
– A G E N D A –

Upon request to the Executive Assistant to the Superintendent, submitted twenty-four (24) hours in advance, the District shall make reasonable accommodation including the provision of informational material in an alternative format for a disabled person to be able to attend this meeting.

The livestream for this meeting is at:

Event address for attendees: <https://dce.webex.com/dce/onstage/g.php?MTID=ecdd0969166fc0e69b4b1d87130c9a836>

Event number: 2492 555 4186

Event password: BoardNov2021

Audio Conference Number: +1-415-655-0003

Audio Conference Access Code: 2492 555 4186

I. Call to Order

II. Roll Call

III. Pledge of Allegiance

IV. Approval of Agenda

V. Public Comment

VI. Consent Agenda

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8. po2260 Nondiscrimination and Access to Equal Educational Opportunity

D.C. Everest, in partnership with the community, is committed to being an innovative educational leader in developing knowledgeable, productive, caring, creative, responsible individuals prepared to meet the challenges of an ever-changing global society.

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I. Set Dates for January and February Meetings

X. Petitions and Communications

XI. Future Meeting Dates

A. Regular Meeting

December 15, 2021, at 6:30 p.m.

D.C. Everest Middle School Theater

9302 Schofield Ave.

Weston, WI 54476

B. Regular Meeting

January TBD, 2022, at 6:30 p.m.

D.C. Everest Middle School Theater

9302 Schofield Ave.

Weston, WI 54476

C. Regular Meeting

February TBD, 2022 at 6:30 p.m.

Middle School Theater

9302 Schofield Ave.

Weston, WI 54476

XII. Adjournment to Closed Session Following the Open Meeting Pursuant to W.S.S. 19.85(1)(c) for Discussion of Early Retirement of Staff. The Board Will Adjourn the Meeting from Closed Session.

Budget Hearing/Annual Meeting
 Wednesday, October 27, 2021 6:00 PM
 Middle School Theater
 9302 Schofield Ave.
 Weston, WI 54476



I. BUDGET HEARING

I.A. Call to Order - Roll Call

President Katie Felch called the meeting to order at 6:00 p.m. Joshua Dickerson: Present, Katie Felch: Present, Bruce Krueger: Present, Lindsey Lewitzke: Present, Corina Norrbom: Present, Larry Schaefer: Present, Yee Leng Xiong: Present. Present: 7. Lindsey was remote. 53 other attendees were present.

I.B. Pledge of Allegiance

I.C. Announce Purpose of the Budget Hearing [State Statute, Section 65.90(4)]

Yee Leng Xiong, Clerk, read the published notice.

I.D. Opening Remarks

Katie Felch, President, welcomed those in attendance.

I.E. Review Proposed 2021-2022 Budget

Matt Spets reviewed the 2021-2022 District budget.

I.F. Questions and Comments

Felch opened the meeting for questions or comments. There were none.

I.G. Adjourn Budget Hearing at 6:16 p.m.

II. SEVENTY-SECOND ANNUAL SCHOOL DISTRICT MEETING

II.A. Call to Order at 6:17 p.m.

II.B. Reading of Official Notice of Meeting

Yee Leng Xiong, Clerk, read the official published notice.

II.C. Announce Robert's Rules of Order to Prevail

Felch announced Robert's Rules of Order would prevail and Attorney Dean Dietrich was present as parliamentarian.

II.D. Elect Temporary Meeting Chairperson

Nomination of Katie Felch by Brady Mesenberg, 2206 Fantail Ave., Schofield, WI 54476 and seconded by Kelly Thompson, 221002 County Hwy J, Schofield, WI 54476. No further nominations were made after three requests. Motion carried with a voice vote.

II.E. Read and Approve Treasurer's Report

Dickerson introduced the Treasurer's Report for 2020-2021. Motion by Jeff See, 5203 Linda Street, Weston, WI 54476, second by Jeff Lindell, 5203 Isaiah Street, Schofield, WI 54476, to dispense with the reading of the 2019-2020 Treasurer's Report and approve it. Motion carried with a voice vote.

II.F. Regular Business

II.F.1. Set School Board Salaries for 2021-2022

Motion by Jennifer Zynda, 164941 Big Sandy Ave., Wausau, WI 54403, seconded by Kelly Thompson, 221002 County Hwy J, Schofield, WI 54476 to set the School Board salary at \$3,000 for 2020-2021. Motion carried with a voice vote.

II.F.2. Provide for Reimbursement of School Board Expenses as per Bylaw 0144.1

Motion by Pauline Schield, 6104 Babl Lane, Schofield, WI 54476, seconded by Jason McFarlane, 1837 Deerwood Trail, Mosinee, WI 54455, to provide for reimbursement of school Board expenses per Bylaw 0114.1. Motion carried with a voice vote.

II.F.3. Set 2021-2022 Tax Levy

Motion to set levy for 2021-2022 at \$27,577,743 by Kelly Thompson, 221002 County Hwy J, Schofield, WI 54476, seconded by Jeff Lindell, 5203 Isaiah Street, Schofield, WI 54476. Motion carried with a voice vote.

II.F.4. Set Time and Place of the 2022 Annual Meeting

Motion by Jason McFarlane, 1837 Deerwood Trail, Mosinee, WI 54455, second by Kelly Thompson, 221002 County Hwy J, Schofield, WI 54476, to authorize the Board to set the time and place of the 2022 Annual Meeting. Motion carried with a voice vote.

II.G. Felch adjourned the meeting at 6:27 p.m.

Respectfully submitted,

Yee Leng Xiong, Clerk

Ellen Suckow, Executive Assistant to the
Superintendent & School Board

PLEASE NOTE: These minutes are not the official minutes of the School Board until they are approved at the November 17, 2021, meeting of the School Board.

Regular School Board Meeting
 Wednesday, October 27, 2021 6:30 PM
 Middle School Theater
 9302 Schofield Ave.
 Weston, WI 54476



I. Call to Order at 6:33 p.m.

II. Roll Call

Joshua Dickerson: Present, Katie Felch: Present, Bruce Krueger: Present, Lindsey Lewitzke: Present (virtually), Corina Norrbom: Present, Larry Schaefer: Present, Yee Leng Xiong: Present. Also present were Superintendent Gilmore, Assistant Superintendents Spets & Nye, Executive Assistant Ellen Suckow, and Student Representative Elayna Alexander.

III. Pledge of Allegiance

IV. Approval of Agenda

Motion to approve the agenda made by Yee Leng Xiong and seconded by Joshua Dickerson, Passed with a voice vote.

V. Public Comment

Emails read:

Rachelle Gauss, 223756 Arrowhead Trail, Ringle WI, 54471

Tanya Donat, 177958 State Hwy 52, Aniwa, WI 54408

Jamie Stuedemann, 2230 Sisken Lane, Kronenewetter, WI 54455

In-Person Comment:

Daron Juneau, 9506 Heritage Hills Dr., Weston, WI 54476

Shannon Grabko, 6213 Quentin Street, Weston, WI 54476

Jasper Hartinger, 4303 Fox Run Lane, Weston, WI 54476

Noel Pupp, 5302 Fuller Street, Weston, WI 54476

Michelle Phillips, 2227 Burton Ave., Kronenewetter, WI 54455

Maria Holbrook, 172035 Hwy 52, Aniwa, WI 54408

Samantha Hansen, 3823 East Nick Ave, Schofield, WI 54476

VI. Consent Agenda

Motion to approve the Consent Agenda without Items J & K made by Yee Leng Xiong and seconded by Bruce Krueger, Passed with a roll call vote.

Joshua Dickerson: Yea, Katie Felch: Yea, Bruce Krueger: Yea, Lindsey Lewitzke: Yea, Corina Norrbom: Yea, Larry Schaefer: Yea, Yee Leng Xiong: Yea

Motion to approve Items J & K by Larry Schaefer and seconded by Corina Norrbom.

Passed with a roll call vote. Katie Felch: Abstain (With Conflict), Joshua Dickerson: Yea, Bruce Krueger: Yea, Lindsey Lewitzke: Yea, Corina Norrbom: Yea, Larry Schaefer: Yea, Yee Leng Xiong: Yea

VI.A. Approval of Minutes

VI.A.1. Approval of Minutes from October 20, 2021

VI.A.2. Approval of Minutes from September 15, 2021

VI.B. Recommended Employment/Resignations/Contract Adjustments

VI.C. Treasurer's Report - General/Other Fund Bills

VI.D. Balance Sheet

VI.E. Grant Application(s)/Budget(s) Approval

VI.F. Fundraising Requests

VI.G. Gift/Bequests

VI.G.1. CenFlex Donation to Tech Ed

VI.H. Early College Credit Requests from the Senior High

VI.I. Early College Credit Request from Idea

VI.J. Start College Now Requests from the Senior High

VI.K. Start College Now Request from Idea School

VI.L. Bus Accident Report

VI.M. Second Reading of Policies

VI.M.1. po0100 Definitions

VI.M.2. po0143 Authority of Individual Board Members

VI.M.3. po0144.2 Board Member Ethics

VI.M.4. po0174.2 School Performance Report

VI.M.5. po3170 Substance Abuse

VI.M.6. po4170 Substance Abuse

VII. Reports/Considerations

VII.A. WASB Legislative Network Member – Norrbom reported the Fall Regional meetings were nearly concluded. The State Education Convention will be held January 19-21.

