, including suspensions and expulsions.

(d) Acceptance and administration of gifts, bequests, scholarships and other aids, benefits, or services to pupils from private agencies, organizations or persons.

(e) An instructional and library media materials selection policy consistent with s. 121.02 (1)(b), Stats., and s. PI 8.01 (2)(b).

(f) Methods, practices and materials used for testing, evaluating and counseling pupils. This does not prohibit the use of special testing or counseling materials or techniques to meet the individual needs of pupils.

(g) Facilities. This does not prohibit separate locker rooms, showers and toilets for males and females, but the separate facilities must be comparable.

(h) Opportunity for participation in athletic programs or activities. This does not prohibit separate programs in interscholastic athletics for males and females, but the programs shall be comparable in type, scope and support from the school district.

(i) School sponsored food service programs under 42 USC 1751 et seq.

(2) Existing board policies which meet the requirements of this chapter, including those adopted by the board in compliance with federal statutes such as Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section





504 of the Rehabilitation Act of 1973, may be incorporated into the policies required under this chapter. These policies shall be included in those presented for public hearing and commentary under sub. (3).

(3) The policies shall be adopted by the board following a public hearing or an opportunity for public commentary at a board meeting.

History: Cr. Register, October, 1986, No. 370. eff. 11-1-86.

#### PI 9.04 Complaint procedure. Each board shall:

(1) Designate an employee of the school district to receive complaints regarding discrimination under s. 118.13, Stats., and this chapter.

(2) Establish a procedure for receiving and resolving complaints from residents of the school district or aggrieved persons under s. 118.13, Stats., and this chapter, including a provision for written acknowledgement within 45 days of receipt of a written complaint and a determination of the complaint within 90 days of receipt of the written complaint unless the parties agree to an extension of time; except that:

(a) Appeals under 20 USC 1415 and eh. 115, Stats., relating to the identification, evaluation, educational placement, or the provision of a free appropriate public education of a child with an exceptional educational need shall be resolved through the procedures authorized by eh. 115; subch. V, Stats.

(b) Complaints under 20 USC 1231e-3 and 34 CFR 76.780-76.782, commonly referred to as EDGAR complaints, that the state or a subgrantee is violating a federal statute or regulation that applies to a program shall be referred directly to the state superintendent.

(3) Notify a complainant of the right to appeal a negative determination by the school board to the state superintendent and of the procedures for making the appeal

History: Cr. Register, October, 1986, No. 370. eff. 11-1-

#### PI 9.05 Public notice. Each board shall:

(1) Annually provide public notice of board policies on pupil nondiscrimination including the name and address of the designated employee under s. PI 9.01- (1) and the complaint procedure under s. PI 9.04 (2). The notice shall bear a class 1 legal notice under eh. 985, Stats.

(2) Include a pupil nondiscrimination statement on pupil and staff handbooks, course selection handbooks and other published materials distributed to the public describing school activities and opportunities.

(3) Include the complaint procedure in pupil and staff handbooks.

History: Cr. Register, October, 1986, No. 370. eff. 11-1-86.

**PI 9.06 Evaluation.** (1) In order to provide the information necessary for the state superintendent to report on the compliance with s. 118.13, Stats., as required under s. 118.13 (3) (a) 3. Stats., each board shall evaluate the status of nondiscrimination and equality of educational opportunity in the school district at least once every 5 years on a schedule established by the state superintendent. The evaluation shall include the following:

- (a) School board policies and administrative procedures.
- (b) Enrollment trends in classes and programs.
- (c) Methods, practices, curriculum and materials used in instruction, counseling, and pupil assessment and testing.
- (d) Trends and patterns of disciplinary actions including suspensions, expulsions, and banding of pupil harassment.
- (e) Participation trends and patterns and school district support of athletic, extracurricular and recreational activities.
- (f) Trends and patterns in awarding scholarships and other forms of recognition achievement provided or administered by the school district.

(g.) School district efforts to achieve equality of educational opportunity and nondiscrimination.

(2) The board shall provide an opportunity for participation in the evaluation by pupils, teachers, administrators, parents and residents of the school district

(3) The board shall prepare a written report of the evaluation which shall be available for examination by residents of the school district.

History: Cr. Register, October, 1986, No. 370. eff. 11-1-86.

**PI 9.07 Reporting.** Each board shall submit the following to the department:

(1) Copies of policies and procedures under s. 118.13 (2)(a), Stats., and ss. PI 9.03 and 9.04, and notices under s. PI 9.05, upon request of the state superintendent

(2) An annual compliance report, including the name of the designated employee under s. PI 9.04 (1); and the number of complaints received during the year, a description of each complaint and its status.

(3) A copy of the written report of the evaluation conducted under s. PI 9.06.

Note: Form PI 1197, Compliance Report - Pupil Nondiscrimination, may be obtained from the Department of Public Instruction, Division of Multicultural Affairs, P.O. Box 7841, Madison, WI 53707.

History: Cr. Register, October, 1986, No. 370. eff. 11-1-86.

**PI 9.08. State superintendent.** (1) The state superintendent shall:

(a) Decide appeals of board decisions made under s. 118.13 (2) (a), Stats., and this chapter as follows:

1. The complainant may appeal a negative determination of the board to the state superintendent within 30 days of the board's decision.

2. The complainant may appeal directly to the state superintendent if the board has not complied with the provisions of s. PI 9.04(2).

3. The state superintendent shall utilize the procedures under eh. PI 1 to resolve appeals under this subsection.

4. If the state superintendent finds that the board violated s. 118.13, Stats., or this chapter, the state superintendent shall issue an order to comply which includes a requirement that the board submit a corrective action plan, including a schedule, within 30 days of the board's receipt of the order.

5. The state superintendent shall refer a complaint to the board for resolution if it has not been filed with the board or if the complaint is currently under consideration by the board under the complaint procedure required by s. PI 9.04.

(b) Include in the department's biennial report under s. 15.04 (1) (d), Stats., information on the status of school district compliance with s. 118.13, Stats., and school district progress toward providing reasonable equality of educational opportunity and nondiscrimination for all pupils in Wisconsin.

(2) The state superintendent may:

(a) Provide technical assistance to school districts.

(b) Review the policies established by the board under ss. PI 9.03 and 9.04.

(c) Review school district programs, activities and services to determine whether boards are complying with this chapter and with s. 118.13, Stats. The department may review school districts on a schedule which corresponds with the audit of compliance with school district standards under s. 121.02 (2), Stats. The scheduling of reviews does not prohibit the state superintendent from conducting an inquiry into compliance with this chapter upon receipt of a complaint.

History: Cr. Register, October, 1986, No. 370. eff. 11-1-86.



## Chapter PI 26

### EDUCATION FOR EMPLOYMENT PLANS AND PROGRAM

PI 26.01 Applicability and purpose.  
PI 26.02 Definitions.  
PI 26.03 Education for employment program.

PI 26.0-t General requirements for school boards.  
PI 26.05 Professional approval.

**Note:** Chapter PI 26 was repealed and recreated by CR 15-025 Register November 2015 No. 719, eff. 12-1-15.

**PI 26.01 Applicability and purpose.** (1) Under s. 121.02 (1) (m), Stats., every school board shall provide access to an education for employment program approved by the state superintendent. Under s. 115.28 (59), Stats., the state superintendent shall ensure that every school board is providing academic and career planning services to pupils enrolled in grades 6 to 12 in the school district beginning in the 2017-18 school year.

(2) This chapter establishes the requirements for education for employment programs. The purpose of education for employment programs is to do all of the following:

- (a) Prepare elementary and secondary pupils for future employment.
- (b) Ensure technological literacy; to promote lifelong learning.
- (c) Promote good citizenship.
- (d) Promote cooperation among business, industry, labor, postsecondary schools, and public schools.
- (e) Establish a role for public schools in the economic development of Wisconsin.

(3) The purpose of academic and career planning services is to assist pupils with planning and preparing for opportunities after graduating from high school. These opportunities may include postsecondary education and training that leads to careers. This chapter describes school districts' academic and career planning responsibilities while allowing school districts to determine how they meet those responsibilities.

History: CR 15 25: cr. Register November 2015 No. 719, eff. 12-1-15.

#### PI 26.02 Definitions. In this chapter:

(1) "Academic and career plan" means a comprehensive plan developed and maintained by a pupil that includes the pupil's academic, career, personal, and social goals and the means by which the pupil will achieve those goals both before and after high school graduation.

(2) "Academic and career planning services" means the activities, instruction, resources, and opportunities provided by a school district to assist a pupil with developing and implementing an academic and career plan.

(3) "Academic and career planning software tool" means the computer software program procured by the department under s. 115.28 (59) (b), Stats., to provide academic and career planning services, or a similar computer software program that allows pupils to download their academic and career plan.

(4) "Child with a disability" has the meaning given in s. 115.76 (5), Stats.

(5) "Department" means the Wisconsin department of public instruction.

(6) "Education for employment program" means the program under s. 121.02 (1) (m), Stats.

(7) "Individualized education program" has the meaning given in s. 115.76 (9), Stats.

(8) "Parent" includes a guardian.

(9) "Pupil postsecondary outcomes" means the activities a pupil pursues after high school graduation, which may include: pursuing postsecondary education and training, including at a technical college, college, or university; entering the workforce; serving in the armed forces; or undertaking other personal growth and development activities.

(10) "School board" has the meaning given in s. 115.001 (7), Stats.

(11) "State superintendent" means the state superintendent of public instruction.

History: CR 15 25: cr. Register November 2015 No. 719, eff. 12-1-15.

#### PI 26.03 Education for employment program.

(1) An education for employment program shall include a long-range plan approved by the school board and developed by a team of school district staff and community stakeholders, which may include businesses, postsecondary education institutions, and workforce development organizations. The long-range plan shall include all of the following:

(a) An analysis of local, regional, and state labor market need; and the educational and training requirement; for occupations that will fill those needs.

(b) A process used to engage parents in academic and career planning. The process shall do all of the following:

1. Inform parents in each school year about what academic and career planning services their child receives.
2. Provide parents with multiple opportunities during each school year to participate in their child's academic and career planning.
3. Update parents throughout the school year on the progress of their child's academic and career planning.

(c) A description of all of the following:

1. How, in each year of the plan, the school district will support pupils in academic and career planning, including meeting the requirements under subs. (2) and (3).
2. The career and technical education provided in the school district.
3. The professional development provided to staff to assist staff with delivering academic and career planning services to pupils in grades 6 to 12.
4. How the education for employment program will meet the requirements of s. 121.02 (1) (m), Stats.

(d) A strategy to engage businesses, postsecondary education institutions, and workforce development organizations in implementing the education for employment program.

(2) An education for employment program shall provide pupils with information and opportunities that lead to all of the following:

(a) Career awareness at the elementary grade levels, including developing an understanding of the following:

1. Why people work.
2. The kinds of conditions under which people work.
3. The levels of training and education needed for work.
4. Common expectations for employees in the workplace.

5. How expectations at school are related to expectations in the world of work.

(b) Career exploration at the middle school grade levels, including developing an understanding of the continuum of careers across work environments, duties, and responsibilities and how a pupil's personal interests and skills relate to those careers. Career exploration may also include work-based learning experiences and career research identifying personal preferences in relation to occupations and careers pupils may pursue.

(c) Career planning and preparation at the high school grade levels, which shall include the following:

L Conducting career research to identify personal preferences in relation to specific occupations.

2. School-supervised, work-based learning experiences.

3. Instruction in career decision making.

4. Instruction that provides for the practical application of academic skills, applied technologies, economics, including entrepreneurship education and personal financial literacy.

5. Pupil access to career and technical education programs, including programs at technical colleges.

6. Pupil access to accurate national, regional, and state labor market information, including labor market supply and demand.

7. Instruction and experience in developing and refining the skills and behaviors needed by pupils to obtain and retain employment.

(3) Beginning in the 2017-18 school year, an education for employment program shall provide pupils in grades 6 to 12 with academic and career planning services, including providing each pupil with all of the following:

(a) Individualized support, appropriate to the pupil's needs, from school district staff to assist with completing and annually updating an academic career plan.

(b) If a pupil is a child with a disability, the pupil's academic and career plan shall be made available to the pupil's individual education program team. The pupil's individualized education program team may, if appropriate, take the pupil's academic and

career plan into account when developing the pupil's transition services under s. 115.787 (2) (g), Stats.

(c) Access to an academic and career planning software tool that allows pupils to engage in career exploration and career planning and preparation.

(d) Access to a formal process for connecting pupils to teachers and other school staff for assistance with the development and implementation of each pupil's academic and career plan.

History: CR 15-025: cr. Register November 2015 No. 719, eff. 12-1-15.

#### PI 26.04 General requirements for school boards.

The school board shall do the following:

(1) Indicate on a pupil's transcript the name of each course completed by the pupil, the number of high school credits earned for each course, whether a course is eligible for postsecondary credit, and, if applicable, a course's participating postsecondary institution.

(2) Annually review and, if necessary, update the long-range plan and education for employment program under s. PI 26.03. This review shall evaluate pupil postsecondary outcomes. At the conclusion of the review, the school board shall prepare a report on the school district's education for employment program. The report shall describe the education for employment program's current progress and future goals related to improving pupil postsecondary outcomes.

(3) Publish its long-range plan under s. PI 26.03 (1) and the report under sub. (2) on the school district's website.

(4) Annually notify parents of its education for employment program. The notice shall inform parents of the information and opportunities available to pupils under s. PI 26.03 (2) and (3), including the availability of programs at technical colleges.

History: CR 15-025: cr. Register November 2015 No. 719, eff. 12-1-15; correction in (4) made under s. 35.17, Stats., Register November 2015 No. 719.

**PI 26.05 Program approval.** A program shall be approved by the state superintendent as long as the program complies with all of the requirements of this chapter and ss. 115.28 (59) and 121.02 (1) (m), Stats.

History: CR 15-025: cr. Register November 2015 No. 719, eff. 12-1-15.

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STATE OF WISCONSIN  
BROWN COUNTY

GIBRALTAR AREA SCHOOLS

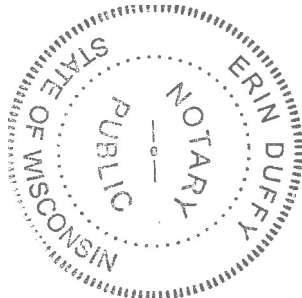
3924 STATE HIGHWAY 42  
FISH CREEK WI 542129625

Being duly sworn, doth depose and say that she/he is an authorized representative of the Door County Advocate, a newspaper published in Door County, Wisconsin, and that an advertisement of which the annexed is a true copy, taken from said paper, which was published therein on:

Account Number: GWM-GIBR20  
Order Number: 0001569315  
No. of Affidavits: 5  
Total Ad Cost: \$59.67  
Published Dates: 09/10/16

(Signed) Aks (Date) 9/13/2016  
Legal Clerk

Signed and sworn before me



(J)

My commission expires 5-25-18

GIBRALTAR AREA SCHOOLS

Re: Student Nondiscinnation

GANNETT WI MEDIA  
435 EAST WALNUT ST.  
PO BOX23430  
GREEN BAY, WI 54305-3430

**GANNETT**  
Wisconsin Media  
Delivering Customers. Driving Results.

PHONE 1-877-943-0446  
FAX 877-943-0443  
EMAIL [legals@doorcountyadvocate.com](mailto:legals@doorcountyadvocate.com)

NOTICE OF STUDENT  
NONDISCRIMINATION

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**Abstract**

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STATE OF WISCONSIN  
BROWN COUNTY

GIBRALTAR AREA SCHOOLS

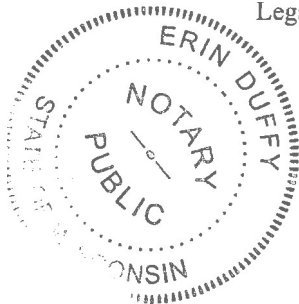
3924 STATE HIGHWAY 42  
FISH CREEK WI 542129625

Being duly sworn, doth depose and say that she/he is an authorized representative of the Door County Advocate, a newspaper published in Door County, Wisconsin, and that an advertisement of which the annexed is a true copy, taken from said paper, which was published therein on:

Account Number: GWM-GIBR20  
Order Number: 0001569201  
No. of Affidavits: 5  
Total Ad Cost: \$213.34  
Published Dates: 09/10/16

(Signed) AKS (Date) 9/13/2016

Legal Clerk



Signed and sworn before me

11

My commission expires

5-25-17

GIBRALTAR AREA SCHOOLS

Re: Notice of School Records

GANNETT WI MEDIA  
435 EAST WALNUT ST.  
PO BOX 23430  
GREEN BAY, WI 54305-3430

**GANNETT**  
Wisconsin Media  
Delivering Customers. Driving Results.

PHONE 1-877-943-0446  
FAX 877-943-0443  
EMAIL [legals@doorcountyadvocate.com](mailto:legals@doorcountyadvocate.com)



**Figure 1**

§99.31(8)(7)) ..  
 • To parents of an eligible student if the student is a dependent for IRS tax purposes!! (§99.31(a)(8))  
 • To comply with a Judicial order or lawful subpoena. subpoena (§99.31(a)(9))  
 • To appropriate officials in connection with a health or safety emergency, subject to §99.36 (§99.31(a)(10))  
 • Information on the system has designated!!  
 • All directory information under §99.37. (§99.31(a)(11))

• Parents of a student with a U.S. Department of Education Title I  
 • If the failure by the District to comply with the requirements of FERPA The name and address of the Office that administers FERPA is Family Policy Education, 400 Maryland Avenue, S.W., Washington, DC 20020-9920  
 • The Board of Education's records, policy and procedures are available upon

Notification of Rights Under the Protection of Pupil Rights Amendment (PPRA)

PPRA affords parents and eligible students certain rights regarding the District's conduct of surveys, collection and use of information for marketing purposes, and certain physical exams. These include the right to inspect and consent or opt out of:

- Political affiliations;
- Mental and psychological problems, including embarrassing to the student and his/her family;
- Sex behavior and attitudes;
- Illegal, antisocial, self-incriminating and delinquent behavior;
- Critical appraisals of other individuals with whom respondents have close family relationships;
- Legally recognized privileged or analogous relationships, such as those of lawyer, physician and minister;
- Religious practices, affiliations or beliefs; or
- Income other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).

2. Activities involving the collection, disclosure, or use of personal information collected from students for the purpose of marketing.

3. Any non-emergency, invasive, physical examination or screening.

4. If rights transfer from the parents to a student who is 18 years old or an emancipated minor under State law, each District will have developed (and adopted) policies, in consultation with parents, regarding these rights, as well as arrangements to protect student privacy in the administration of protected information surveys and the collection, disclosure, or use of personal information for marketing, sales, or other distribution.

Each District will directly notify parents of these policies at least annually at the start of each school year and after any substantive change. Each District will also directly notify, through U.S. Mail or email, parents of students who are scheduled to participate in the specific activities or surveys noted below and will provide an opportunity for the parent to opt his or her child out of participation of the specific activity or survey. Each District will make this notification to parents at the beginning of the school year if the District has identified the specific dates of the activities or surveys at that time. For surveys and activities scheduled after the school year starts, parents will be provided reasonable notification of the planned activities and surveys as noted above and be provided an opportunity to opt their child out of such activities and surveys. Parents may have pending court orders or legal issues that may prevent surveys.

RUN Sep. 10, 2018 WNAIXLP

have any or all of  
maison released,  
school in writing  
notice being provided  
has designated, will  
notice with § 118  
District must notify parents, legal guardian  
ans or guardians and items of the categories of information, which the Board has  
designated as confidential or exempt from disclosure.

# innr atnuntv Ahu tt

STATE OF WISCONSIN  
BROWN COUNTY

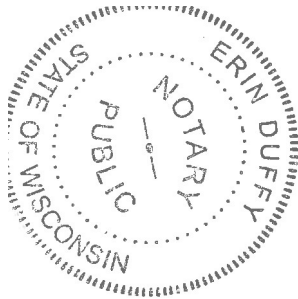
GIBRALTAR AREA SCHOOLS

3924 STATE HIGHWAY 42  
FISH CREEK WI 542129625

Being duly sworn, doth depose and say that she/he is an authorized representative of the Door County Advocate, a newspaper published in Door County, Wisconsin, and that an advertisement of which the annexed is a true copy, taken from said paper, which was published therein on:

Account Number: GWM-GIBR20  
Order Number: 0001569351  
No. of Affidavits: 5  
Total Ad Cost: \$71.81  
Published Dates: 09/10/16

(Signed) AKS (Date) 9/13/2016  
Legal Clerk



Signed and sworn before me

ERIN DUFFY

My commission expires

5-25-18

GIBRALTAR AREA SCHOOLS

Re: Notice of Child Find

NOTICE OF CHILO FIND ACTMTY  
Oislncls of Gibraltar

Sturgeon Bay  
Washington Island

School dislrCIS have a duty to locate, identify, and evaluate all resident children with a disability, regardless of the severity of their disability. Each District has a special education screening program.

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iooauls and --.S childnln lll t'III al- j

**lowing groups:** children **b9klW «llllll-**  
entry age; children **ente,ng -sd!Oo/iDr**  
the kind fire; chikreo iuranly enrolled in public and private schools, all transfer pupils; school-age children who are eligible to attend school but who are not at-

tending school and who are residents of the District. Upon request, the District will see any child to determine whether a special education referral is appropriate. If you have specific concerns regarding a young child's speech, hearing, vision, walking, learning, or behavior, please contact the **Oil bve** Director of Special Education/DesiQooe (see below). Also available to qualified students with identified disabilities under Section 504 of the Rehabilitation Act of 1973 are reasonable accommodations. A qualified child with a disability under 504 is any child who: 1) has a physical or mental **!nJ18itment** which **8Ubsb/lllly fmit& 008** (more than one life activities), has a record of such impairment, and 3) is regarded as **l18Vi119** such an impairment. Major life activities include **canng \*tor** **o'''e seif**, performing manual tasks,

speaking, **a ngspeaking**, **<lnuatty The Dia.liict** conducts developmental screening of preschool children. A physician, nurse, psychologist, social worker or administrator of a social agency, **who --.ably** that a child was brought to him or her for services is a child with a disability has a legal duty to report the child to the District in which the child resides.

The District shall **QM!** to the parents of a child **Wilf1a dSabiUty**, once a year but also upon the child's initial referral or parental request for evaluation, upon the first occurrence of the filing of a request for a hearing under § 115.80, **Wis.** **-Stats**, and upon request by the child's parent (if a full explanation is an-

derstandable manner, and in the native language of the child's parents unless it clearly is not feasible to do so, of the procedural safeguards available under this section and under applicable Federal **law nilat!1a !O** all of the following:  
4. Independent educational evaluation

4. Access to educational records  
5. Opportunity to present and present complaints, including the period in which the child's parents may request a hearing and the opportunity for the local educational agency to resolve the issue presented by the request

6. The child's placement during pendency of due proceedings.  
7. Procedures for pupils who are subject to placement in interim alternative educational settings under 20 USC 1415 (k).  
8. Requirements for the unilateral placement by parents of pupils in private

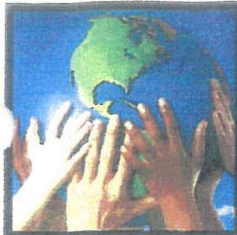
**expense.**

**10** rings under s. 11.80. Wis. Stats.  
11. Civil actions, including the period in which to file a CMI action.  
12. Attorney fees.  
The District maintains pupil records, including

**ltar** Schools  
ShaunYoung  
) 284  
**I<aihe ls**  
(920) 743/6282  
Southern Door  
County Schools  
8renda Shimon  
(0)826-7311

s :iders ools  
(920) 746-2804

**1 :'' nScil- J;.**  
(920) 84-7-2507  
RUN Sep 10, 2016 WNAALP



# Four Components of A Comprehensive School Counseling Program



Guidance Curriculum	Individual Student Planning	Responsive Services	System Support
<p>Provides guidance content in a systematic way to all students K-12.</p> <p><b>Purpose</b> Student awareness, skill development, and appreciation of skills needed in everyday life.</p> <p><b>Areas Addressed.</b> Self-esteem development • Motivation to achieve • Decision Making, goal setting, planning, and problem solving skills • Interpersonal effectiveness • Communication skills • Cultural diversity • Responsible behavior • Educational Planning • Knowledge of career opportunities • Knowledge of post secondary opportunities</p> <p><b>Counselor Role</b> • Structured groups • Consultation • Guidance curriculum implementation</p>	<p>Assists students in planning, monitoring, and <u>managing</u> their personal and career development.</p> <p><b>Purpose</b> Student educational and career planning, decision making, and goal setting.</p> <p><b>Areas Addressed</b> <i>Educational/Academic</i> • Acquisition of study skills • Awareness of educational opportunities • Appropriate course selection • Lifelong learning • Utilization of test data <i>Career</i> • Knowledge of career opportunities • Knowledge of post secondary options • Need for positive work habits <i>Personal-Social</i> • Development of healthy self-concepts • Development of adaptive and adjustive social behavior</p> <p><b>Counselor Role</b> • Assessment • Planning • Placement</p>	<p>Addresses the immediate concerns of students.</p> <p><b>Purpose</b> Prevention and intervention.</p> <p><b>Areas Addressed</b> • Academic concerns • School related concerns - Tardiness - Absences and truancy - Misbehavior - School avoidance - Drop-out prevention • Relationship concerns • Abuse issues • Grief/loss death • Substance abuse • Sexuality issues • Coping with stress</p> <p><b>Counselor Role</b> • Individual and small group counseling • Consultation • Referral</p>	<p>Includes program, staff and school support activities.</p> <p><b>Purpose</b> Program delivery and support.</p> <p><b>Areas Addressed</b> • Guidance program development • Parent education • Teacher / administration consultation • Staff development for educators • School improvement planning • Professional development • Research and publishing • Community outreach • Public relations</p> <p><b>Counselor Role</b> • Program management • Consultation • Coordination</p>

## Business Manager Update

8/21/24

Jake Holtz



I don't think I am going to get into too much on this report, as you'll be hearing a lot from me in the budgetary pre-meeting. While we will be covering the overall budget for 2024-25, as is usually the case, there have been very few minor changes, let alone major changes, since you approved the preliminary budget in June. Instead, I expect we'll continue to lay the groundwork for some of the things we'll be looking to discuss over the next year. Among those talking points:

- Retiree Health Insurance (both for teachers still on this benefit and non-teachers/admin)
- The bottom of our teacher salary ladder/starting wage
- Sick bank payout at (or around) retirement

Certainly we'll cover a few other things but, those are the big points I would expect we'll cover. As far as other updates are concerned, here's the short list.