VII.B. CESA #9 Representative – Krueger reported the Wisconsin Virtual School has over 6,000 students enrolled.

VII.C. Student Representative – Alexander reported winter sports sign-up was held. Fall sports have concluded with Sara Mlodik advancing to the state cross country meet and volleyball advancing to the sectional level. The marching band had their final performance. Various Halloween activities were held. Key Club had a successful blood drive.

VII.D. Superintendent

VII.D.1. Recognition of Katie Felch for Nomination for Young Professional Leadership Award

VII.D.2. Community Listening Session, Monday, October 25, Update

VII.D.3. Hatley Blue Ribbon

VII.D.4. Third Friday Count

VII.D.5. Referendum Update

VII.D.6. School Year Update

VIII. Unfinished Business

VIII.A. GET Academy

VIII.B. Approval of Band Trip to Pasadena in January 2023

Motion to approve the band trip to Pasadena in January 2023 so fundraising may continue made by Joshua Dickerson and seconded by Corina Norrbom, Passed with a voice vote.

IX. New Business

IX.A. Approval of 2021-2022 D.C. Everest Area School District Annual Budget and Tax Levy
Motion by Dickerson, seconded by Krueger to approve the 2021-2022 Expenditure Budget of \$106,495,945. Passed with a voice vote.

Motion to approve individual municipality tax levy amounts as contained in the attached documentation totaling \$27,577,743 made by Yee Leng Xiong and seconded by Larry Schaefer. Passed with a voice vote.

IX.B. Student Absences; Parent-Teacher Conferences and Inclement Weather Calendar Adjustments

Motion to approve the first two inclement weather days as non-instructional days. Virtual instruction would begin with the third inclement cancellation. Motion, made by Yee Leng Xiong and seconded by Larry Schaefer, passed with a voice vote.

IX.C. First Reading of Policies

Motion to approve the policies on first reading made by Larry Schaefer and seconded by Corina Norrbom. Passed with a voice vote.

IX.C.1. po0144.3 Conflict of Interest

IX.C.2. po0145 Board Member Anti-Harassment

IX.C.3. po0171.1 President

IX.C.4. po1422 Nondiscrimination and Equal Employment Opportunity

IX.C.5. po1422.02 Nondiscrimination Based on Genetic Information of the Employee

IX.C.6. po1623 Section 504/ADA Prohibition Against Disability Discrimination in Employment

IX.C.7. po1662 Employee Anti-Harassment

IX.C.8. po2260 Nondiscrimination and Access to Equal Educational Opportunity

IX.C.9. po2260.01 Section 504/ADA Prohibition Against Discrimination Based on Disability

IX.C.10. po3122 Nondiscrimination and Equal Employment Opportunity

IX.C.11. po3122.02 Nondiscrimination Based on Genetic Information of the Employee

IX.C.12. po3123 Section 504/ADA Prohibition Against Disability Discrimination in Employment

IX.C.13. po3362 Employee Anti-Harassment

IX.C.14. po4122 Nondiscrimination and Equal Employment Opportunity

IX.C.15. po4122.02 Nondiscrimination Based on Genetic Information of the Employee

IX.C.16. po4123 Section 504/ADA Prohibition Against Disability Discrimination in Employment

IX.C.17. po4362 Employee Anti-Harassment

IX.C.18. po5517 Student Anti-Harassment

IX.D. Election Cycle - Joshua Dickerson, Bruce Krueger, and Lindsey Lewitzke

IX.E. Possible Adjustments to Board Meeting Dates for January and February

IX.F. Invitation for a District Wellness Committee Representative. Involves One Meeting - November 4, 4:00 p.m. virtually.

X. Petitions and Communications

X.A. Thank You for Memorial Tribute from Gloria Degner

X.B. Thank You for Memorial Tribute from the Bindl Family

X.C. Thank You for Memorial Tribute from Steph Hobbins

XI. Future Meeting Dates

XI.A. Regular Board Meeting
November 17, 2021, at 6:30 p.m.
Middle School Theater
9302 Schofield Ave.
Weston, WI 54476

XI.B. Regular Board Meeting
December 15, 2021, at 6:30 p.m.
Middle School Theater
9302 Schofield Ave.
Weston, WI 54476

XI.D. Regular Board Meeting
January, TBD, 2022, at 6:30 p.m.
Middle School Theater
9302 Schofield Ave.
Weston, WI 54476

XI.E. Wisconsin State Education Convention
January 19-21, 2022
Milwaukee, WI

XII. Adjourned at 8:00 p.m.

Respectfully submitted,

Yee Leng Xiong, Clerk

Ellen Suckow, Executive Assistant to the
Superintendent & School Board

PLEASE NOTE: These minutes are not the official minutes of the School Board until they are approved at the November 17, 2021, meeting of the School Board.



Employment Report

Recommended Employment

Certified Staff

<i>Name</i>	<i>Position/Building</i>	<i>FTE</i>	<i>Start</i>
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Support Staff

<i>Name</i>	<i>Position/Building</i>	<i>FTE</i>	<i>Start</i>
Vicki Oboikovitz	Learning Advocate/MS	N/A	November 1, 2021
Julie Klinner	Learning Advocate/MS	N/A	November 1, 2021
Lisa Mork	Learning Advocate/MB	N/A	November 9, 2021
Christi Thao	Learning Advocate/MB	N/A	November 10, 2021
Abby Krueger	Cafeteria Server/WE	0.36	November 11, 2021
Jeremy Husnick	Cook I/Twin Oaks	0.23	November 11, 2021
Nicholas Ewaskowitz	Weight Room Supervisor	0.5	November 22, 2021
Rebecca Cox	Cafeteria Server/RI	0.36	Novmeber 15, 2021
Avery Petersen	Learning Advocate/RO	N/A	Novmeber 29, 2021

Students

<i>Name</i>	<i>Position/Building</i>	<i>FTE</i>	<i>Start</i>
Sadie West	Before & After Care Staff/Elementary Buildings & GFH	0.28	November 29, 2021

Seasonal Staff

<i>Name</i>	<i>Position/Building</i>	<i>Start</i>	<i>End</i>
Kam Aures	Evening/Overnight Naturalist/Twin Oaks	November 8, 2021	March 4, 2022

Resignation(s)/Retirement(s)

All Staff

<i>Name</i>	<i>Position/Building</i>	<i>Reason</i>	<i>Effective Date</i>
Tammy Frisch	K-12 Curriculum Support Secretary	Resignation	November 5, 2021

Adjustments

Certified Staff

<i>Name</i>	<i>Position From</i>	<i>Position To</i>	<i>Effective Date</i>
Benjamin Burish	Music Teacher/JH	Music Teacher/JH & Coach/EVA	August 26, 2021
Joshua Ulrich	Music Teacher/JH	Music Teacher/JH & Coach/EVA Music Teacher/JH & SH &	August 26, 2021
Ann Johnson	Music Teacher/JH & SH	Coach/EVA	August 26, 2021
Jeanette Peplinski	Social Studies Teacher/SH	Social Studies Teacher/JH & SH Chinese Teacher/JH & SH, EL	August 26, 2021
Sarah Bailey	Chinese Teacher/JH & SH	Teacher/SH & EVA	August 26, 2021

Brittany McDonnell	Speech/Language Teacher/JH, Idea, & Ody	Speech/Language Teacher/JH & Ody	August 26, 2021
Brittany McDonnell	Speech/Language Teacher/JH & Ody	Speech/Language Teacher/JH	October 11, 2021
Morgan Kafczynski	Speech/Language Teacher/EV & HA	Speech/Language Teacher/EV	October 11, 2021
Suzanne Selle	Speech/Language Teacher/RO & parochial	Speech/Language Teacher/RO	October 11, 2021

Support Staff

Name	Position From	Position To	Effective Date
Xia Yang	English Learner Assistant/WE	English Learner Assistant/WE & Hmong Parent Partner/District Wide	July 12, 2021
Candice Sillars	Secretary/IDEA & ODY	Health Assistant/JH	August 20, 2021
Mya Jablonski	Member Services	Substitute Custodian	August 30, 2021
Emily Novitzke	Member Services	Substitute Custodian	August 30, 2021
Sarah Lorge	Summer Technology Staff	Substitute Assistant	September 1, 2021
Jordyn Jakubek	Member Services	Member Services/GFH & Before & After Care Staff/Elementary Schools	September 27, 2021
Melissa Fraaza	Guest Teacher & Substitute Assistant	Naturalist/Twin Oaks	October 4, 2021
Jeremy Husnick	Coach	Coach & School Nutrition	October 11, 2021
Cheri Combs	Server/Before & After Care Staff/Substitute Assistant	Substitute & Cook I/Twin Oaks	October 11, 2021
John LePine	Weight Room Supervisor & Non-Budgeted Soccer Coach	Server/RO .27 FTE	October 18, 2021
Terrance Barkley	Housekeeper/IDEA, ODY, District Float	Non-Budgeted Soccer Coach/SH	October 25, 2021
Paige Manderfield	Housekeeper/JH	Housekeeper/IDEA, ODY, EV	October 25, 2021
Malysa Wagner	Housekeeper/Admin	Housekeeper/Admin, HA, RI	October 25, 2021
Eliese Hart	Substitute Assistant	Housekeeper/JH	October 25, 2021
Sangita Thapa	Cook I/Chef .63 FTE	Evening/Overnight	November 1, 2021
Elizabeth Consolver	Server/SH .54 FTE	Naturalist/Twin Oaks & Substitute Assistant/District Wide	November 8, 2021
Heidi Wierzba	Server/JH .36 FTE	Cook I/Chef/SH .72 FTE	November 8, 2021
Jennifer VanOoyen	School Nutrition Secretary/MS .56 FTE	Server/SH .63 FTE	November 8, 2021
Emily Zernicke	Server/SH, JH, MS	Server/JH .45 FTE	November 8, 2021
Robert Morgan	Coach - JV3 Boys Basketball	Server/JH & SH	November 8, 2021
Chi Neng Vang	Substitute Assistant	Guest Teacher/District Wide & Coach - JV3 Boys Basketball	November 10, 2021
		Member Services/GFH & Substitute Assistant	November 15, 2021

DCE Middle School				
				13
Name	Position	Begin	End	%
Kitchell, Lee Ann	Basketball 7th Girls Head Coach	1/3/22	3/3/22	7.00
Meuret, Stephanie	Basketball 7th Girls Assistant Coach	1/3/22	3/3/22	6.00
Nielsen, Joshua	Basketball 7th Boys Assistant Coach	10/19/21	12/21/21	4.50
DCE Junior High School				
Name	Position	Begin	End	%
Ellenbecker, Jordan	Basketball 8th Grade Boys Assistant	10/19/21	12/21/21	5.00
Morgan, Robert	Basketball JV3 Assistant Boys	11/15/21	3/8/22	9.00
Shulfer, Katie	Basketball 8th Girls Head Coach	1/3/22	3/3/22	6.00
DCE Senior High School				
Name	Position	Begin	End	%
Buchholz, Renee	Dance Team Head Coach (Winter)	10/25/21	3/31/22	7.00
Christensen, Allyson	Girls Basketball - Varsity Assistant Coach	11/8/21	3/12/22	11.00
Christensen, Thomas	Boys Hockey - JV Head Coach	11/8/21	3/5/22	11.00
Felch, Jon	Boys Basketball - JV Head Coach	11/15/21	3/19/22	12.00
Geier, Ann	National Honor Society	10/18/21	6/4/22	2.00
Heal, Jay	Wrestling - JV Coach	11/15/21	3/5/22	10.00
Helke, Colin	Boys Hockey - Varsity Assistant	11/8/21	3/5/22	11.00
Pagel, Gerald	Boys Basketball - Varsity Head Coach	11/15/21	3/19/22	17.00
Pritzl, Matthew	Wrestling - Varsity Assistant Coach	11/15/21	3/5/22	12.00
Reamer, Thomas	Wrestling - Varsity Head Coach	11/15/21	3/5/22	15.00
Richetto, Garrett	Swimming Varsity Boys Head Coach	11/15/21	2/19/22	17.00
Schilling, Koleman	Girls Basketball - Varsity Head Coach	11/8/21	3/12/22	15.00
Schulz, Andrew	Girls Basketball - JV Head Coach Coach	11/8/21	3/12/22	12.00
Schulz, Matthew	Boys Basketball - Varsity Assistant Coach	11/15/21	3/19/22	8.00
Vanslyke, Daniel	Boys Hockey - Varsity Head Coach	11/8/21	3/5/22	19.00
Vesper, Wendy	Dance Team Co-Assistant Coach (Winter)	10/25/21	3/31/22	3.50
Villiard, Alexandria	Dance Team Co-Assistant Coach (Winter)	10/25/21	3/31/22	3.50
Wesenick, Casey	Head Curling Coach	11/1/21	2/19/22	4.00

D.C. EVEREST AREA SCHOOL DISTRICT
 6300 ALDERSON STREET, WESTON, WI 54476
 TREASURER'S REPORT

NOVEMBER 9, 2021

CASH BALANCE AS OF OCTOBER 19, 2021	\$274,678.48	
INVESTMENT ACCOUNT TRANSFERS		\$4,054,782.48
RECEIPTS CR#304450 - CR#30516	\$5,722,009.42	
CHECKS FOR APPROVAL #230049 - #230168 ACH: #212200982-212201185		\$2,023,946.07
<u>VOIDS:</u>		
(None)	\$0.00	
CASH BALANCE AS OF NOVEMBER 9, 2021		(\$82,040.65)
	\$5,996,687.90	\$5,996,687.90
	\$5,996,687.90	\$5,996,687.90

**DC EVEREST AREA SCHOOL DISTRICT
BOARD CHECK REGISTER
(10/19/2021-11/09/2021)**

CHECK NUMBER	VENDOR	INVOICE NUMBER	CHECK DATE	AMOUNT
230049	DC EVEREST SENIOR HIGH SCHOOL	21-1011	10/22/2021	283.50
230050	LAMERS BUS LINES, INC.	583564	10/22/2021	938.00
230050	LAMERS BUS LINES, INC.	583563	10/22/2021	1,103.00
230051	STEVENS PT AREA HS SPASH	10232021	10/22/2021	225.00
230052	WI STATE TEACHERS CONFERENCE	St Peter	10/22/2021	243.75
230053	A & A LOCK SERVICE	TWINOAKS10.03.2021	10/22/2021	84.00
230053	A & A LOCK SERVICE	HS10.15.2021	10/22/2021	133.00
230054	ADVANCED FITNESS SERVICE	1627	10/22/2021	1,364.98
230055	ALLCOX, ABBY	WOR10082021	10/22/2021	35.00
230056	APPLE INC - AR	AG09401845	10/22/2021	99.00
230056	APPLE INC - AR	AG09340595	10/22/2021	99.00
230057	BOELTER COMPANIES, THE	97775958	10/22/2021	514.26
230057	BOELTER COMPANIES, THE	97775957	10/22/2021	1,361.45
230058	CDW GOVT IN EDUCATION	L913108	10/22/2021	10,000.00
230059	CONDON OIL COMPANY	T049272	10/22/2021	680.00
230059	CONDON OIL COMPANY	T049271	10/22/2021	680.00
230059	CONDON OIL COMPANY	T049270.	10/22/2021	681.09
230059	CONDON OIL COMPANY	T050702	10/22/2021	713.00
230059	CONDON OIL COMPANY	T050701	10/22/2021	713.00
230060	DCF	5000026237	10/22/2021	120.00
230061	EDUCATIONAL INNOVATIONS INC	842695-2	10/22/2021	424.80
230062	FASTENAL COMPANY	WISCH340234	10/22/2021	8.80
230063	FOUR SEASONS SCREEN PRINTING	207885	10/22/2021	151.00
230064	GOPHER SPORT, INC.	OR99545	10/22/2021	22.29
230065	GORDON FOOD SERVICE INC	213661861	10/22/2021	1.87
230065	GORDON FOOD SERVICE INC	213726926	10/22/2021	16.88
230065	GORDON FOOD SERVICE INC	213661863	10/22/2021	26.33
230065	GORDON FOOD SERVICE INC	213726920	10/22/2021	58.33
230065	GORDON FOOD SERVICE INC	21378880	10/22/2021	68.10
230065	GORDON FOOD SERVICE INC	213661857	10/22/2021	87.96
230065	GORDON FOOD SERVICE INC	213726917	10/22/2021	103.45
230065	GORDON FOOD SERVICE INC	213726929	10/22/2021	107.97
230065	GORDON FOOD SERVICE INC	213661851	10/22/2021	166.96
230065	GORDON FOOD SERVICE INC	213823928	10/22/2021	186.69
230065	GORDON FOOD SERVICE INC	213661859	10/22/2021	204.58
230065	GORDON FOOD SERVICE INC	213661865	10/22/2021	247.93
230065	GORDON FOOD SERVICE INC	213661843	10/22/2021	336.20
230065	GORDON FOOD SERVICE INC	213726931	10/22/2021	399.91
230065	GORDON FOOD SERVICE INC	213661848	10/22/2021	439.89
230065	GORDON FOOD SERVICE INC	213661856	10/22/2021	565.02
230065	GORDON FOOD SERVICE INC	213661844	10/22/2021	589.92
230065	GORDON FOOD SERVICE INC	213661864	10/22/2021	600.97
230065	GORDON FOOD SERVICE INC	213661845	10/22/2021	740.31
230065	GORDON FOOD SERVICE INC	213661866	10/22/2021	742.89
230065	GORDON FOOD SERVICE INC	213726927	10/22/2021	909.24
230065	GORDON FOOD SERVICE INC	213726925	10/22/2021	936.72
230065	GORDON FOOD SERVICE INC	213726922	10/22/2021	1,225.21
230065	GORDON FOOD SERVICE INC	213726923	10/22/2021	1,472.71
230065	GORDON FOOD SERVICE INC	213661850	10/22/2021	2,314.80
230065	GORDON FOOD SERVICE INC	213661846	10/22/2021	2,692.56
230065	GORDON FOOD SERVICE INC	213661854	10/22/2021	4,442.48
230065	GORDON FOOD SERVICE INC	213726918	10/22/2021	6,047.68