### 1. End of year

As I write this, we're still trying to finalize a couple of details but, I expect us to end they year about \$25,000 in the black. The books are pretty well closed and we're on the other side of the auditors being in house. There is still a ways to go until we officially cross the finish line (won't be *officially* done until Decemberish) but the checklist is pretty well done.

### 2. Wrestling

At the June WIAA meeting the WIAA board approved a completely separate tournament series for Girls Wrestling and a mandate that "requires a sponsored girls' school program to only wrestle against other schools that sponsor a girls' wrestling program, starting in 2025-26." I bring this up because, as this change happens, it could be wise to keep an eye on and potentially examine the positions on our extra-curricular pay schedule to see if we need to have separate girls and boys wrestling head coaches. Any conversation is a ways away (February compensation committee) but, I wanted to make sure to give you a heads up as I found out about it.

# SCHOOL DISTRICT OF STURGEON BAY

## ANCHORED IN EXCELLENCE

1230 Michigan Street | Sturgeon Bay, WI 54235

Phone: 920-746-2800 | Fax: 920-746-3888

### **August 21, 2024, Board of Education Meeting Superintendent Report**

Prepared by Dan Tjernagel, Superintendent of Schools

*Updated for the meeting packet August 9, 2024; Additional updates added later are in section four*

#### **1. Teaching & Learning**

- a. **CESA 7 PAC Executive Committee Meeting** – On Monday, August 5, I attended the PAC Executive Committee meeting in Green Bay. I serve as the CESA 7 small schools' representative. The executive committee works with the executive staff at CESA 7 to plan the monthly superintendent meetings throughout the school year.

Among the highlights, we plan to continue the legislative breakfasts every other month, and we are going to have an AI theme for the September meeting since that is obviously a timely topic and one that continues to develop rapidly. We're asking each superintendent to bring someone from their district who is involved with technology to share and hear ideas that we can all take back to our districts.

#### **2. Community Engagement**

- a. **DCEDC Board** - The monthly DCEDC Board meeting is on Monday, August 19.
- b. **YMCA Board meeting** – The regular monthly YMCA Board meeting is on Thursday, August 22.
- c. **Peninsula Pulse meeting** – On August 8, Eleanor Corbin, new education reporter for the Pulse, and I met. She is connecting with people as she settles into the new job so I introduced her to some of our staff, gave her a quick tour so she knows where many of our main events take place, etc.
- d. **Match Up Door County Visit** – Kris Ingram from Do good Door County visited our August 13 admin team meeting to talk about the Match Up program they have that looks to match interested senior citizens with part-time employment. I heard Kris present at Noon Rotary this summer and thought it was worth making a connection so if they have anyone looking for a match who might be a match for us it could be a positive thing.

#### **3. Finance, Facilities, & Operations**

- a. **Sturgeon Bay Rec Facility meeting** – The next steering committee meeting is scheduled for August 20 at City Hall. This will be the third meeting of the group. Steering committee members have been assisting the consultants with building a list of stakeholders who could be invited to participate in what they call user group sessions, similar to what we might call a focus group session from things

we've done in the past with operational referenda planning, capital referendum planning, and/or finalizing a community survey.

- b. **School Nursing Updates** – We plan to move forward with DCMC for our LPN and RN nursing services for this school year. We may post for a nursing position again for next year, but would plan to do so earlier in the hiring season.
- c. **Title IX Litigation Update** – As I shared in our meetings in June and July, although the State of Wisconsin is not currently part of any pending litigation based on the information I have read so far, there are some things happening in other states that I want to make you aware of when it comes to the federal Title IX regulations. Neola has been good about sharing informational updates with us.

Based on legal action in June and July, as of July 24 there were rulings impacting 20 states, with challenges still pending in six states. Although there are many pages of legal information anyone can look up on the matter, basically what this means is that school districts in the “enjoined states” continue to operate under the 2020 Title IX regulations.

As I've shared with you previously, I'll plan to keep you updated on developments as I receive those whether through Neola, WASDA, etc.

- d. **Five-Year Self-Evaluation Summary for Pupil Nondiscrimination update** – As I shared last month, we've been working through this process after some interesting communications with DPI. There is an Operations agenda item for this topic this month. The document should be complete and in the August 21 Board meeting packet. It will also be available to the public through our website. I plan take care of the assurance document for DPI prior to the start of the school year.
- e. **M3 Health Insurance Meetings** – M3 staff will be meeting with members of health insurance consortium here in Sturgeon Bay on the morning of Monday, August 19.

4. **Additional Items and/or Updates** *(added after I submitted my report for the Board packet)*



Book	Policy Manual
Section	Special Update - Title IX - June 2024
Title	Copy of New Policy - Special Update - Title IX - June 2024 - NONDISCRIMINATION ON THE BASIS OF SEX IN EDUCATION PROGRAMS OR ACTIVITIES
Code	po2264
Status	Second Reading
Adopted	August 21, 2024

### **New Policy - Special Update - Title IX**

#### **2264 - NONDISCRIMINATION ON THE BASIS OF SEX IN EDUCATION PROGRAMS OR ACTIVITIES**

This policy pertains to sex discrimination, including sex-based harassment, which occurs on or after August 1, 2024. Allegations of sex-based harassment that occur on or before July 31, 2024, shall be addressed pursuant to Policy 2266 ↔ ~~and AG 2266~~ **[END OF OPTION]**. Throughout this policy, unless expressly stated otherwise, reference to "Title IX" includes and incorporates the 2024 Title IX regulations (also known as the "2024 Final Rule"). The Title IX regulations are found at 34 C.F.R. Part 106. References solely to Title IX (20 U.S.C. §§ 1681 – 1688) are denoted as "Title IX (Statute)." In this policy, unless the context otherwise requires, words importing the singular include the plural and vice versa.

For purposes of this policy, both Policy 2264 - Nondiscrimination on the Basis of Sex in Education Programs or Activities and Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities are frequently referenced herein and shall only be referred to by the policy number. As identified in Policy 2266, that policy shall be used for allegations of sex discrimination, including Sexual Harassment, that is based on conduct alleged to have occurred prior to August 1, 2024.

**[DRAFTING NOTE: The 2024 Final Rule serves to "clarify the scope and application of Title IX and the obligations of recipients of Federal financial assistance from the United States Department of Education ["ED"]...to provide an educational environment free from discrimination on the basis of sex, including through responding to incidents of sex discrimination." The 2024 Final Rule stresses – in its Supplementary Information section (i.e., "Preamble") – that ED is responsible for "fully [enforcing] Title IX's nondiscrimination mandate."**

**The 2024 Title IX regulations are effective August 1, 2024. As such, they apply *only* to sex discrimination that allegedly occurred on or after August 1, 2024. With respect to sex discrimination that allegedly occurred prior to August 1, 2024, regardless of when the alleged sex discrimination was reported, ED has stated that it will "evaluate a recipient's compliance against the Title IX statute and the Title IX regulations in place at the time that the alleged sex discrimination occurred." The 2020 Title IX regulations (effective 8/14/2020) focus on effectuating Title IX's prohibition against sex discrimination by requiring recipients to address sexual harassment as a form of sex discrimination in education programs or activities. The 2020 Title IX regulations obligate recipients to respond promptly and supportively to persons alleged to be victimized by sexual harassment, resolve allegations of sexual harassment promptly and accurately under a predictable, fair grievance process that provides due process protections to alleged victims and alleged perpetrators of sexual harassment, and effectively implement remedies for victims. The 2020 Title IX regulations do not provide procedures for addressing claims of sex discrimination in a recipient's education program or activity that are unrelated to sexual harassment. As such, ED states in the Preamble to the 2024 Title IX regulations that "some reports regarding sex discrimination occurring in a recipient's education program or activity may be handled under [the 2024 Title IX regulations] while others will be addressed under the requirements of the [2020 Title IX regulations]." (emphasis added) Presumably, the "will" relates to reports of sexual harassment (or "sex-based harassment" as defined in the 2024 Title IX regulations) that allegedly occurred prior to 8/1/2024, and the "may" refers to reports of alleged sex discrimination that occurred prior to 8/1/2024 that involve non-sexual harassment related violations of Title IX (Statute).**

**Since a recipient is not required to use the grievance procedures outlined in the 2024 Title IX regulations (and this policy) to investigate, address, and remedy alleged violations of Title IX – not involving sex-based harassment - that occurred before 8/1/2024 in the school district's education programs or activities (again,**

allegations of sexual harassment that involve conduct that occurred before 8/1/2024 must be addressed pursuant to the grievance procedures delineated in Policy 2266 and AG 2266), the Title IX Coordinator is afforded broad discretion to determine how best to address in a prompt, effective and equitable manner such Title IX violations.

The language quoted in this DRAFTING NOTE is found at 89 Fed. Reg. 33,841 (Apr. 29, 2024).

For more information concerning the use of this policy and the grievance procedures set forth herein, as opposed to Policy 2266 and the grievance procedures contained in it, refer to the first few paragraphs of the Grievance Procedures section located below.

Neola recommends the Board consult with its Legal Counsel relating to any questions it may have concerning application and implementation of this policy and its corresponding administrative guideline, as compared to Policy 2266 and AG 2266.]

## **NONDISCRIMINATION**

### **Overview:**

The Board of the \_\_Sturgeon Bay\_\_\_\_ School District (hereinafter referred to as “the Board” or “the District”) does not discriminate on the basis of sex and prohibits sex discrimination in any education program or activity that it operates, as required by Title IX, including in admission and employment.

[DRAFTING NOTE: For purposes of the 2024 Title IX regulations, the term “admission” refers to admission to postsecondary institutions (i.e., institutions of graduate higher education, institutions of undergraduate higher education, institutions of professional education, and institutions of vocational education). If a K-12 school does not operate a vocational program (e.g., a school or institution that has as its primary purpose preparation of students to pursue a technical, skilled, or semiskilled occupation or trade, or to pursue study in a technical field, whether or not the school or institution offers certificates, diplomas, or degrees and whether or not it offers fulltime study), the K-12 school does not have to include “admission and” in the preceding sentence (and where that phrase is used throughout this policy); Neola, however, recommends that boards include it because all K-12 schools “enroll” students and often the term “enroll” is viewed as synonymous with the term “admit.” Further, K-12 schools cannot discriminate when enrolling students into the education programs or activities that they operate, so it seems reasonable to include the term “admission.” Additionally, many districts operate adult-based vocational programs and/or have students dual-enrolled in post-secondary institutions – e.g., through Wisconsin’s Early College Credit Program, Start College Now Program, and/or youth apprenticeship programs, so it makes sense to include “admission” even though those postsecondary institutions will have their own Title IX nondiscrimination policies and grievance procedures. If a student enrolled in/admitted to one of these programs notifies the District that the student was allegedly subjected to sex discrimination during/through the student’s participation in the program, the Title IX Coordinator should consult with the Board’s Legal Counsel regarding the District’s responsibility to implement the District’s grievance procedures to address the allegations of sex discrimination and provide supportive measures. The Title IX Coordinator should also contact and coordinate with the postsecondary institution’s Title IX Coordinator concerning the matter.]

Discrimination on the basis of sex includes discrimination on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.

### **[DRAFTING NOTE:**

Unlike a couple of years ago when several States challenged in court a legal guidance document that ED released interpreting the U.S. Supreme Court’s Bostock decision (Bostock v. Clayton County, 590 U.S. (2020), as applying to Title IX and therefore protecting individuals from discrimination based on their sexual orientation or gender identity, the 2024 Title IX regulations “carry the force and effect of law” as a result of ED going through the notice and comment rulemaking process prior to promulgating them.

While the pending lawsuits each seek to void, cancel, or otherwise block ED from implementing the 2024 Final Rule, they each present slightly different bases for challenging the 2024 Title IX regulations. All of them, however, express an underlying or primary concern related to an alleged expansion of the term “sex” to include sexual orientation and gender identity. While these plaintiffs, to date, contend the 2020 Bostock decision – which involved Title VII – does not apply to Title IX, Neola has interpreted “sex” to include “sexual orientation and gender identity” for a number of years pre-dating Bostock based on applicable Sixth Circuit case law (see Dodd v. U.S. Dept. of Education, 845 F.3d 217 (6th Cir. 2016) (holding that discrimination against transgender students likely constitutes sex discrimination under Title IX of the Education Amendments

**Act of 1972 and the Equal Protection Clause of the U.S. Constitution); since that time, even more Circuit courts have upheld such an interpretation (e.g., Whitaker v. Kenosha Unified School District, 858 F.3d 1034 (7th Cir. 2017) (holding that discrimination against transgender students constitutes sex discrimination under Title IX of the Education Amendments Act of 1972 and the Equal Protection Clause of the U.S. Constitution). In fact, original Policy 2266, which Neola developed in 2020 following ED releasing the 2020 Title IX regulations, expressly provides that “sex” includes “sexual orientation and gender identity”).**

**Other concerns raised in the lawsuits primarily deal with aspects of the rules that have a more significant role in the postsecondary setting as opposed to the K-12 education environment; namely, the use of a single investigator/decision-maker model, and a purported reduction in the due process rights afforded to the accused (i.e., whether the respondent is entitled to a live hearing and the ability to cross-examine parties and witnesses prior to a decision-maker rendering a determination of responsibility – which is something that is an option for K-12 schools under the 2020 Title IX regulations but was rarely selected.)**

The Board is committed to maintaining an education and work environment that is free from sex discrimination (including sex-based harassment), responding promptly and effectively when it has knowledge of conduct that reasonably may constitute sex discrimination, and addressing sex discrimination in its education program or activity. Persons who commit sex-based harassment are subject to the full range of disciplinary sanctions set forth in this policy. The Board will provide persons who have experienced sex-based harassment ongoing remedies as reasonably necessary to restore or preserve access to the District’s education program or activity.