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230066	HOME INSULATION CO, INC	46596	10/22/2021	209.00
230066	HOME INSULATION CO, INC	46597	10/22/2021	244.00
230067	INSTITUTE FOR MULTI-SENSORY EDUCATION	142726	10/22/2021	89.95
230068	JOSTENS, INC.	26881317	10/22/2021	87.78
230068	JOSTENS, INC.	N002951424	10/22/2021	1,117.20
230069	JUNIOR LIBRARY GUILD, INC.	586981	10/22/2021	46.00
230070	LAMERS BUS LINES, INC.	584081	10/22/2021	93.92
230070	LAMERS BUS LINES, INC.	584080	10/22/2021	98.07
230070	LAMERS BUS LINES, INC.	584165	10/22/2021	103.27
230070	LAMERS BUS LINES, INC.	584079	10/22/2021	103.46
230070	LAMERS BUS LINES, INC.	584143	10/22/2021	106.73
230070	LAMERS BUS LINES, INC.	584071	10/22/2021	109.50
230070	LAMERS BUS LINES, INC.	584077	10/22/2021	109.62
230070	LAMERS BUS LINES, INC.	584076	10/22/2021	111.19
230070	LAMERS BUS LINES, INC.	584145	10/22/2021	113.67
230070	LAMERS BUS LINES, INC.	584140	10/22/2021	117.71
230070	LAMERS BUS LINES, INC.	584101	10/22/2021	118.47
230070	LAMERS BUS LINES, INC.	584129 replace	10/22/2021	119.80
230070	LAMERS BUS LINES, INC.	585150	10/22/2021	120.63
230070	LAMERS BUS LINES, INC.	584093	10/22/2021	121.24
230070	LAMERS BUS LINES, INC.	584128	10/22/2021	122.63
230070	LAMERS BUS LINES, INC.	584104	10/22/2021	124.91
230070	LAMERS BUS LINES, INC.	584096	10/22/2021	125.40
230070	LAMERS BUS LINES, INC.	584109	10/22/2021	127.83
230070	LAMERS BUS LINES, INC.	584139	10/22/2021	134.86
230070	LAMERS BUS LINES, INC.	584113	10/22/2021	135.83
230070	LAMERS BUS LINES, INC.	584130	10/22/2021	137.35
230070	LAMERS BUS LINES, INC.	584167	10/22/2021	137.88
230070	LAMERS BUS LINES, INC.	584105	10/22/2021	144.14
230070	LAMERS BUS LINES, INC.	584151	10/22/2021	147.13
230070	LAMERS BUS LINES, INC.	584168	10/22/2021	148.77
230070	LAMERS BUS LINES, INC.	584119	10/22/2021	148.98
230070	LAMERS BUS LINES, INC.	584078	10/22/2021	155.14
230070	LAMERS BUS LINES, INC.	584070	10/22/2021	158.19
230070	LAMERS BUS LINES, INC.	584117	10/22/2021	159.66
230070	LAMERS BUS LINES, INC.	584133	10/22/2021	160.30
230070	LAMERS BUS LINES, INC.	584099	10/22/2021	175.43
230070	LAMERS BUS LINES, INC.	584127	10/22/2021	186.51
230070	LAMERS BUS LINES, INC.	584110	10/22/2021	189.99
230070	LAMERS BUS LINES, INC.	584111	10/22/2021	192.48
230070	LAMERS BUS LINES, INC.	584154	10/22/2021	198.76
230070	LAMERS BUS LINES, INC.	584136	10/22/2021	201.94
230070	LAMERS BUS LINES, INC.	584114	10/22/2021	209.62
230070	LAMERS BUS LINES, INC.	584107	10/22/2021	210.98
230070	LAMERS BUS LINES, INC.	584106	10/22/2021	224.43
230070	LAMERS BUS LINES, INC.	584137	10/22/2021	233.27
230070	LAMERS BUS LINES, INC.	584094	10/22/2021	236.76
230070	LAMERS BUS LINES, INC.	584118	10/22/2021	244.52
230070	LAMERS BUS LINES, INC.	584097	10/22/2021	248.59
230070	LAMERS BUS LINES, INC.	584166	10/22/2021	250.35
230070	LAMERS BUS LINES, INC.	584135	10/22/2021	252.08
230070	LAMERS BUS LINES, INC.	584146	10/22/2021	256.61

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230070	LAMERS BUS LINES, INC.	584103	10/22/2021	260.45
230070	LAMERS BUS LINES, INC.	584152	10/22/2021	261.17
230070	LAMERS BUS LINES, INC.	584164	10/22/2021	264.57
230070	LAMERS BUS LINES, INC.	584148	10/22/2021	265.72
230070	LAMERS BUS LINES, INC.	584091	10/22/2021	266.49
230070	LAMERS BUS LINES, INC.	584142	10/22/2021	272.09
230070	LAMERS BUS LINES, INC.	584153	10/22/2021	272.41
230070	LAMERS BUS LINES, INC.	584116	10/22/2021	278.64
230070	LAMERS BUS LINES, INC.	584131	10/22/2021	285.35
230070	LAMERS BUS LINES, INC.	584138	10/22/2021	287.42
230070	LAMERS BUS LINES, INC.	584115	10/22/2021	292.03
230070	LAMERS BUS LINES, INC.	584124	10/22/2021	292.58
230070	LAMERS BUS LINES, INC.	584144	10/22/2021	294.31
230070	LAMERS BUS LINES, INC.	584102	10/22/2021	296.87
230070	LAMERS BUS LINES, INC.	584134	10/22/2021	302.29
230070	LAMERS BUS LINES, INC.	584163	10/22/2021	316.20
230070	LAMERS BUS LINES, INC.	584147	10/22/2021	327.87
230070	LAMERS BUS LINES, INC.	584098	10/22/2021	329.34
230070	LAMERS BUS LINES, INC.	584132	10/22/2021	331.69
230070	LAMERS BUS LINES, INC.	584092	10/22/2021	373.17
230070	LAMERS BUS LINES, INC.	584100	10/22/2021	385.54
230070	LAMERS BUS LINES, INC.	584120	10/22/2021	483.42
230070	LAMERS BUS LINES, INC.	584095	10/22/2021	501.50
230070	LAMERS BUS LINES, INC.	584108	10/22/2021	516.68
230070	LAMERS BUS LINES, INC.	584112	10/22/2021	549.96
230071	LEWIS, ASHLYN	Lewis- Scholarship	10/22/2021	1,000.00
230072	LOCKSMITH SHOPPE	15164	10/22/2021	18.00
230073	MARA CTY TREASURER'S OFFICE	21100502	10/22/2021	14.00
230074	MCGRAW HILL SCHOOL EDUC HOLDINGS, INC	120000300001	10/22/2021	522.36
230075	MEDCO SUPPLY COMPANY	IN94352141	10/22/2021	23.15
230075	MEDCO SUPPLY COMPANY	INV94322534	10/22/2021	28.52
230076	MS GRAPHICS, LLC	2014-4074	10/22/2021	105.00
230077	NAPA AUTO PARTS, INC.	826392	10/22/2021	6.29
230077	NAPA AUTO PARTS, INC.	8256565	10/22/2021	55.98
230077	NAPA AUTO PARTS, INC.	825821	10/22/2021	262.00
230078	NDSM HOLDINGS, LLC.	SEP2021	10/22/2021	28,477.08
230079	NEWSOLA, INC.	19310	10/22/2021	6,600.00
230080	PETERSON, SCOTT	OCT2021	10/22/2021	98.00
230081	ROCK RIDGE ORCHARD, LLC.	82727	10/22/2021	870.00
230082	SCHOOL DATEBOOKS, INC.	521-0209558	10/22/2021	66.89
230083	STAPLES ADVANTAGE	3490327401	10/22/2021	48.69
230083	STAPLES ADVANTAGE	3489823307	10/22/2021	71.03
230083	STAPLES ADVANTAGE	3489958068	10/22/2021	95.44
230084	TEACHER CREATED RESOURCES INC	6559187A	10/22/2021	7.98
230085	TEACHER DIRECT	inv/2021/29805	10/22/2021	34.72
230086	WI ASSN SCH DIST AD WASDA	200010716	10/22/2021	305.00
230087	WILSON LANGUAGE TRAINING	1872701	10/22/2021	42.20
230087	WILSON LANGUAGE TRAINING	1872400	10/22/2021	87.00
230087	WILSON LANGUAGE TRAINING	1867525	10/22/2021	3,013.20
230087	WILSON LANGUAGE TRAINING	1883678	10/22/2021	17,715.25
230088	KOHN LAW FIRM SC	10222021A	10/22/2021	372.69
230089	UNITED WAY OF MARATHON CNTY	20211022ADUWAY	10/22/2021	637.54

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230090	BRICKNER'S OF WAUSAU	2017 Dodge GC Charco	10/29/2021	21,594.00
230091	WI PUBLIC SERVICE	3893614329	10/29/2021	1,683.09
230092	WI SCHOOL COUNSELOR ASSN WSCA	WSCA 2021-2022	10/29/2021	465.00
230093	ABR EMPLOYMENT SERVICES	213936	10/29/2021	250.00
230094	BADGERLAND OVERHEAD DOOR LLC	22417	10/29/2021	275.00
230095	BARNES AND NOBLE	4179226	10/29/2021	400.00
230096	BLUE EDGE ENERGY	3123	10/29/2021	678.83
230097	BOELTER COMPANIES, THE	97780030	10/29/2021	60.02
230097	BOELTER COMPANIES, THE	97780029	10/29/2021	286.17
230097	BOELTER COMPANIES, THE	97780028	10/29/2021	287.30
230097	BOELTER COMPANIES, THE	97752505	10/29/2021	676.54
230097	BOELTER COMPANIES, THE	97780027	10/29/2021	1,999.51
230098	CDW GOVT IN EDUCATION	M571700	10/29/2021	1,664.00
230099	CENTRAL WI STORM GIRLS HOCKEY	CWSTORM91721	10/29/2021	150.00
230100	CONDON OIL COMPANY	12496817	10/29/2021	30.20
230101	DC EVEREST SENIOR HIGH SCHOOL	GIIRLSSOC1-1221	10/29/2021	200.00
230101	DC EVEREST SENIOR HIGH SCHOOL	2232	10/29/2021	200.00
230101	DC EVEREST SENIOR HIGH SCHOOL	21-1011A	10/29/2021	264.00
230101	DC EVEREST SENIOR HIGH SCHOOL	GIRLSSOC10122021	10/29/2021	2,229.50
230101	DC EVEREST SENIOR HIGH SCHOOL	BOYSSOC101221	10/29/2021	2,229.50
230102	FAMILY, CAREER & COMM. LEADERS OF AM.	108972	10/29/2021	29.00
230103	FASTSIGNS	629-10868	10/29/2021	65.00
230104	FEDEX, INC.	7-538-39409	10/29/2021	28.33
230105	FLINN SCIENTIFIC CO	2637346	10/29/2021	26.10
230106	GORDON FOOD SERVICE INC	15781255	10/29/2021	-112.48
230106	GORDON FOOD SERVICE INC	15756674	10/29/2021	-49.27
230106	GORDON FOOD SERVICE INC	213726924	10/29/2021	27.93
230106	GORDON FOOD SERVICE INC	213846371	10/29/2021	35.66
230106	GORDON FOOD SERVICE INC	213846383	10/29/2021	112.25
230106	GORDON FOOD SERVICE INC	213846387	10/29/2021	125.83
230106	GORDON FOOD SERVICE INC	213846377	10/29/2021	146.37
230106	GORDON FOOD SERVICE INC	213846370	10/29/2021	147.20
230106	GORDON FOOD SERVICE INC	213846381	10/29/2021	327.11
230106	GORDON FOOD SERVICE INC	213936163	10/29/2021	395.16
230106	GORDON FOOD SERVICE INC	213846386	10/29/2021	413.04
230106	GORDON FOOD SERVICE INC	213911406	10/29/2021	462.09
230106	GORDON FOOD SERVICE INC	213846375	10/29/2021	480.32
230106	GORDON FOOD SERVICE INC	213846376	10/29/2021	484.08
230106	GORDON FOOD SERVICE INC	213846369	10/29/2021	493.67
230106	GORDON FOOD SERVICE INC	213846379	10/29/2021	526.89
230106	GORDON FOOD SERVICE INC	213846378	10/29/2021	921.53
230106	GORDON FOOD SERVICE INC	213846390	10/29/2021	1,374.55
230106	GORDON FOOD SERVICE INC	213846384	10/29/2021	1,419.98
230106	GORDON FOOD SERVICE INC	213846373	10/29/2021	1,642.07
230106	GORDON FOOD SERVICE INC	213846388	10/29/2021	1,681.43
230106	GORDON FOOD SERVICE INC	213846372	10/29/2021	3,313.07
230107	JAS CONSTRUCTION, LLC	825	10/29/2021	1,119.25
230108	LAKESHORE LEARNING MATERIALS	210050100721	10/29/2021	2,904.18
230109	LAMERS BUS LINES, INC.	584067	10/29/2021	70.92
230109	LAMERS BUS LINES, INC.	584068	10/29/2021	89.21
230109	LAMERS BUS LINES, INC.	584082	10/29/2021	92.35
230109	LAMERS BUS LINES, INC.	584083	10/29/2021	98.63

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230109	LAMERS BUS LINES, INC.	584159	10/29/2021	111.43
230109	LAMERS BUS LINES, INC.	584160	10/29/2021	111.67
230109	LAMERS BUS LINES, INC.	584156	10/29/2021	117.74
230109	LAMERS BUS LINES, INC.	584149	10/29/2021	119.77
230109	LAMERS BUS LINES, INC.	584155	10/29/2021	124.20
230109	LAMERS BUS LINES, INC.	584158	10/29/2021	129.16
230109	LAMERS BUS LINES, INC.	584157	10/29/2021	136.14
230109	LAMERS BUS LINES, INC.	584084	10/29/2021	172.86
230109	LAMERS BUS LINES, INC.	584161	10/29/2021	203.25
230109	LAMERS BUS LINES, INC.	584123	10/29/2021	206.30
230109	LAMERS BUS LINES, INC.	584069	10/29/2021	244.16
230109	LAMERS BUS LINES, INC.	584162	10/29/2021	402.05
230109	LAMERS BUS LINES, INC.	584122	10/29/2021	429.82
230109	LAMERS BUS LINES, INC.	584121	10/29/2021	579.88
230110	MARSHFIELD CLINIC, INC.	185825SEP2021	10/29/2021	5,318.40
230111	MS GRAPHICS, LLC	2014-4081	10/29/2021	350.00
230112	NASP, INC.	263783	10/29/2021	203.00
230113	PROCARE SOFTWARE	INV267867	10/29/2021	3,360.00
230114	PTM DOCUMENT SYSTEMS	009868	10/29/2021	324.75
230115	REALLY GREAT READING COMPANY LLC	30847	10/29/2021	246.40
230116	SCHOLASTIC INC.	M7184930	10/29/2021	143.99
230117	STAPLES ADVANTAGE	3490472165	10/29/2021	73.75
230118	SUPER DUPER SCHOOL CO	2694442A	10/29/2021	44.90
230119	SWITS LTD	II-1026	10/29/2021	66.67
230120	SYSCO FOOD SERVICES OF BARABOO	318155130	10/29/2021	172.59
230120	SYSCO FOOD SERVICES OF BARABOO	318116726	10/29/2021	591.01
230120	SYSCO FOOD SERVICES OF BARABOO	318125886	10/29/2021	818.62
230120	SYSCO FOOD SERVICES OF BARABOO	318107972	10/29/2021	1,813.04
230120	SYSCO FOOD SERVICES OF BARABOO	318145989	10/29/2021	2,680.72
230120	SYSCO FOOD SERVICES OF BARABOO	318136961	10/29/2021	3,627.02
230121	TALENT ASSESSMENT, INC.	11644	10/29/2021	8,034.92
230122	U.S. WATER, LLC.	146236	10/29/2021	169.00
230123	ULINE	140303369	10/29/2021	1,952.87
230124	VILLAGE OF HATLEY	JUL-OCT2021	10/29/2021	267.86
230125	VOYAGER SOPRIS LEARNING INC	4432917	10/29/2021	1,115.93
230126	WALSWORTH PUBLISHING CO INC	2-07388-0	10/29/2021	4,532.85
230127	WEST MUSIC CO	SI2066076	10/29/2021	78.50
230128	KRUG BUS SERVICE, INC.	772	11/05/2021	892.00
230129	LAMERS BUS LINES, INC.	583861	11/05/2021	410.00
230130	VILLAGE DELI	9	11/05/2021	400.00
230131	ALLIANT UTILITIES/WP&L	OCT2021	11/05/2021	1,022.50
230132	BETHLEHEM COMM-RO.,INC.	BETH-4K-OCT21	11/05/2021	5,333.40
230133	BOELTER COMPANIES, THE	97784133	11/05/2021	60.02
230133	BOELTER COMPANIES, THE	97784134	11/05/2021	258.32
230134	CELLCOM - WAUSAU	487831	11/05/2021	761.34
230134	CELLCOM - WAUSAU	513867	11/05/2021	2,357.07
230135	CHEN, HAO	13553	11/05/2021	65.00
230136	COUNTRYSIDE FENCE AND SERVICES, LLC.	19957	11/05/2021	11,865.00
230137	COVER IT ALL, LLC	6746	11/05/2021	2,941.00
230138	DC EVEREST SENIOR HIGH SCHOOL	DCESH11221	11/05/2021	150.00
230139	FASTSIGNS	629-11235	11/05/2021	490.25
230140	GOPHER SPORT, INC.	CR19045.	11/05/2021	-1,905.12