## **KEY DEFINITIONS**

Words used in this policy shall have those meanings specified herein; words not defined herein shall be construed according to their plain and ordinary meanings.

**Complainant** means:

- A. a student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX; or
- B. 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 and who was participating or attempting to participate in the District’s education program or activity at the time of the alleged sex discrimination.

**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.

## **~~[OPTIONAL LANGUAGE]~~**

**[x ] Confidential employee** means:

- A. a Board employee whose communications are privileged under Federal or State law; or

The employee’s confidential status, for purposes of this policy, is only with respect to information received while the employee is functioning within the scope of their duties to which privilege or confidentiality applies.

- B. a Board employee whom the Board has designated as confidential under this policy for the purpose of providing services to persons related to sex discrimination;

If the employee also has a duty not associated with providing these services, the employee’s confidential status is only with respect to information received about sex discrimination in connection with providing these services.

- C. The Board designates individuals **(x )** assigned to/holding the following positions **( )** with the following job titles **[END OF OPTIONS]** to be confidential employees for purposes of this policy:

- 1. **(x )** school counselor;
- 2. **(x )** social worker;
- 3. **(x )** school psychologist;
- 4. **(x )** school nurse;

5. ( ) \_\_\_\_\_;

6. ( ) \_\_\_\_\_.

**{DRAFTING NOTE:**

- A. ~~Neola does not recommend the Board include this definition or designate “confidential employees” based on:~~
- ~~1. the confusion that may result from designating a confidential employee(s)—in particular, Board-designated confidential employees will have different responsibilities as compared to ALL other Board employees when it comes to the actions they must take if a person notifies them of alleged sex discrimination;~~
  - ~~2. they require additional training concerning the responsibilities mentioned in the preceding paragraph, which are different from the responsibilities required of ALL other Board employees; and~~
  - ~~3. students or persons who are acting on their behalf may “lose” the “confidentiality” they are seeking if they communicate their concerns about alleged sex discrimination to a person who is not actually a confidential employee—it is safer for students, and those acting on their behalf, to operate on the assumption that if they tell a Board employee about alleged sex discrimination that the Board employee will report it to the Title IX Coordinator.~~
- B. ~~Unlike the postsecondary environment, there is little anticipated benefit in an elementary/secondary school setting to designating confidential employees. A person acting on behalf of a student could contact the Title IX Coordinator to obtain clarification about the Title IX grievance procedures, informal resolution process, and other options available to their child (e.g., supportive measures) without releasing any information or specifically reporting alleged sex discrimination, so there is not much gained by having the person instead speak with a confidential employee who would tell them essentially the same things.~~
- C. ~~Before the Board designates a confidential employee(s), it should consult with its Legal Counsel.~~
- D. ~~If the Board decides to designate one (1) or more confidential employees, Neola suggests that it does so by Position, Title, or Office, and not the person’s name, for the reasons discussed below with respect to why it is preferable to only list the Job Title of the Title IX Coordinator in the policy, as opposed to both the Name and Title—i.e., so the Board does not have to act to amend the policy each time a different person is employed in the designated position.]~~

**{END OPTIONAL LANGUAGE}**

**Day(s):** Unless expressly stated otherwise, the term “day” or “days” as used in this policy means business day(s) (i.e., a day(s) that the Board office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

**Disciplinary sanctions** means: consequences imposed on a respondent following a determination under Title IX that the respondent violated the Board’s prohibition on sex discrimination.

**Education program or activity** refers to: all the District’s operations including, but not limited to, in-person and online/remote educational instruction, employment, extra-curricular activities, athletics, performances, and community engagement and outreach programs. The term applies to all activity that occurs on school grounds or on other property owned or occupied by the Board. It also includes events and circumstances that take place off school property/grounds but over which the District asserts disciplinary authority.

**Eligible Student** means: a student who has reached eighteen (18) years of age or is attending an institution of postsecondary education. ~~{DRAFTING NOTE: This definition is derived from, and consistent with, the corresponding definition from the Family Educational Rights and Privacy Act, 20 U.S.C. 1232g (see 20 U.S.C. 1232g(a)(4) and (d)) and its implementing regulations (see 34 C.F.R. § 99.3).}~~

**Exculpatory evidence** means: evidence that is favorable to a respondent because it helps excuse, justify, or absolve a respondent of alleged wrongdoing and tends to establish a respondent did not engage in sex discrimination.

**Inculpatory evidence** means: evidence that links a respondent to alleged wrongdoing and tends to establish a respondent engaged in sex discrimination (i.e., has culpability).

**Parental status** means: the status of a person who, with respect to another person who is under the age of eighteen (18) or who is eighteen (18) or older but is incapable of self care because of a physical or mental disability, is:

- A. a biological parent;
- B. an adoptive parent;
- C. a foster parent;
- D. a stepparent;
- E. a legal custodian or guardian;
- F. in loco parentis with respect to such a person; or
- G. actively seeking legal custody, guardianship, visitation, or adoption of such a person.

**Party** means: a complainant or respondent.

**Peer retaliation** means: retaliation by a student against another student.

**Pregnancy or related conditions** means:

- A. pregnancy, childbirth, termination of pregnancy, or lactation;
- B. medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; or
- C. recovery from pregnancy, childbirth, termination of pregnancy, lactation, or related medical conditions.

**Relevant** means: related to the allegations of sex discrimination under investigation as part of the Board's 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 decision maker in determining whether the alleged sex discrimination occurred.

**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.

**Respondent** means: a person who is alleged to have violated the Board's prohibition on sex discrimination.

**Retaliation** means: intimidation, threats, coercion, or discrimination against any person by the District, a student, a Board employee, or any other person authorized by the Board to provide aid, benefit, or service under the District's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX, or because the person has reported information, made a complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under the 2024 Title IX regulations.

**Sex-based harassment** prohibited under this policy and the 2024 Title IX regulations is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex – including on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity – that is:

- A. Quid pro quo harassment. An employee, agent, or other person authorized by the Board 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.

**OR**

- B. 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.

**OR**

C. Specific offenses.

1. 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.
2. Dating violence meaning violence committed by a person:
  - a. who is or has been in a social relationship of a romantic or intimate nature with the victim; and
  - b. where the existence of such a relationship shall be determined based on a consideration of the following factors:
    1. the length of the relationship;
    2. the type of relationship; and
    3. the frequency of interaction between the persons involved in the relationship.
3. Domestic violence meaning felony or misdemeanor crimes committed by a person who:
  - a. is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction in which the District is located, or a person similarly situated to a spouse of the victim;
  - b. is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
  - c. shares a child in common with the victim; or
  - d. commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the applicable jurisdiction.
4. Stalking meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
  - a. fear for the person's safety or the safety of others; or
  - b. suffer substantial emotional distress.

~~**Student** means: a person eligible to enroll in, attend, or participate in an elementary (including preschool) or secondary school in the District and who is enrolled in, attending, or participating in, or is seeking/attempting to enroll in, attend, or participate, in the District's education program or activity.~~

**Student with a disability** means: a student who is an individual with a disability as defined under Section 504 of the Rehabilitation Act of 1973, as amended ("Section 504"), or a child with a disability as defined under the Individuals with Disabilities Education Improvement Act ("IDEA").

**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:

- A. 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
- B. provide support during the Board's grievance procedures or an informal resolution process.

### **Parental, Family, or Marital Status**

The Board will not adopt or apply any policy, practice, or procedure concerning a student's current, potential, or past parental, family, or marital status that treats such student differently on the basis of sex.

### **Pregnancy or Related Conditions**

#### **Students:**

The Board prohibits discrimination in its education program or activity against any student based on the student's current, potential, or past pregnancy or related conditions. ~~(→) The Board will permit a student, based on pregnancy or related conditions, to voluntarily participate in a separate portion of the District's education program or activity provided the separate portion is comparable to that offered to students who are not pregnant and do not have related conditions.~~ **[END OF OPTION]** A student who is pregnant or experiencing related conditions shall receive comparable treatment to those with temporary medical conditions. ~~(→) In other words, to the extent not otherwise addressed above, the Board will treat pregnancy or related conditions in the same manner and under the same policies as any other medical condition with respect to any medical or hospital benefit, service, plan, or policy the Board administers, operates, offers, or participates in with respect to students admitted to the District's education program or activity.~~ **[END OF OPTION] [DRAFTING NOTE: This last sentence is consistent with the content of the 2024 Title IX regulations, however, on its face, it appears to be more applicable to postsecondary institutions as compared to K-12 schools; hence, Neola suggests the Board determine for itself whether to include it in this policy.]**

The District will not require a student who is pregnant or has related conditions to provide certification from a healthcare provider or any other person that the student is physically able to participate in the District's class, program, or extra-curricular activity unless:

- A. the certified level of physical ability or health is necessary for participation in the class, program, or extra-curricular activity;
- B. the District requires such certification of all students participating in the class, program, or extra-curricular activity; and
- C. the information obtained is not used as a basis for discrimination prohibited by Title IX or this Policy.

### **District's Responsibilities with Respect to a Student's Pregnancy or Related Conditions**

When a Board employee is informed of a student's pregnancy or related conditions by the student or a person who has a legal right to act on behalf of the student, the employee shall promptly provide that person with the Title IX Coordinator's contact information and inform that person that the Title IX Coordinator can coordinate specific actions to prevent sex discrimination and ensure the student's equal access to the District's education program or activity, unless the employee reasonably believes the Title IX Coordinator has already been notified.

Once a student, or a person who has a legal right to act on behalf of the student, notifies the Title IX Coordinator of the student's pregnancy or related conditions, the Title IX Coordinator shall promptly take the following specific actions to effectively prevent sex discrimination and ensure equal access to the District's education program or activity:

- A. Inform the student and, if applicable, the person who notified the Title IX Coordinator of the District's obligations to:
  - 1. prohibit sex discrimination under this policy, including sex-based harassment;
  - 2. provide the student with the option of reasonable modifications to the Board's policies, practices, or procedures because of pregnancy or related conditions;
  - 3. allow access, on a voluntary basis, to any separate and comparable portion of the District's education program or activity;

4. allow a voluntary leave of absence;
  5. provide lactation space; and
  6. maintain grievance procedures that provide for the prompt and equitable resolution of complaints of sex discrimination, including sex-based harassment.
- B. Provide the student with voluntary reasonable modifications to the Board's policies, practices, or procedures because of pregnancy or related conditions.
  - C. Allow the student to take a voluntary leave of absence from the District's education program or activity to cover, at minimum, the period of time deemed medically necessary by the student's licensed healthcare provider. To the extent that a Board maintains a leave policy for students that allows a greater period of time than the medically necessary period, the Board shall permit the student to take leave under that policy instead if the student so chooses. When the student returns to the District's education program or activity, the student will be reinstated to the academic status and, as practicable, to the extra-curricular status that the student held when the leave began.
  - D. Provide lactation space, which must be a space other than a bathroom, that is clean, shielded from view, free from intrusion from others, and may be used by a student for expressing breast milk or breastfeeding as needed.

See Policy 5751 – School-Age Parents and Married Status of Students (–) and ~~AC 5751 – Education Services for School Age Parents~~ [END OF OPTION].

#### **Employees:**

The Board will not adopt or implement any policy, practice, or procedure, or take any employment action, on the basis of sex:

- A. concerning the current, potential, or past parental, family, or marital status of an employee or applicant for employment, which treats persons differently; or
- B. that is based upon whether an employee or applicant for employment is the head of household or principal wage earner in such employee's or applicant's family unit.

The Board also will not make a pre-employment inquiry as to the marital status of an applicant for employment, including whether such applicant is a "Miss or Mrs."

Similarly, the Board will treat pregnancy or related conditions as any other temporary medical conditions for all job-related purposes, including commencement, duration, and extensions of leave; payment of disability income; accrual of seniority and any other benefit or service; and reinstatement; and under any fringe benefit offered to employees by virtue of employment.

If an employee has insufficient leave or accrued employment time to qualify for leave under the Board's leave policy, the Board will treat pregnancy or related conditions as a justification for a voluntary leave of absence without pay for a reasonable period of time, at the conclusion of which the employee shall be reinstated to the status held when the leave began or to a comparable position, without decrease in rate of compensation or loss of promotional opportunities, or any other right or privilege of employment.

The Board will provide reasonable break time for an employee to express breast milk or breastfeed as needed and will provide the employee with access to a lactation space, which must be a space other than a bathroom that is clean, shielded from view, free from intrusion from others, and may be used by an employee for expressing breast milk or breastfeeding as needed. See Board Policy 6700 – Fair Labor Standards Act.

#### **TITLE IX COORDINATOR(S)**

##### **[DRAFTING NOTES:**

- A. Neola suggests the Board appoint both a male and a female Title IX Coordinator; however, if the Board appoints more than one (1) Title IX Coordinator, it must designate one (1) of the Title IX Coordinators to retain ultimate oversight over the assigned responsibilities and ensure the Board's consistent compliance with its responsibilities under Title IX. Alternatively, the Board could appoint a Title IX Coordinator and one (1) or more persons to assist the Title IX Coordinator with performance of the responsibilities identified in this policy and the 2024 Title IX regulations. Often the persons designated



to assist a Title IX Coordinator are called: Deputy or Assistant Title IX Coordinator, or Title IX Administrator, or Title IX Compliance Officer. If the Board elects this alternative approach, it would only designate a Title IX Coordinator for purposes of this policy, but it would designate the other positions through its AG. The persons in the alternative support roles will need to be trained in the same manner as the Title IX Coordinator (see AG 2264).

- B. The Board must list either the Name(s) or Title(s) of the Title IX Coordinator(s); while the Board may list both the Name(s) and Title(s), Neola suggests that the Board only list the Title(s) in this policy (so the Board does not need to revise/amend the policy whenever there is a change in the actual person(s) holding the designated position(s)), but list both the Name(s) and Title(s) in the requisite notices/postings (e.g., website) and publications (e.g., handbooks). The District will also need to decide whether to list the Name(s) and Title(s), or just the Title(s), in Administrative Guideline 2264 if the District elects to identify the Title IX Coordinator in the AG (see DRAFTING NOTE in the AG; again, if the District lists the Name(s) and Title(s), it will need to remember to update the AG whenever there is a change in the actual person(s) holding the designated position(s). No matter what, the Board will need to amend its policy and update its AG, requisite notices/postings, and publications, whenever it changes the Title of the position(s) designated to serve as the Title IX Coordinator(s).
- C. Reminder: Whenever a new person begins to serve as the Title IX Coordinator (or in a support role to the Title IX Coordinator), the District needs to make sure the new person is appropriately trained, in a timely manner, to fulfill the responsibilities of the Title IX Coordinator position as specified the 2024 Title IX regulations and AG 2264.]

The Board designates and authorizes the following individual(s) to coordinate its efforts to comply with the Board's responsibilities under Title IX:

Lindsay Ferry, Special Education Director/Pupil Services \_\_\_\_\_  
(Name and/or School District Title)

1230 Michigan Street, Sturgeon Bay, WI 54235 \_\_\_\_\_  
(Office Address)

lferry@sbsdmail.net \_\_\_\_\_  
(Email Address)

920-746-2804 \_\_\_\_\_  
(Telephone Number)

**[DRAFTING NOTE: The District may want to create a static (i.e., fixed) Title IX Coordinator-specific email address and phone number that will not change when the person(s) and/or position(s) designated to be the Title IX Coordinator(s) change(s) – e.g., [tixcoordinator@\(insert District's domain\)](mailto:tixcoordinator@(insert District's domain)) – which the Technology Director/Department can program to be forwarded to the actual individual(s) serving as the Title IX Coordinator(s) at any given time. Likewise, the District may want to establish a static Telephone Number for the position of Title IX Coordinator that can be forwarded to, and accessed by, the actual person(s) serving in the Title IX Coordinator position(s) at any given time. These two (2) steps will help reduce the information that needs to be updated in policy, AG, and/or the requisite notices/postings and publications when changes occur to the specific person(s)/position(s) designated to serve as the Title IX Coordinator(s).]**

**[DRAFTING NOTE: Complete the following information if the Board appoints more than one (1) Title IX Coordinator.]**

**[ ] [DESIGNATION OF A SECOND TITLE IX COORDINATOR]**

\_\_\_\_\_  
(Name and/or School District Title)

\_\_\_\_\_  
(Office Address)

\_\_\_\_\_  
(Email Address)

\_\_\_\_\_  
(Telephone Number)

**{END OF OPTION}**

**{DRAFTING NOTE: Select the following option if the Board designates more than one (1) Title IX Coordinator.}**

**[ ]** The Board designates \_\_\_\_\_ **{DRAFTING NOTE: Insert Name and/or Title of the Title IX Coordinator who is ultimately responsible for the District's compliance with its responsibilities under Title IX}** as the coordinator who is ultimately responsible for oversight over the Board's compliance with its responsibilities under Title IX. **{END OF OPTION}**

**[x ]** The Title IX Coordinator may delegate specific duties to one (1) or more designees. **{END OF OPTION}**

**{DRAFTING NOTE: The Board may want to select the following option when the District Administrator is not the District's Title IX Coordinator. While Neola recognizes that this may not always be possible, it may be preferable to have the Title IX Coordinator be someone other than the District Administrator because then – if the Title IX Coordinator serves as the investigator and decision-maker – the District Administrator can serve as the appeal decision-maker or the facilitator for the informal resolution process.}**

**[ x]** The Title IX Coordinator shall report directly to the District Administrator except when the District Administrator is a party to a complaint (i.e., either the complainant or the respondent). Under such circumstances, the Title IX Coordinator shall report directly to **{SELECT ONE OF THE FOLLOWING}** **( )** the Board President **(x )** the Board's Legal Counsel **( )** \_\_\_\_\_ **{OTHER}** **{END OF OPTIONS}** until the matter in which the District Administrator is a party is concluded. **{END OF OPTION}**

Questions about this policy and Policy 2266 ~~( )~~ and AG 2264 and AG 2266 **{END OF OPTION}** should be directed to the Title IX Coordinator.

The Title IX Coordinator shall monitor the District's education programs and activities for barriers to reporting information about conduct that reasonably may constitute sex discrimination under Title IX, and take steps reasonably calculated to address such barriers.

**[ ]** The Title IX Coordinator is responsible for notifying all participants in the District's education program or activity of how to contact its confidential employees. **{END OF OPTION}**

**{DRAFTING NOTE:**

- A. **For the reasons discussed in the DRAFTING NOTE that accompanies the Definition of "confidential employee," Neola does not recommend the Board designate confidential employee(s), especially for their K-12 programs.**
- B. **If, however, the Board designates one or more confidential employees, it needs to select this OPTION.**
- C. **The District has flexibility and discretion to decide what information to provide (e.g., whether to identify a confidential employee by Name, Title, Office, or Telephone Number (this presumably would be a static number that would auto-forward to the actual person serving as a confidential employee)). The District just needs to provide sufficient information for participants to be able to contact the confidential employee(s).]**

## **Notice of Nondiscrimination**

The District Administrator shall provide a notice of nondiscrimination to students, parents, guardians, or other authorized legal representatives of elementary and secondary students; employees; and applicants for admission and employment; and all unions and professional organizations holding collective bargaining or professional agreements with the Board. Specifically, the District Administrator shall post the notice of discrimination on the District's website and in each handbook, catalog, announcement, bulletin, and application form that it makes available to the persons listed above, or which are otherwise used in connection with the recruitment of students or employees. ~~( ) See AG 2264 and Form 2264F1 – Notice and Statement of Nondiscrimination.~~ **{END OF OPTION}**

## **GRIEVANCE PROCEDURES**

### **Overview:**

The Board adopts the following grievance procedures to provide for the prompt and equitable resolution of complaints made by students, employees, or other individuals who are participating or attempting to participate in the District's education program or activity, or by the Title IX Coordinator, alleging any action that would be prohibited by Title IX.

These grievance procedures shall be used for all complaints of sex discrimination, including sex-based harassment, involving conduct alleged to have occurred on or after August 1, 2024. These grievance procedures also may be used, at the discretion of the Title IX Coordinator, to investigate, address, and remedy (as necessary) conduct alleged to have occurred before August 1, 2024, that does not involve sex-based harassment, but some other form of sex discrimination prohibited by Title IX (Statute) – e.g., claims of unequal athletic opportunities, admissions discrimination, discrimination in courses or academic programs (i.e., excluding students from certain classes or programs based on their sex), pregnancy discrimination, unequal treatment based on parental, family, or marital status, discrimination in employment (including in hiring, promotion, and compensation), and retaliation. If the Title IX Coordinator elects not to use these grievances procedures to investigate and resolve such claims, the Title IX Coordinator will still need to implement some procedures to assess – in a prompt, effective, and equitable manner – whether Title IX (Statute) was violated, and, if it was, how best to end the sex discrimination in the District's education program or activity, prevent its recurrence, and remedy its effects.

**[DRAFTING NOTE: Title VII of the Civil Rights Act of 1964 ("Title VII") and Title IX are both Federal laws that prohibit discrimination in employment, but they differ in their focus. Title VII prohibits employment discrimination based on race, color, religion, sex, or national origin, and applies to employers with fifteen (15) or more employees. Title IX, on the other hand, specifically prohibits discrimination on the basis of sex in education programs and activities that receive Federal financial assistance, including employment within those institutions. While both laws aim to prevent sex-based discrimination in the workplace, Title VII applies more broadly to various types of employers, whereas Title IX is limited to educational institutions receiving Federal funds. Ultimately, both laws aim to ensure equal employment opportunities and protect individuals from discrimination. When a Title IX Coordinator receives a complaint or notification of alleged misconduct, involving sex discrimination (in particular, sex-based harassment) that involves an employee complainant and an employee respondent, the Title IX Coordinator may want to consult with the Board's Legal Counsel concerning which law – it may be both – the District will need to comply with when investigating the allegations.]**

Reports and Formal Complaints of "Sexual Harassment" (as defined in Policy 2266) involving conduct alleged to have occurred prior to August 1, 2024, are subject to the grievance procedures outlined in Policy 2266.

Under all circumstances, the Title IX Coordinator shall offer and coordinate supportive measures, as appropriate, in accordance with this policy ~~(→) and AG-2264~~ **[END OF OPTION]**, or Policy 2266 ~~(→) and AG-2266~~ **[END OF OPTION]**, if the Report or Formal Complaint involves "Sexual Harassment" alleged to have occurred prior to August 1, 2024.

If the conduct giving rise to a report or complaint of sex discrimination is alleged to have occurred both before **and** after August 1, 2024 (i.e., is part of a pattern of sex discrimination), the Title IX Coordinator shall determine **( )**, after consulting with the Board's Legal Counsel, **[END OF OPTION]** whether to use the grievance procedures contained in this policy or the grievance procedures contained in Policy 2266. The Title IX Coordinator will notify, in writing, the parties of the determination and the rationale for it. Under no circumstances, however, will a party be denied the due process to which the party is entitled based on the U.S. Department of Education-issued regulations in effect at the time the conduct alleged to violate Title IX (Statute) took place. **(x ) Nothing herein shall prevent the Title IX Coordinator from using a hybrid grievance procedure that contains aspects of the grievance procedures contained in both this policy and Policy 2266, so that the parties receive all of the due process to which they are entitled. [END OF OPTION]**

### **Complaints:**

The following people may make a complaint of sex discrimination – i.e., request that the District investigate and make a determination about whether sex discrimination as prohibited under Title IX occurred:

A. a "complainant," which includes:

1. a student or employee of the District who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX; or
2. a person other than a student or employee of the District who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX at a time when that individual was participating or attempting to participate in the District's education program or activity;

B. a parent, guardian, or other authorized legal representative with the legal right to act on behalf of a complainant;

C. the District's Title IX Coordinator.

A person is entitled to make a complaint of sex-based harassment only if they themselves are alleged to have been subjected to the sex-based harassment, if they have a legal right to act on behalf of such person who was subjected to the sex-based harassment, or if the Title IX Coordinator initiates a complaint consistent with the requirements of the 2024 Title IX regulations ~~( )~~, which are detailed in AC 2264 **[END OF OPTION]**.

**[DRAFTING NOTE: This paragraph emphasizes that in order for a person to file a complaint of sex-based harassment, the person has to have been subjected to the alleged misconduct directly, or be a person who has a legal right to act on behalf of the person who was subjected to the alleged misconduct. This is consistent with the prior paragraph where the complainant is identified as a student or employee who was "subjected to conduct that could constitute sex discrimination under Title IX." The following paragraph, on the other hand, expands who can file a complaint – when the alleged sex discrimination does not involve sex-based harassment – to persons who are aware of the alleged sex discrimination, even if that person was not directly affected by or subject to the alleged sex discrimination.]**

With respect to complaints of sex discrimination other than sex-based harassment, in addition to the people listed above, the following persons have a right to make a complaint:

- A. any student or employee of the District; or
- B. any person other than a student or employee who was participating or attempting to participate in the District's education program or activity at the time of the alleged sex discrimination.

The District may consolidate complaints of sex discrimination against more than one (1) respondent, or by more than one (1) complainant against one (1) or more respondents, or by one (1) party against another party, when the allegations of sex discrimination arise out of the same facts or circumstances. When more than one (1) complainant or more than one (1) respondent is involved, references below to a party, complainant, or respondent include the plural, as applicable.

#### **Basic Requirements:**

The District will treat complainants and respondents equitably.

All persons involved with implementing the grievance procedures and any other aspects of Policy 2264, including the Title IX Coordinator, the investigator, the decision-maker, and the appeal decision-maker, **( x )** and the facilitator of the informal resolution process, **[END OF OPTION]** shall be free from any conflicts of interest or bias for or against complainants or respondents generally or an individual complainant or respondent.

**[ x ]** The Title IX Coordinator may serve simultaneously as an investigator and/or a decision-maker. **[END OF OPTION]**  
**[DRAFTING NOTE: Neola recommends the Board select this OPTION; note it is "may" (i.e., optional) so the Title IX Coordinator can decide when to serve in both roles and when to designate one or more persons to perform those responsibilities in a given case.]**

If the Title IX Coordinator does not intend to serve as the investigator and decision-maker in a specific case, the Title IX Coordinator shall designate one (1) or more administrators who are appropriately trained to serve in the role. Likewise, the Title IX Coordinator shall appoint an appeal decision-maker when an appeal is filed.