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230140	GOPHER SPORT, INC.	IN100364	11/05/2021	105.91
230140	GOPHER SPORT, INC.	IN93183	11/05/2021	1,170.35
230140	GOPHER SPORT, INC.	INV90307.	11/05/2021	1,905.12
230141	GORDON FOOD SERVICE INC	213911417	11/05/2021	1.89
230141	GORDON FOOD SERVICE INC	214093515	11/05/2021	5.69
230141	GORDON FOOD SERVICE INC	214026272	11/05/2021	9.33
230141	GORDON FOOD SERVICE INC	214026262	11/05/2021	12.53
230141	GORDON FOOD SERVICE INC	213911420	11/05/2021	28.64
230141	GORDON FOOD SERVICE INC	214026276	11/05/2021	29.72
230141	GORDON FOOD SERVICE INC	213972334	11/05/2021	36.22
230141	GORDON FOOD SERVICE INC	214158751	11/05/2021	45.99
230141	GORDON FOOD SERVICE INC	214026278	11/05/2021	56.38
230141	GORDON FOOD SERVICE INC	213911400	11/05/2021	57.91
230141	GORDON FOOD SERVICE INC	213911402	11/05/2021	70.45
230141	GORDON FOOD SERVICE INC	214122945	11/05/2021	72.44
230141	GORDON FOOD SERVICE INC	213911414	11/05/2021	74.48
230141	GORDON FOOD SERVICE INC	213911410	11/05/2021	85.18
230141	GORDON FOOD SERVICE INC	214093503	11/05/2021	107.23
230141	GORDON FOOD SERVICE INC	214093505	11/05/2021	123.35
230141	GORDON FOOD SERVICE INC	214086920	11/05/2021	152.60
230141	GORDON FOOD SERVICE INC	214026269	11/05/2021	192.57
230141	GORDON FOOD SERVICE INC	214093502	11/05/2021	217.01
230141	GORDON FOOD SERVICE INC	214093506	11/05/2021	220.93
230141	GORDON FOOD SERVICE INC	214026260	11/05/2021	307.93
230141	GORDON FOOD SERVICE INC	214026267	11/05/2021	371.80
230141	GORDON FOOD SERVICE INC	214093509	11/05/2021	399.89
230141	GORDON FOOD SERVICE INC	214026271	11/05/2021	441.94
230141	GORDON FOOD SERVICE INC	213911419	11/05/2021	447.96
230141	GORDON FOOD SERVICE INC	213911413	11/05/2021	514.08
230141	GORDON FOOD SERVICE INC	213911404	11/05/2021	545.35
230141	GORDON FOOD SERVICE INC	213911418	11/05/2021	567.93
230141	GORDON FOOD SERVICE INC	214026266	11/05/2021	624.96
230141	GORDON FOOD SERVICE INC	213911421	11/05/2021	625.07
230141	GORDON FOOD SERVICE INC	214026257	11/05/2021	891.17
230141	GORDON FOOD SERVICE INC	214093514	11/05/2021	1,026.84
230141	GORDON FOOD SERVICE INC	214026274	11/05/2021	1,055.00
230141	GORDON FOOD SERVICE INC	214093517	11/05/2021	1,074.47
230141	GORDON FOOD SERVICE INC	214026263	11/05/2021	1,221.49
230141	GORDON FOOD SERVICE INC	214026258	11/05/2021	1,256.80
230141	GORDON FOOD SERVICE INC	213911407	11/05/2021	1,472.81
230141	GORDON FOOD SERVICE INC	214026270	11/05/2021	1,616.68
230141	GORDON FOOD SERVICE INC	213911411	11/05/2021	1,990.56
230141	GORDON FOOD SERVICE INC	214026264	11/05/2021	2,017.72
230141	GORDON FOOD SERVICE INC	213911415	11/05/2021	3,074.57
230141	GORDON FOOD SERVICE INC	214026256	11/05/2021	3,168.47
230141	GORDON FOOD SERVICE INC	214026268	11/05/2021	3,525.34
230141	GORDON FOOD SERVICE INC	214093504	11/05/2021	4,641.61
230142	GRAYBAR, INC.	9324058765	11/05/2021	359.86
230143	HOLIDAY WHOLESALE	9911887	11/05/2021	375.03
230144	HOME INSULATION CO, INC	46626	11/05/2021	242.00
230144	HOME INSULATION CO, INC	46641	11/05/2021	349.00
230145	HULMAN, ANGELINA	OCT2021 MILEAGE	11/05/2021	53.98

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230146	JOSTENS, INC.	27119608	11/05/2021	10.81
230147	K-TECH KLEENING SYSTEMS INC	10711	11/05/2021	1,350.00
230148	KITE, PRISCILLA	20211-1.1	11/05/2021	100.00
230149	KYLES CONSULTING LLC	OCT2021	11/05/2021	1,550.00
230150	LAMERS BUS LINES, INC.	584126	11/05/2021	117.37
230150	LAMERS BUS LINES, INC.	584125	11/05/2021	118.94
230150	LAMERS BUS LINES, INC.	584272	11/05/2021	149.48
230150	LAMERS BUS LINES, INC.	584508	11/05/2021	366,840.49
230151	MALBRIT MECHANICAL INC	183031	11/05/2021	2,719.00
230152	MARA CTY TREASURER'S OFFICE	INV01969	11/05/2021	14.00
230153	MCGRAW HILL SCHOOL EDUC HOLDINGS, INC	120000300002	11/05/2021	522.39
230153	MCGRAW HILL SCHOOL EDUC HOLDINGS, INC	120000300003	11/05/2021	522.39
230154	MIDSTATES RECREATION	SINV-03870	11/05/2021	1,605.06
230155	OTIS ELEVATOR CO	100400541613	11/05/2021	1,478.43
230156	OVERHEAD DOOR CO	28143	11/05/2021	172.50
230157	ROCK RIDGE ORCHARD, LLC.	82731	11/05/2021	270.00
230158	ST JOHN LUTHERAN SCHOOL	STJO-4K-OCT21	11/05/2021	4,800.06
230159	STAPLES ADVANTAGE	3490856034	11/05/2021	27.99
230159	STAPLES ADVANTAGE	3490856036	11/05/2021	35.90
230159	STAPLES ADVANTAGE	3491466013	11/05/2021	53.18
230159	STAPLES ADVANTAGE	3490856035	11/05/2021	104.14
230159	STAPLES ADVANTAGE	3491089779	11/05/2021	331.65
230160	STERLING WATER INC	342X09577803	11/05/2021	1,392.30
230161	STREICH EQUIPMENT CO INC	1318 CREDIT MEMO	11/05/2021	-200.00
230161	STREICH EQUIPMENT CO INC	0108280-IN	11/05/2021	10,900.00
230162	SUPER DUPER SCHOOL CO	2692185A	11/05/2021	155.71
230163	TRAVERS TOOL CO., INC	23992919-00	11/05/2021	129.91
230164	WILKE'S EXTRA SWEET ACRES, LLC	924758	11/05/2021	232.00
230165	WPS-WESTERN PSYCHOLOGICAL SERVICES	WPS-417313	11/05/2021	67.00
230166	KOHN LAW FIRM SC	11052021A	11/05/2021	372.69
230167	MARK HARRING STANDING CHAPTER 13 TRUSTEE	11052021A.	11/05/2021	441.96
230168	UNITED WAY OF MARATHON CNTY	20211105ADUWAY	11/05/2021	641.38
212200982	1ST PLACE TROPHY & ENGRAVING	3972	10/22/2021	166.00
212200983	ABLE DISTRIBUTING CO INC	S016722455.001	10/22/2021	536.98
212200984	ALPHA BAKING CO., INC.	200126275015	10/22/2021	11.70
212200984	ALPHA BAKING CO., INC.	200126303012	10/22/2021	32.34
212200984	ALPHA BAKING CO., INC.	210126021011	10/22/2021	40.83
212200984	ALPHA BAKING CO., INC.	200126275016	10/22/2021	56.82
212200984	ALPHA BAKING CO., INC.	210126140008	10/22/2021	64.68
212200984	ALPHA BAKING CO., INC.	210126140009	10/22/2021	460.29
212200985	ALVIS, LEROY JR	WOR10122021	10/22/2021	35.00
212200985	ALVIS, LEROY JR	REF101221	10/22/2021	150.00
212200986	AMAZON CAPITAL SERVICES	1VXD-XKW3-R4HF	10/22/2021	9.68
212200986	AMAZON CAPITAL SERVICES	1LQN-YM4R-LWDF	10/22/2021	15.99
212200986	AMAZON CAPITAL SERVICES	1PX6-TMG1-W11M	10/22/2021	16.03
212200986	AMAZON CAPITAL SERVICES	13PK-XYLF-RDCJ	10/22/2021	16.75
212200986	AMAZON CAPITAL SERVICES	1CNR-MNY1-7P9K	10/22/2021	18.88
212200986	AMAZON CAPITAL SERVICES	1FGN-F13P-N17C	10/22/2021	19.97
212200986	AMAZON CAPITAL SERVICES	13PK-XYLF-1VLV	10/22/2021	20.98
212200986	AMAZON CAPITAL SERVICES	1KY1-3F3T-4K1M	10/22/2021	26.00
212200986	AMAZON CAPITAL SERVICES	1GPX-PNR9-GJKF	10/22/2021	29.62
212200986	AMAZON CAPITAL SERVICES	13VW-RMRD-1MV6	10/22/2021	33.98

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212200986	AMAZON CAPITAL SERVICES	1J31-WWDV-4F1W	10/22/2021	37.28
212200986	AMAZON CAPITAL SERVICES	1VXD-XKW3-PN9G	10/22/2021	38.99
212200986	AMAZON CAPITAL SERVICES	1YDX-K6PL-QDWX	10/22/2021	39.99
212200986	AMAZON CAPITAL SERVICES	1LQN-YM4R-M7GT	10/22/2021	50.74
212200986	AMAZON CAPITAL SERVICES	1KQF-1P37-KTX4	10/22/2021	53.99
212200986	AMAZON CAPITAL SERVICES	1LQN-YM4R-16F6	10/22/2021	63.77
212200986	AMAZON CAPITAL SERVICES	11P4-XDFF-LGTC	10/22/2021	64.98
212200986	AMAZON CAPITAL SERVICES	13PK-XYLF-YRVG	10/22/2021	76.14
212200986	AMAZON CAPITAL SERVICES	19KM-MWVC-XCLW	10/22/2021	80.27
212200986	AMAZON CAPITAL SERVICES	1RNY-6TRQ-4H7T	10/22/2021	84.81
212200986	AMAZON CAPITAL SERVICES	1KY1-3F3T-636Q	10/22/2021	96.13
212200986	AMAZON CAPITAL SERVICES	1KQF-1P37-HMWM	10/22/2021	97.72
212200986	AMAZON CAPITAL SERVICES	1PHL-XDMY-6L9H	10/22/2021	101.94
212200986	AMAZON CAPITAL SERVICES	1TX4-T4GM-R4Q6	10/22/2021	104.12
212200986	AMAZON CAPITAL SERVICES	1KY9-TFYH-CPXY	10/22/2021	139.92
212200986	AMAZON CAPITAL SERVICES	1KLD-X7T7-R6WT	10/22/2021	155.04
212200986	AMAZON CAPITAL SERVICES	1Y14-QDPP-R4YM	10/22/2021	159.58
212200986	AMAZON CAPITAL SERVICES	1VMH-KMT4-6XFG	10/22/2021	179.88
212200986	AMAZON CAPITAL SERVICES	1MQG-V9CX-L116	10/22/2021	199.80
212200986	AMAZON CAPITAL SERVICES	1KL7-QTV9-QRYW	10/22/2021	216.85
212200986	AMAZON CAPITAL SERVICES	19G1-4GX1-R6Y1	10/22/2021	217.15
212200986	AMAZON CAPITAL SERVICES	1YNK-QQGQ-7361	10/22/2021	303.52
212200986	AMAZON CAPITAL SERVICES	1KQF-1P37-NDXF	10/22/2021	351.00
212200986	AMAZON CAPITAL SERVICES	149T-WCQ4-FN9H	10/22/2021	429.00
212200986	AMAZON CAPITAL SERVICES	13VW-RMRD-4MF1	10/22/2021	475.00
212200986	AMAZON CAPITAL SERVICES	1J4Y-TD4D-XP4F	10/22/2021	831.50
212200987	AMELSE, RICK	REF10142021	10/22/2021	70.00
212200988	AMERICAN WELDING & GAS INC	08107995	10/22/2021	478.37
212200989	AUSTIN, CHAD	REF10122021	10/22/2021	135.00
212200990	BUCHBERGER, LARRY	REF10521 Buch	10/22/2021	40.00
212200991	COMPLETE OFFICE OF WISCONSIN	207885	10/22/2021	660.00
212200992	DARBY DENTAL SUPPLY, LLC.	9769985	10/22/2021	725.95
212200993	DRAKE, PENNY	OCT2021 ITEM	10/22/2021	3.68
212200994	EDER, KRISTY	OCT2021 ITEM	10/22/2021	63.86
212200995	EDF ENERGY SERVICES, LLC	125537es	10/22/2021	15,367.01
212200996	FIRST SUPPLY LLC	117053-00	10/22/2021	24.00
212200996	FIRST SUPPLY LLC	116837-00	10/22/2021	39.30
212200996	FIRST SUPPLY LLC	116973-00	10/22/2021	75.75
212200996	FIRST SUPPLY LLC	116903-00	10/22/2021	114.82
212200997	FOLLETT SCHOOL SOLUTIONS, INC	342544F	10/22/2021	145.84
212200997	FOLLETT SCHOOL SOLUTIONS, INC	353415	10/22/2021	326.91
212200998	FORE-FRONT MECHANICAL, INC.	7780	10/22/2021	1,079.00
212200999	FRANCE PROPANE SERVICE	291195	10/22/2021	112.00
212201000	FULLERTON, JASON	REF101221	10/22/2021	150.00
212201001	GLYNN, JOHN	SEP2021 MILEAGE	10/22/2021	23.52
212201001	GLYNN, JOHN	SEP2021 ITEM	10/22/2021	52.71
212201002	GRAINGER INC, WW	9082524944	10/22/2021	131.13
212201003	GUNNERSON, JOHN	REF101221	10/22/2021	150.00
212201004	HARBERT, MICHAEL	WOR10142021	10/22/2021	50.00
212201005	HEID MUSIC COMPANY, INC.-APPLETON	2896178	10/22/2021	18.99
212201005	HEID MUSIC COMPANY, INC.-APPLETON	2891527	10/22/2021	30.00
212201005	HEID MUSIC COMPANY, INC.-APPLETON	2896325	10/22/2021	40.68

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212201005	HEID MUSIC COMPANY, INC.-APPLETON	2896314	10/22/2021	69.98
212201005	HEID MUSIC COMPANY, INC.-APPLETON	2896151	10/22/2021	85.00
212201005	HEID MUSIC COMPANY, INC.-APPLETON	2882925	10/22/2021	530.00
212201006	HEITING, MARK	REF102121 heating	10/22/2021	80.00
212201007	HELLER, LUKE	10521 non-district	10/22/2021	30.00
212201007	HELLER, LUKE	REF101221	10/22/2021	150.00
212201008	HOBART SALES AND SERVICE INC	ZB88615	10/22/2021	252.74
212201008	HOBART SALES AND SERVICE INC	ZB88671	10/22/2021	386.75
212201009	HORST DISTRIBUTING INC	93641-001	10/22/2021	23.17
212201009	HORST DISTRIBUTING INC	93641-000	10/22/2021	406.81
212201010	JAGLINSKI, PETER	WOR1012021	10/22/2021	35.00
212201010	JAGLINSKI, PETER	WOR10152021	10/22/2021	35.00
212201011	JULIOT, DAVID	REF101521	10/22/2021	55.00
212201011	JULIOT, DAVID	REF101221 Vball	10/22/2021	150.00
212201012	KARRELS, JASON	REF10142021	10/22/2021	100.00
212201013	KRESSMAN, AMANDA	September 2021	10/22/2021	490.00
212201014	LAACK, STEVEN	REF10152021	10/22/2021	55.00
212201015	LANGBEHN, DAVID	REF10521 Lang	10/22/2021	40.00
212201016	LINDELL, JEFF	SEP2021 MILEAGE	10/22/2021	60.76
212201017	LOR, TRUE	REF10152021	10/22/2021	90.00
212201018	LORGE, ERIC	REF10152021	10/22/2021	55.00
212201018	LORGE, ERIC	REF101221	10/22/2021	80.00
212201019	MATHIES, MICHAEL	REF10521 Mathies	10/22/2021	40.00
212201020	MATSCHKE, RANDY	REF10122021	10/22/2021	90.00
212201021	MID WISCONSIN BEVERAGE	2798605	10/22/2021	623.82
212201022	MURPHY, PATRICK	REF10152021	10/22/2021	90.00
212201023	NANOTEK DEVICE REPAIR LLC	1025	10/22/2021	110.00
212201024	NASSCO INC - CUSTODIAL	6064225	10/22/2021	-47.00
212201024	NASSCO INC - CUSTODIAL	6065022	10/22/2021	94.71
212201024	NASSCO INC - CUSTODIAL	6064570	10/22/2021	202.05
212201024	NASSCO INC - CUSTODIAL	6065021	10/22/2021	232.80
212201024	NASSCO INC - CUSTODIAL	6067119	10/22/2021	406.63
212201024	NASSCO INC - CUSTODIAL	6067087	10/22/2021	4,120.68
212201025	NYE, CASEY	SEP2021 MILEAGE	10/22/2021	86.63
212201026	PAGENKOPF, CHAD	OCT2021 ITEM	10/22/2021	264.43
212201027	PAN O GOLD BAKING CO ST CLOUD	1478814	10/22/2021	2,020.10
212201028	PLACE, AMY	OCT2021 FOOD	10/22/2021	60.12
212201029	REINHART FOODS INC	529377	10/22/2021	425.96
212201030	RENAISSANCE LEARNING	INV5208084	10/22/2021	500.00
212201031	RIEMER, AARON	OCT2021 FOOD	10/22/2021	100.00
212201032	ROMATOWSKI, LAURIE	REF101221	10/22/2021	150.00
212201033	ROTO-GRAPHIC PRINTING INC	3219-21	10/22/2021	417.00
212201034	SCHILLING, BRYAN	REF10521 add	10/22/2021	40.00
212201035	SCHOOL SPECIALTY, LLC.	308103894895	10/22/2021	185.06
212201035	SCHOOL SPECIALTY, LLC.	208128829701	10/22/2021	233.70
212201036	SCHUBRING, KIRT	WOR10122021	10/22/2021	35.00
212201037	SCHUMANN, DAVID	REF10152021	10/22/2021	145.00
212201038	SECURITY HEALTH PLAN	NOV 2021	10/22/2021	1,009,214.67
212201039	STROIK, JASON	REF10122021	10/22/2021	90.00
212201040	THAO, PANYIA	SEP2021 MILEAGE	10/22/2021	36.06
212201041	VAARA, DAVID	REF10122021	10/22/2021	135.00
212201042	VAN ERT ELECTRIC COMPANY INC.	57449	10/22/2021	325.58