In circumstances when the Title IX Coordinator and trained administrators do not have time/capacity to serve, or are prevented due to a conflict of interest, bias, or partiality, or other reasons that impair the Title IX Coordinator and other trained administrators from serving as an investigator and/or decision-maker in a specific case, the Title IX Coordinator shall **( x )**, in consultation with **( x )** and with the approval of **[END OF OPTION]** the District Administrator or ~~( ) Board~~ **( x )** Board President (as appropriate), **[END OF OPTION]** secure one (1) or more independent third parties to serve as the investigator and/or decision-maker. Similarly, the Title IX Coordinator has authority **( x )**, in consultation with **( x )** and approval of **[END OF OPTION]** the District Administrator or ~~( ) Board~~ **( x )** Board President (as appropriate), **[END OF OPTION]** to secure an independent third party to serve as the appeal decision-maker.

The District presumes that the respondent is not responsible for the alleged sex discrimination until a determination is made at the conclusion of its grievance procedures.

Under ordinary circumstances, the Board expects to complete the major stages of the grievance procedures within the timeframe specified below:

- A. **Evaluation** – The Title IX Coordinator will determine whether to dismiss a complaint or investigate it within \_30 business\_\_\_\_\_ **[INSERT # OF DAYS]** days of receiving the complaint. **[DRAFTING NOTE: Neola recommends that the evaluation stage be completed within ten (10) days of the Title IX Coordinator receiving notice**



of the complaint.]

- B. **Investigation** – The Title IX Coordinator, or designated investigator, shall ordinarily complete the investigation (i.e., collect relevant evidence that is not otherwise impermissible) within  (30)  **[INSERT # OF DAYS]** days of the Title IX Coordinator determining the charges require investigation. If, however, the Title IX Coordinator, or designated investigator, determines that the investigation is going to take longer, the Title IX Coordinator will so notify the parties **( x )** and the District Administrator **[END OF OPTION]** and will thereafter keep the parties **( x )** and the District Administrator **[END OF OPTION]** informed of the status of the matter on a  regular  **[INSERT TIME PERIOD – E.G., BIWEEKLY OR REGULAR]** basis. **[DRAFTING NOTE: Recognizing ED wants investigations to be completed in a prompt and equitable manner, and therefore provided elementary and secondary schools with greater flexibility when it comes to completing an investigation than is afforded to them under the 2020 Title IX regulations, Neola recommends a school district typically complete Investigations within thirty (30) days.]** Once the Title IX Coordinator, or designated investigator, provides the parties with “access” to either the relevant and not otherwise impermissible evidence and/or an accurate description of the evidence, the parties will have  (5)  **[INSERT # OF DAYS]** days to respond to the evidence or the description of the evidence unless the Title IX Coordinator approves a party’s written request for more time. If the Title IX Coordinator approves such a request, both parties will be afforded an equal amount of time to submit their response. **[DRAFTING NOTE: Neola recommends the Board limits the amount of time the parties have to review the evidence/description of the evidence to five (5) days so the matter can proceed in a timely manner to Determination.]**
- C. **Determination** – After the parties either submit responses to the evidence/description of the evidence, or the deadline for submitting such responses expires, the Title IX Coordinator, or designated decision-maker, will consider the relevant and otherwise not impermissible evidence and issue a determination as to whether sex discrimination occurred. The determination shall be issued within  (10)  **[INSERT # OF DAYS]** days of the deadline for the parties to submit responses to the evidence/description of the evidence **( x )** unless the **( )** District Administrator **( x )** Title IX Coordinator **[END OF OPTION]** approves an extension of time, which must be communicated in writing to the parties **[END OF OPTION]**. **[DRAFTING NOTE: Neola recommends the Determination ordinarily be issued within ten (10) days of the date when the parties have to submit their responses to the evidence/description of the evidence. If the decision-maker is someone other than the Title IX Coordinator, upon written request from the decision-maker, the Title IX Coordinator should be permitted to approve a reasonable extension of time for the Determination to be issued. If the Title IX Coordinator is the decision-maker: upon written request from the Title IX Coordinator, the District Administrator should be permitted to approve a reasonable extension of time for the Determination to be issued. In either situation, the administrator granting the extension should communicate to the parties the new deadline along with a rationale for the extension.]**
- D. **Appeal** – A party filing an appeal of the Title IX Coordinator’s decision to dismiss a complaint **( )**, or the **Determination**, **[END OF OPTION]** must do so within  (5)  **[INSERT # OF DAYS]** days of receiving the Dismissal **( )** or **Determination** **[END OF OPTION]**. **DRAFTING NOTE: Neola recommends the Board allow limited appeals based on the Determination. See DRAFTING NOTE below in the appeal section, which further discusses when a board “has” to allow appeals, as opposed to under which circumstances a board could decide not to allow appeals on the Determination.”]**

The Title IX Coordinator, or the District Administrator if the Title IX Coordinator is the individual requesting an extension, may approve reasonable extensions of the preceding timeframes on a case-by-case basis for good cause with notice to the parties.

The District will take reasonable steps to protect the privacy of the parties and witnesses during its grievance procedures. These steps will not restrict the ability of the parties to obtain and present evidence, including by speaking to witnesses; consult with their family members, confidential resources, or advisors; or otherwise prepare for or participate in the grievance procedures. The parties shall not engage in retaliation, including against witnesses.

The Title IX Coordinator, or designated decision-maker, shall objectively evaluate all evidence that is relevant and not otherwise impermissible — including both inculpatory and exculpatory evidence. Credibility determinations shall not be based on a person’s status as a complainant, respondent, or witness.

The following types of evidence, and questions seeking that evidence, are impermissible (i.e., will not be accessed or considered, except by the District to determine whether one of the exceptions listed below applies; will not be disclosed; and will not otherwise be used), regardless of whether they are relevant:

- A. evidence that is protected under a privilege recognized by Federal or State law ~~( )~~ or evidence provided to a confidential employee **[END OF OPTION]**, unless the person to whom the privilege or confidentiality is owed has voluntarily waived the privilege or confidentiality; **[DRAFTING NOTE: The Board should only select the**

**preceding OPTION if it has designated confidential employee(s).]**

- 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; and
- 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 shall not by itself demonstrate or imply the complainant's consent to the alleged sex-based harassment or preclude a determination that sex-based harassment occurred.

**Notice of Allegations:**

Upon initiation of the Board's grievance procedures, the Title IX Coordinator shall notify the parties of the following:

- A. the Board's Title IX grievance procedures **(x ) and informal resolution process [END OF OPTIONS]; [DRAFTING NOTE: Neola encourages the Board to include an informal resolution process.]**
- B. sufficient information available at the time to allow the parties to respond to the allegations, including the identities of the parties involved in the incident(s), the conduct alleged to constitute sex discrimination, and the date(s) and location(s) of the alleged incident(s);
- C. retaliation is prohibited; and
- D. the parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence or an accurate description of this evidence. If the Title IX Coordinator, or designated investigator, provides the parties with a description of the evidence, any party may request access to the relevant and not otherwise impermissible evidence. The Title IX Coordinator will provide the requesting party with the relevant and not otherwise impermissible evidence in a timely manner.

Should the Title IX Coordinator decide, at any point, to investigate allegations that are materially beyond the scope of the initial written notice, the Title IX Coordinator will provide a supplemental written notice describing the additional allegations to be investigated.

**Dismissal of a Complaint:**

The Title IX Coordinator may dismiss a complaint of sex discrimination if:

- A. the District is unable to identify the respondent after taking reasonable steps to do so;
- B. the respondent is not participating in the District's education program or activity and is not employed by the Board;
- C. the complainant voluntarily withdraws any or all the allegations in the complaint, the Title IX Coordinator declines to initiate a complaint, and the District determines that, without the complainant's withdrawn allegations, the conduct that remains alleged in the complaint, if any, would not constitute sex discrimination under Title IX even if proven; or
- D. the District determines the conduct alleged in the complaint, even if proven, would not constitute sex discrimination under Title IX. Before dismissing the complaint, the Title IX Coordinator will make reasonable efforts to clarify the allegations with the complainant.

**[DRAFTING NOTE: While the 2024 Title IX regulations do not require notification of the dismissal to be provided in writing, Neola recommends that the Title IX Coordinator document the dismissal in writing – i.e., Neola recommends the board selects Option 1.]**

**[SELECT OPTION 1 OR OPTION 2]**

**[x ] [OPTION 1]**

Upon dismissal, the Title IX Coordinator will promptly notify, in writing, the complainant of the basis for the dismissal. If the dismissal occurs after the respondent has been notified of the allegations, then the Title IX Coordinator will also simultaneously notify, in writing, the respondent of the dismissal and the basis for the dismissal.

**[END OF OPTION 1]**

**[OR]**

**~~[ ] [OPTION 2]~~**

~~Upon dismissal, the Title IX Coordinator will promptly notify the complainant of the basis for the dismissal. If the dismissal occurs after the respondent has been notified of the allegations, then the Title IX Coordinator will also notify the respondent of the dismissal and the basis for the dismissal promptly following notification to the complainant, or simultaneously if notification is in writing.~~

**~~[END OF OPTION 2]~~**

The Title IX Coordinator will notify the complainant that a dismissal may be appealed and will provide the complainant with an opportunity to appeal the dismissal of a complaint. If the dismissal occurs after the respondent has been notified of the allegations, then the Title IX Coordinator will also notify the respondent that the dismissal may be appealed. Dismissals may be appealed on the following bases:

- A. procedural irregularity that would change the outcome;
- B. new evidence that would change the outcome and that was not reasonably available when the dismissal was made; and
- C. the Title IX Coordinator, investigator, or decision-maker had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that would change the outcome.

If the dismissal is appealed, the Title IX Coordinator will:

- A. notify the parties of any appeal, including notice of the allegations, if notice was not previously provided to the respondent;
- B. implement appeal procedures equally for the parties;
- C. ensure that the appeal decision-maker did not take part in an investigation of the allegations or dismissal of the complaint;
- D. ensure that the appeal decision-maker has been trained consistent with the 2024 Title IX regulations ~~(→ See AG 2264~~ **[END OF OPTION];**
- E. provide the parties a reasonable and equal opportunity to make a statement in support of, or challenging, the outcome; and
- F. notify the parties of the result of the appeal and the rationale for the result.

When a complaint is dismissed, the Title IX Coordinator will, at a minimum:

- A. offer supportive measures to the complainant as appropriate;
- B. if the respondent has been notified of the allegations, offer supportive measures to the respondent as appropriate; and
- C. take other prompt and effective steps, as appropriate, to ensure that sex discrimination does not continue or recur within the District's education program or activity.

**[DRAFTING NOTE: Neola encourages the Board to select the following option so the Title IX Coordinator can choose in appropriate circumstances to offer the parties the opportunity to participate in an informal resolution process, or to honor the parties' request to use an informal resolution process, to end the sex discrimination, prevent its recurrence, and remedy its effects.]**

**[x ] [OPTIONAL LANGUAGE: INFORMAL RESOLUTION PROCESS]**

**Informal Resolution Process:**

In lieu of resolving a complaint through the Board's Title IX grievance procedures, the parties may instead elect to participate in an informal resolution process. The District will not offer informal resolution to resolve a complaint that includes allegations that an employee engaged in sex-based harassment of an elementary school or secondary school student, or when such a process would conflict with Federal, State, or local law.

**[END OF OPTIONAL LANGUAGE: INFORMAL RESOLUTION PROCESS]**

**~~Adding Allegations and/or Consolidating Complaints:~~**

~~If, in the course of an investigation, the District decides to investigate additional allegations of sex discrimination by the respondent toward the complainant that are not included in the original Notice of Allegations provided or that are included in a complaint that is consolidated, the Title IX Coordinator will notify the parties of the additional allegations.~~

**Investigation:**

The District will provide for an adequate, reliable, and impartial investigation of complaints.

The burden is on the District — not on the parties — to conduct an investigation that gathers sufficient evidence to determine whether sex discrimination occurred.

The Title IX Coordinator, or the designated investigator and/or decision-maker, will provide an equal opportunity for the parties to present fact witnesses and other inculpatory and exculpatory evidence that are relevant and not otherwise impermissible.

The Title IX Coordinator, or the designated investigator and/or decision-maker, will review all evidence gathered through the investigation and determine what evidence is relevant and what evidence is impermissible regardless of relevance.

The District will provide each party with an equal opportunity to access the evidence that is relevant to the allegations of sex discrimination and not otherwise impermissible, in the following manner:

- A. the District will provide the parties with an equal opportunity to access either the relevant and not otherwise impermissible evidence, or an accurate description of this evidence;

If the Title IX Coordinator, or designated investigator, provides a description of the evidence, the Title IX Coordinator, or designated investigator, will provide the parties with an equal opportunity to access the relevant and not otherwise impermissible evidence upon the request of any party.

- B. the District will provide a reasonable opportunity to the parties to respond to the evidence or the accurate description of the evidence; and

- C. the District will take reasonable steps to prevent and address the parties' unauthorized disclosure of information and evidence obtained solely through the grievance procedures. Disclosures of such information and evidence for purposes of administrative proceedings or litigation related to the complaint of sex discrimination are authorized.

**Questioning the Parties and Witnesses:**

**[DRAFTING NOTE: If the investigator and decision-maker are two (2) separate persons, the Board may select OPTION 1 or OPTION 2, or refrain from addressing this topic in the policy.]**

**~~[ ] [OPTION 1]~~**

~~As part of the Investigation, the investigator ( ) may ( ) is encouraged to [END OF OPTION] include in the investigator's notes/file the investigator's opinion about each party's or witness's credibility to the extent credibility is both in dispute and relevant to evaluating one (1) or more allegations of sex discrimination.~~

**~~[END OF OPTION 1]~~**

**~~[ ] [OPTION 2]~~**

~~The investigator should refrain from including in the investigator's notes/file the investigator's opinion about each party's or witness's credibility since the assessment of credibility is solely the responsibility of the decision-maker.~~

**~~[END OF OPTION 2]~~**



**~~{END-OF-OPTIONS}~~**

If the investigator and decision-maker are two (2) separate individuals, the decision-maker will have an opportunity to question the parties and witnesses to adequately assess a party's or witness's credibility to the extent credibility is both in dispute and relevant to evaluating one (1) or more allegations of sex discrimination.

If the investigator and the decision-maker are the same person, the decision-maker will have an opportunity to question the parties and witnesses in individual meetings as part of the investigation.

**~~{DRAFTING NOTE: The Board may select either, both, or neither of the following options. The Board should consult with its Legal Counsel to assess whether to offer any of these options.}~~**

**~~{ } Before concluding the Investigation, the investigator ( ) will ( ) may {END-OF-OPTION} allow each party to propose/submit in writing relevant questions that the party wants asked of any party or witness and~~**

**~~{DRAFTING NOTE: SELECT OPTION 1, OPTION 2, OR OPTION 3. Neola does not have an opinion as to whether the Board selects OPTION 1 or OPTION 2 but has reservations about OPTION 3. The Board should consult with its Legal Counsel before selecting OPTION 3.}~~**

**~~( ) {OPTION 1}~~**

~~the investigator will review any questions submitted by the parties and ask those questions of the specific party or witness that the investigator determines — in the investigator's sole discretion — may lead to probative evidence that will assist the decision maker in determining whether sex discrimination occurred. The investigator's decision to ask or not ask a specific question proposed by a party is not subject to review. Any questions asked must be relevant and not otherwise impermissible.~~

**~~{END-OF-OPTION 1}~~**

**~~{OR}~~**

**~~( ) {OPTION 2}~~**

~~the investigator will ask the relevant and not otherwise impermissible questions of the specific party or witness during one (1) or more individual meetings, including follow-up meetings, with the party or witness.~~

**~~{END-OF-OPTION 2}~~**

**~~{OR}~~**

**~~( ) {OPTION 3}~~**

~~the investigator will ask the relevant questions that are not otherwise impermissible, provide each party with the answers, and allow for additional, limited follow-up relevant questions from each party. ( ) The investigator will explain to the party proposing the question(s) any decision to exclude a question as not relevant.~~

**~~{END-OF-OPTION 3}~~**

**~~{END-OF-OPTIONS}~~**

**[ ] After the parties have an opportunity to review the relevant and not otherwise impermissible evidence, or an accurate description of this evidence, the decision-maker ( ) will ( ) may**

**[DRAFTING NOTE: Select OPTION 1, OPTION 2, OPTION 3, OR OPTION 4. While Neola does not have an opinion as to whether the Board selects OPTION 1 or OPTION 2, it does not recommend the Board select OPTION 3 or OPTION 4, without consulting with its Legal Counsel.]**

**( ) [OPTION 1]**

**allow each party to propose/submit in writing relevant questions that the party wants asked of any party or witness and the decision-maker will review any relevant and not otherwise impermissible questions submitted by the parties and ask those questions of the specific party or witness that the decision-maker determines – in the decision-**

maker's sole discretion – may lead to probative evidence that will assist the decision-maker in determining whether sex discrimination occurred. The decision-maker's decision to ask or not ask a specific question proposed by a party is not subject to review. Any questions asked must be relevant and not otherwise impermissible.

**[END OF OPTION 1]**

**[OR]**

**( ) [OPTION 2]**

allow each party to propose/submit in writing relevant questions that the party wants asked of any party or witness and the decision-maker will ask the relevant and not otherwise impermissible questions of the specific party or witness during one (1) or more individual meetings, including follow-up meetings, with the party or witness.

**[END OF OPTION 2]**

**[OR]**

**( ) [OPTION 3]**

allow each party to propose/submit in writing relevant questions that the party wants asked of any party or witness and the decision-maker will ask the relevant questions that are not otherwise impermissible, provide each party with the answers, and allow for additional, limited follow-up relevant questions from each party. ( ) The decision-maker will explain to the party proposing the question(s) any decision to exclude a question as not relevant. **[END OF OPTION]**

**[END OF OPTION 3]**

**[OR]**

**( ) [OPTION 4]**

provide each party with an audio or audiovisual recording or transcript of the investigator's interviews of the parties and witnesses with enough time for the parties to have a reasonable opportunity to propose/submit in writing follow-up questions, and the decision-maker

( ) will review any follow-up questions submitted and ask those relevant and not otherwise impermissible follow-up questions of the specific party or witness that the decision-maker determines – in the decision-maker's sole discretion – may lead to probative evidence that will assist the decision-maker in determining whether sex discrimination occurred. The decision-maker's decision to ask or not ask a specific follow-up question proposed by a party is not subject to review. Any questions asked must be relevant and not otherwise impermissible.

( ) will ask the relevant and not otherwise impermissible follow-up questions of the specific party or witness during one (1) or more individual meetings.

**[END OF OPTION 4]**

**[END OF OPTIONS]**

#### **Determination of Whether Sex Discrimination Occurred:**

Following an investigation and evaluation of all relevant and not otherwise impermissible evidence, the Title IX Coordinator or designated decision-maker will:

- A. Use the preponderance of the evidence standard of proof to determine whether sex discrimination occurred.  
**[DRAFTING NOTE: Pursuant to the 2024 Title IX regulations, the Board may only use the "clear and convincing" evidence standard of proof if it uses that standard of proof in all other comparable proceedings (i.e., when assessing the merits of allegations presented pursuant to complaints filed under the Board's general nondiscrimination and antiharassment policies – see Policy 1422/Policy 3122/Policy 4122 - Nondiscrimination and Equal Employment Opportunity, Policy 1632/Policy 3362/Policy 4362 - Employee Anti-Harassment, Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity, Policy 2260.01 - Section 504/ADA Prohibition Against Discrimination Based on Disability, Policy 5517 - Student Anti-Harassment, Policy 8913 - Section 504/ADA Prohibition Against Disability**

**Discrimination in Employment.) Neola expects it will be a rare situation when a board chooses to use a clear and convincing standard of proof. If the Board is unsure whether it meets the criteria to be able to use the "clear and convincing standard," it should consult with its Legal Counsel.]** This standard of proof requires the decision-maker to evaluate relevant and not otherwise impermissible evidence for its persuasiveness. If the decision-maker, applying the applicable standard, is not persuaded by the relevant and not otherwise impermissible evidence that sex discrimination occurred, regardless of the quantity of the evidence, the decision-maker will not determine that sex discrimination occurred.

- B. Notify the parties, in writing, of the determination whether sex discrimination occurred under Title IX including the rationale for such determination, and the procedures and permissible bases for the complainant and respondent to appeal.
- C. Not impose discipline on a respondent for sex discrimination prohibited by Title IX unless there is a determination at the conclusion of the grievance procedures that the respondent engaged in prohibited sex discrimination.
- D. If there is a determination that sex discrimination occurred, the Title IX Coordinator will, as appropriate:
  - 1. coordinate the provision and implementation of remedies to a complainant and other people the District identifies as having had equal access to the District's education program or activity limited or denied by sex discrimination;
  - 2. coordinate the imposition of any disciplinary sanctions on a respondent, including notification to the complainant of any such disciplinary sanctions; and
  - 3. 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.
- E. Comply with the grievance procedures before the imposition of any disciplinary sanctions against a respondent; and
- F. Not discipline a party, witness, or others participating in the grievance procedures for making a false statement or for engaging in consensual sexual conduct based solely on the determination of whether sex discrimination occurred.

**[DRAFTING NOTE: As addressed above, the Board must offer an appeal if the Title IX Coordinator dismisses a complaint in the Evaluation stage (i.e., prior to commencing an investigation). While a board may elect not to offer an appeal from the determination of whether sex discrimination occurred, Neola recommends the Board include an appeal process. If the Board includes an appeal process, the appeal process must be, at a minimum, the same appeal process the Board offers in all other comparable proceedings, including proceedings relating to other discrimination complaints. Neola intends to update its nondiscrimination, antiharassment, and Section 504/ADA policies to provide for appeal procedures that are comparable to that which is included in the following option.]**

**[ ] [OPTIONAL LANGUAGE]**

#### **Appeal of Determinations:**

**If a party disagrees with the decision maker's determination as to whether sex discrimination occurred, the party may file an appeal. Appeals must be submitted, in writing, within \_\_\_\_\_ (INSERT # OF DAYS) days of the appealing party's receipt of the Determination.**

**A party may appeal a Determination on the following bases:**

- A. **procedural irregularity that would change the outcome;**
- B. **new evidence that would change the outcome and that was not reasonably available when the Determination was made; and**
- C. **the Title IX Coordinator, investigator, or decision maker had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that would change the outcome.**

**[DRAFTING NOTE: The Board may insert additional grounds on which an appeal may be filed.]**

- D. **( ) the recommended remedies (including disciplinary sanctions/consequences) are unreasonable in light of the findings of fact (i.e., the nature and severity of the sex discrimination);**
- E. **( ) [OTHER] \_\_\_\_\_;**

~~[ ] The complainant may not challenge the ultimate disciplinary sanction/consequence that is imposed. [END OF OPTION]~~

~~If a party appeals the decision maker's determination, the Title IX Coordinator will:~~

- ~~A. notify the parties of any appeal;~~
  - ~~B. implement appeal procedures equally for the parties;~~
  - ~~C. designate an appeal decision maker, who will be a person who did not conduct the Investigation or render the Determination, and is appropriately trained ( ), as set forth in AG 2264 [END OF OPTION];~~
- ~~1. ( ) the Title IX Coordinator will designate the District Administrator to be the appeal decision maker, provided the District Administrator has not been otherwise involved in the grievance procedures (i.e., did not serve as the investigator, decision maker, or informal resolution process facilitator) and is appropriately trained; [END OF OPTION];~~
  - ~~2. ( ) in designating an appeal decision maker, the Title IX Coordinator will work with the Board to identify and appoint an independent third party to serve as the appeal decision maker — this individual shall be considered to be the Board's designee and will submit the appeal decision to the Board who will promptly adopt it as written and forward it to the Title IX Coordinator who will send it simultaneously to the parties; [END OF OPTION]~~

~~[DRAFTING NOTE: The preceding options are offered for those districts where the District Administrator or Board typically serves as the appeal decision maker; with respect to Title IX, it is Neola's opinion that it is not feasible for the Board to serve as the decision maker for a number of reasons, not the least of which is the mandatory training requirements.]~~

- ~~3. provide the parties a reasonable and equal opportunity to make a statement in support of, or challenging, the decision maker's determination;~~
- ~~4. provide the appeal decision maker with the relevant and not otherwise impermissible evidence along with the accurate description of the relevant evidence (if one was prepared and shared with the parties), any responses the parties submitted to the investigator related to the evidence and/or the description of the evidence (if one was prepared), and the decision maker's determination; and~~
- ~~5. notify the parties, in writing, of the result of the appeal and the appeal decision maker's rationale for the outcome;~~

~~[END OF OPTIONAL LANGUAGE]~~

**Parties Provided a Reasonable and Equal Opportunity to Make a Statement in Support of, or Challenging, the Determination**

~~[DRAFTING NOTE: The Board must select OPTION 1, OPTION 2, or OPTION 3]~~

~~[ ] [OPTION 1]~~

~~When a party files an appeal, the party must set forth the reason for the appeal, and the other party will have \_\_\_\_\_ [INSERT # OF DAYS] days to provide the appeal decision maker with a statement in support of their position. Once the decision maker receives the statement (or the deadline for filing such a statement expires), the appeal decision maker will have \_\_\_\_\_ [INSERT # OF DAYS] days to issue a decision on the appeal.~~

~~[END OF OPTION 1]~~

~~[OR]~~

~~[ ] [OPTION 2]~~

~~After a party files an appeal, both parties will have \_\_\_\_\_ [INSERT # OF DAYS] days to submit to the appeal decision maker a statement in support of their position that they want the appeal decision maker to consider in rendering a decision. Once the decision maker receives each parties' statement, or the timeline for submitting such statements expires, the appeal decision maker will have \_\_\_\_\_ [INSERT # OF DAYS] days to issue a decision on the appeal.~~

~~[END OF OPTION 2]~~

~~[OR]~~

~~[ ] [OPTION 3]~~

~~When a party files an appeal, the appeal decision maker shall establish a timeline for each party to submit a statement in support of their position that they want the appeal decision maker to consider in rendering a decision. Once the decision maker receives the parties' statements, or the timeline established by the appeal decision maker for submitting such statements expires, the appeal decision maker will have \_\_\_\_\_ [INSERT # OF DAYS] days to issue a decision on the appeal.~~

~~[END OF OPTION 3]~~

~~[END OF OPTIONS]~~

**[DRAFTING NOTE: With respect to the timelines listed in the preceding options, Neola suggests any appeals should be filed within five (5) days of the parties receiving written notice of the Dismissal or Determination. Neola further suggests that the timeline for submitting a statement in OPTION 1 be equivalent to the timeframe in which an appeal has to be filed, and the timeline for submitting a statement in OPTION 2 be five (5) days. Finally, Neola suggests the appeal decision-maker have ten (10) days from receipt of the statements to issue a decision.]**

No new or additional evidence may be submitted during the **dismissal** appeal process.

The appeal decision-maker shall determine the outcome of the appeal based on the appeal decision-maker's independent review of the record (i.e., the relevant and not otherwise impermissible evidence, the feedback the parties provided to the investigator and/or decision-maker based on their review of the relevant evidence and any description of the relevant evidence that was prepared and shared with the parties, and the decision-maker's written determination) and the appeal decision-maker's application of the law and Board policy to the facts in the record. The appeal decision-maker must give due deference and due weight to the decision-maker's factual findings and credibility determinations and should not overturn them unless non-testimonial extrinsic evidence in the record justifies a contrary conclusion or unless the record read in its entirety compels a contrary conclusion. Generally, the appeal decision-maker is expected to uphold the decision-maker's determination unless the appeal decision-maker determines the decision-maker's determination is unlawful, unreasonable, or against the manifest weight of the evidence. Every reasonable presumption must be made in favor of the decision-maker's determination.

The appeal decision-maker, likely an independent third party shall

~~**[DRAFTING NOTE: The Board must select either OPTION 1 or OPTION 2 unless the Board appointed an independent third party to serve as the Board's appeal decision-maker, in which case the Board should select OPTION 3.]**~~

~~( ) [OPTION 1]~~

~~simultaneously notify the parties, in writing, of the result of the appeal and the rationale for the outcome.~~

~~[END OF OPTION 1]~~

~~[OR]~~

~~( ) [OPTION 2]~~

~~notify the Title IX Coordinator, in writing, of the result of the appeal and the rationale for the outcome. The Title IX Coordinator will then simultaneously notify the parties, in writing, of the result of the appeal and the appeal decision-maker's rationale for the outcome.~~

~~[END OF OPTION 2]~~

~~[OR]~~

**(x ) [OPTION 3]**

submit the appeal decision to the Board who will promptly adopt it as written and forward it to the Title IX Coordinator who will send it simultaneously to the parties. The appeal decision shall set forth the result of the appeal and the appeal decision-maker's rationale for the outcome.

**[END OF OPTION 3]**

**[END OF OPTIONS]**

**Supportive Measures:**

The District will offer and coordinate supportive measures as appropriate for the complainant and/or respondent to restore or preserve that person's access to the District's education program or activity or provide support during the Board's grievance procedures or during the informal resolution process. For allegations of sex discrimination other than sex-based harassment or retaliation, the District's provision of support measures does not require the District, Board employees, or any other person authorized to provide aid, benefit, or service on the District's behalf to alter the alleged discriminatory conduct for the purpose of providing a supportive measure.

The Title IX Coordinator shall determine appropriate supportive measures on a case-by-case basis. Supportive measures may vary depending on what the Title IX Coordinator deems to be reasonably available. Supportive measures may include, but are not limited to: counseling; extensions of deadlines or other course-related adjustments; school/campus escort services; increased security and monitoring of certain areas of the campus (including school buildings and facilities); restrictions on contact between the parties; leaves of absence; changes in class, work, or extra-curricular or any other activity, regardless of whether there is or is not a comparable alternative; training and education programs related to sex-based harassment; ( ) referral to Employee Assistance Program **[END OF OPTION]**; and other similar measures.

Supportive measures must not unreasonably burden either party and must be designed to protect the safety of the parties and/or the District's educational environment, or to provide support during the Board's grievance procedures or the informal resolution process.

The District will not impose such measures for punitive or disciplinary reasons.

The Title IX Coordinator may, as appropriate, modify or terminate supportive measures at the conclusion of the grievance procedures, or at the conclusion of the informal resolution process, or the District may continue them beyond that point.

The District will provide a complainant or respondent with a timely opportunity to seek, from an appropriate and impartial employee, modification or reversal of the Title IX Coordinator's decision to provide, deny, modify, or terminate supportive measures applicable to them. The impartial employee must be someone other than the employee who made the challenged decision and must have authority to modify or reverse the decision if the impartial employee determines that the decision to provide, deny, modify, or terminate the supportive measure was inconsistent with the definition of supportive measures as set forth in the Key Definitions section of this policy.

A party may seek additional modification or termination of a supportive measure applicable to them if circumstances change materially.

The District will not 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 District's education program or activity, or as otherwise permitted pursuant to the 2024 Title IX regulations.

If the complainant or respondent is an elementary or secondary student with a disability, the Title IX Coordinator shall consult with one (1) or more members, as appropriate, of the student's Individualized Education Program (IEP) team, if any, or one (1) or more members, as appropriate, of the student's Section 504 team, if any, to determine how to comply with the requirements of the IDEA and/or Section 504, in the implementation of supportive measures.

The District Administrator may place an employee respondent on administrative leave from employment responsibilities during the pendency of the Board's grievance procedures.

**Disciplinary Sanctions and Remedies:**

Following a determination that sex-based harassment occurred, the District may impose disciplinary sanctions, which may include:

**For Students**



A. Informal Discipline

1. ☒ writing assignments;
2. ☒ changing of seating or location;
3. ☒ pre-school, ☒ lunchtime, ☒ after-school **[END OF OPTIONS]** detention;
4. ☒ in-school discipline;
5. ☐ Saturday school.

B. Formal Discipline

1. suspension of bus riding/transportation privileges;
2. removal from co-curricular and/or extra-curricular activity(ies), including athletics;
3. emergency removal;
4. suspension for up to five (5) school days;
5. suspension for up to fifteen (15) consecutive school days if a notice of expulsion hearing has been sent;
6. suspension for up to ten (10) consecutive school days for each incident if the student is eligible for special education services under Chapter 115, Wis. Stats.;
7. expulsion;
8. permanent exclusion from co-curricular and/or extra-curricular activity(ies), including athletics or current class enrollment; and
9. any other sanction authorized by the Student Code of Conduct.

**For Employees**

- A. ☒ oral or written warning;
- B. ☒ written reprimands;
- C. ☒ required counseling;
- D. ☒ required training or education;
- E. ☒ demotion;
- F. ☒ suspension with pay;
- G. suspension without pay;
- H. termination and any other sanction authorized by any applicable Board Policy and/or Employee/Administrator Handbook.

The District may also provide remedies, which may include disciplinary sanctions/consequences. The Title IX Coordinator will notify the District Administrator of the recommended remedies, so an authorized administrator can consider the recommendation and implement appropriate remedies in compliance with applicable due process procedures, whether statutory or contractual.

With respect to student respondents, the Title IX Coordinator will notify the District Administrator of the recommended remedies (including disciplinary sanctions/consequences), so an authorized administrator can consider the recommendation(s) and implement an appropriate remedy(ies) in compliance with Policy 5605 – Suspension/Expulsion of Students with Disabilities, Policy 5610 - Suspension and Expulsion, ~~Policy 5610.01 – Alternative Expulsion Hearing~~

~~Procedure, Policy 5610.02 In-School Discipline, and Policy 5611 – Due Process Rights.~~ Discipline of a student respondent must comply with the applicable provisions of the Individuals with Disabilities Education Improvement Act (IDEA) and/or Section 504 of the Rehabilitation Act of 1972 ("Section 504"), and their respective implementing regulations.

**[DRAFTING NOTE: The Board should review applicable policy(ies)/administrative guidelines/employee handbooks to determine whether changes are needed to establish timelines associated with the imposition of discipline as a result of possible delays caused by the Board's obligation to follow the grievance procedures.]**

Discipline of an employee will be implemented in accordance with Federal and State law, Board policy, and applicable provisions of any relevant employee handbooks.

### **Retaliation**

Neither the Board nor any other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or this policy, or because the individual made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this policy. Intimidation, threats, coercion, or discrimination, including initiating a disciplinary process against a person for a code of conduct violation that does not involve sex discrimination but arises out of the same facts and circumstances as a complaint or information reported about possible sex discrimination, for the purpose of interfering with the exercise of any right or privilege secured by Title IX constitutes retaliation. Peer retaliation is also prohibited. Retaliation against a person for making a complaint or participating in an investigation is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Complaints alleging retaliation may be filed according to the grievance procedures set forth above. The District shall initiate its grievance procedures upon receiving any complaint alleging retaliation.

The exercise of rights protected under the First Amendment of the United States Constitution does not constitute retaliation prohibited under this policy.

Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding under this policy shall not constitute retaliation, provided, however, that a determination that sex discrimination occurred, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

### **Confidentiality**

The District will keep confidential the identity of any individual who has made a complaint of sex discrimination, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except as may be permitted by the Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C. 1232g, or FERPA regulations, 34 C.F.R. part 99, or as required by law, or to carry out the purposes of 34 C.F.R. part 106, including the conduct of any investigation, hearing, or judicial proceeding arising thereunder (i.e., the District's obligation to maintain confidentiality shall not impair or otherwise affect the complainant's and respondent's receipt of the information to which they are entitled related to the investigation and determination of whether sex discrimination occurred).

### **Application of the First Amendment**

~~The Board will construe and apply this policy consistent with the First Amendment to the U.S. Constitution ( ) and the principles of academic freedom as set forth in any Board policy or employee handbook. [END OF OPTION]. In no case will a respondent be found to have committed sex discrimination based on expressive conduct that is protected by the First Amendment ( ) and/or the principles of academic freedom specified in any Board policy or employee handbook. [END OF OPTION].~~

### **Training**

All employees, investigators, decision-makers, facilitators of informal resolution process, the Title IX Coordinator(s) and designees, and other persons who are responsible for implementing the Board's grievance procedures or have the authority to modify or terminate supportive measures shall receive training related to their duties under Title IX and this Policy. The training shall be provided promptly upon hiring or change of position that alters their duties under Title IX or this policy, and annually thereafter. The training shall not rely on sex stereotypes.

~~Training materials must be made available for inspection upon request by members of the public.~~

### **Recordkeeping**



The District shall maintain for a period of seven (7) calendar years the following records:

- A. for each complaint of sex discrimination, records documenting the informal resolution process and/or the grievance procedures followed and the resulting outcome;
- B. for each notification that the Title IX Coordinator receives of information about conduct that reasonably may constitute sex discrimination under Title IX, including notifications under 34 C.F.R. § 106.44(c)(1) or (2), records documenting the actions the District took to meet its obligations under 34 C.F.R. §106.44; and
- C. all materials used to provide the required training.

#### **~~Outside Appointments, Dual Appointments, and Delegations~~**

~~The Board retains discretion to appoint suitably qualified persons who are not Board employees to fulfill any function of the Board under this policy including, but not limited to, Title IX Coordinator, investigator, decision maker, appeal decision maker, or facilitator of the informal resolution process.~~

~~The Board also retains discretion to appoint two (2) or more persons to jointly fulfill the role of Title IX Coordinator, investigator, decision maker, appeal decision maker, and facilitator of the informal resolution process.~~

~~The District Administrator may delegate functions assigned to a specific Board employee under this policy including, but not limited to, the functions assigned to the Title IX Coordinator, investigator, decision maker, appeal decision maker, and facilitator of the informal resolution process to any suitably qualified individual and such delegation may be rescinded by the District Administrator at any time.~~

**~~[DRAFTING NOTE: The following option expressly sets forth authority that the Board has regardless of whether it is included in this policy, but is offered for those boards of education that may want to affirmatively communicate to/address these issues for readers of this policy.]~~**

#### **~~[ ] Discretion in Application~~**

~~The Board retains discretion to interpret and apply this policy in a manner that is not clearly unreasonable, even if the Board's interpretation or application differs from the interpretation of any specific complainant and/or respondent.~~

~~Despite the Board's reasonable efforts to anticipate all eventualities in drafting this policy, it is possible unanticipated or extraordinary circumstances may not be specifically or reasonably addressed by the express policy language, in which case the Board retains discretion to respond to the unanticipated or extraordinary circumstance in a way that is not clearly unreasonable.~~

~~The provisions of this policy are not contractual in nature, whether in their own right or as part of any other express or implied contract. Accordingly, the Board retains discretion to revise this policy at any time, and for any reason. The Board may apply policy revisions to an active case provided that doing so is not clearly unreasonable.~~

**~~[END OF OPTION]~~**

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Legal	19.21(6), Wis. Stats.
	120.13, Wis. Stats.
	948.01, Wis. Stats., et. seq.
	20 U.S.C. 1092(F)(6)(A)(v)
	20 U.S.C. 1400 et seq., The Individuals with Disabilities Education Improvement Act of 2004 (IDEIA)
	20 U.S.C. 1681 et seq., Title IX of the Education Amendments of 1972 (Title IX)
	34 C.F.R. Part 106
	34 U.S.C. 12291(a)(8)
	34 U.S.C. 12291(a)(10)

34 U.S.C. 12291(a)(30)

42 U.S.C. 1983

42 U.S.C. 2000c et seq., Title IV of the Civil Rights Act of 1964

42 U.S.C. 2000d et seq.

42 U.S.C. 2000e et seq.

OCR's Revised Sexual Harassment Guidance (2001)

**Last Modified by Ann DeMeuse on August 14, 2024**