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212201043	VIKING ELECTRIC SUPPLY	S005174081.001	10/22/2021	3.16
212201043	VIKING ELECTRIC SUPPLY	S005184782.00	10/22/2021	23.69
212201043	VIKING ELECTRIC SUPPLY	S005170763.001	10/22/2021	28.63
212201043	VIKING ELECTRIC SUPPLY	S005184985.001	10/22/2021	37.26
212201043	VIKING ELECTRIC SUPPLY	S005181792.001	10/22/2021	49.03
212201043	VIKING ELECTRIC SUPPLY	S005170703.001	10/22/2021	51.69
212201043	VIKING ELECTRIC SUPPLY	S005190158.001	10/22/2021	84.12
212201044	WAGNER, KARI	OCT2021 ITEM.	10/22/2021	26.56
212201045	WEBKO EMBROIDERY & SCREEN PRINTING, INC	9038	10/22/2021	921.50
212201046	WELLES, DAVID	REF101521	10/22/2021	55.00
212201047	WENDOLEK, JOSEPH	REF10122021	10/22/2021	90.00
212201048	WENDORF, MICHAEL	SEP2021 ITEM	10/22/2021	59.73
212201049	WENNINGER, ERIC	SEP-OCT2021 ITEM	10/22/2021	331.36
212201050	ZELL, CASSIE	SEP2021 MILEAGE	10/22/2021	17.92
212201050	ZELL, CASSIE	SEP2021 ITEM	10/22/2021	174.95
212201056	ABLE DISTRIBUTING CO INC	S016761060.001	10/29/2021	18.79
212201056	ABLE DISTRIBUTING CO INC	S016952549.001	10/29/2021	139.44
212201057	ALVIS, LEROY JR	WOR10212021	10/29/2021	35.00
212201058	AMAZON CAPITAL SERVICES	1J3K-HT9J-1VLK	10/29/2021	-40.48
212201058	AMAZON CAPITAL SERVICES	1QMM-YYMW-9W7W	10/29/2021	-32.51
212201058	AMAZON CAPITAL SERVICES	1XPD-1K3J-LL9D	10/29/2021	-22.95
212201058	AMAZON CAPITAL SERVICES	16TX-C3F9-YJ6C	10/29/2021	5.39
212201058	AMAZON CAPITAL SERVICES	1379-QJ9H-WWW9	10/29/2021	5.93
212201058	AMAZON CAPITAL SERVICES	1RPT-39GN-1NLP	10/29/2021	5.95
212201058	AMAZON CAPITAL SERVICES	1WHX-MJWP-1THN	10/29/2021	13.59
212201058	AMAZON CAPITAL SERVICES	1F71-19T7-1QMH	10/29/2021	14.29
212201058	AMAZON CAPITAL SERVICES	17XQ-FDNF-GWMV	10/29/2021	15.99
212201058	AMAZON CAPITAL SERVICES	1WHX-MJWP-KNKL	10/29/2021	16.25
212201058	AMAZON CAPITAL SERVICES	11QD-T67Q-4VVR	10/29/2021	19.87
212201058	AMAZON CAPITAL SERVICES	1CCW-GC31-7P63	10/29/2021	20.90
212201058	AMAZON CAPITAL SERVICES	1PX7-JGQ3-HLHD	10/29/2021	25.36
212201058	AMAZON CAPITAL SERVICES	1Q9X-LJYL-MNDJ	10/29/2021	27.20
212201058	AMAZON CAPITAL SERVICES	1YV1-6QYF-47XW	10/29/2021	35.86
212201058	AMAZON CAPITAL SERVICES	1XL7-CNGP-4FT6	10/29/2021	37.19
212201058	AMAZON CAPITAL SERVICES	1KQF-1P37-P7PW	10/29/2021	43.74
212201058	AMAZON CAPITAL SERVICES	1JL1-4QH9-XH9T	10/29/2021	59.99
212201058	AMAZON CAPITAL SERVICES	1L49-FWQ6-JFD6	10/29/2021	60.15
212201058	AMAZON CAPITAL SERVICES	1RKR-NPV3-GK77	10/29/2021	61.51
212201058	AMAZON CAPITAL SERVICES	1996-WQND-CHXG	10/29/2021	64.49
212201058	AMAZON CAPITAL SERVICES	1VRL-WH6Q-93GQ	10/29/2021	64.96
212201058	AMAZON CAPITAL SERVICES	1LRJ-CQLP-7JQ9	10/29/2021	69.93
212201058	AMAZON CAPITAL SERVICES	1CQ1-CKM9-RR3K	10/29/2021	79.73
212201058	AMAZON CAPITAL SERVICES	1FCC-NFXQ-9JF7	10/29/2021	82.16
212201058	AMAZON CAPITAL SERVICES	1M7G-XCHD-CVQP	10/29/2021	92.55
212201058	AMAZON CAPITAL SERVICES	1VXD-XKW3-XTMX	10/29/2021	94.72
212201058	AMAZON CAPITAL SERVICES	1961-DMRV-7PNQ	10/29/2021	138.56
212201058	AMAZON CAPITAL SERVICES	1379-QJ9H-XFVR	10/29/2021	139.17
212201058	AMAZON CAPITAL SERVICES	1MX1-LQWW-VMV3	10/29/2021	152.01
212201058	AMAZON CAPITAL SERVICES	1671-DYMK-K4K6	10/29/2021	167.59
212201058	AMAZON CAPITAL SERVICES	1Q9X-LJYL-1WY3	10/29/2021	192.25
212201058	AMAZON CAPITAL SERVICES	1JL1-4QH9-9CLQ	10/29/2021	224.85
212201058	AMAZON CAPITAL SERVICES	1MRN-WMMY-C9H7	10/29/2021	231.20

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212201058	AMAZON CAPITAL SERVICES	1FDW-TG7Q-1RGP	10/29/2021	263.12
212201058	AMAZON CAPITAL SERVICES	196G-FXRV-XMCC	10/29/2021	270.48
212201058	AMAZON CAPITAL SERVICES	17XQ-FDNF-6VHR	10/29/2021	634.06
212201059	AMERICAN WELDING & GAS INC	8070276	10/29/2021	53.00
212201060	ATKINSON, SCOTT	OCT2021 ITEMa	10/29/2021	16.58
212201061	BAND INSTRUMENT REPAIR SPECIALISTS	30203	10/29/2021	36.00
212201062	BERNDT, DARYL	WOR10182021	10/29/2021	30.00
212201063	BOSMAN, TOM	WOR10182021	10/29/2021	30.00
212201064	BROWN, TRAVIS	REF10182021	10/29/2021	55.00
212201065	BULLIS, KRISTINE	OCT2021 ITEM	10/29/2021	210.10
212201066	CESA 9, INC.	0000015180	10/29/2021	200.00
212201066	CESA 9, INC.	0000015050	10/29/2021	22,326.50
212201067	COMPLETE OFFICE OF WISCONSIN	207884	10/29/2021	5,785.00
212201068	DAVIS, BROOKE	OCT2021 CONF	10/29/2021	125.00
212201069	DEMCO, INC - ATTN:	7023528	10/29/2021	90.12
212201070	FISCHER, TAMMY	OCT2021 ITEM	10/29/2021	4.70
212201071	FOLLETT SCHOOL SOLUTIONS, INC	345488F	10/29/2021	54.87
212201071	FOLLETT SCHOOL SOLUTIONS, INC	353415F	10/29/2021	124.06
212201072	FOX, GRETCHEN	OCT2021 ITEM	10/29/2021	33.24
212201073	FRAAZA, MELISSA	OCT2021 ITEM	10/29/2021	50.01
212201074	GIORDANO, ERIC	REF10182021	10/29/2021	55.00
212201075	GRAINGER INC, WW	9095389111	10/29/2021	14.04
212201075	GRAINGER INC, WW	9094796696	10/29/2021	36.80
212201075	GRAINGER INC, WW	9091519539	10/29/2021	198.00
212201075	GRAINGER INC, WW	9094796688	10/29/2021	471.92
212201076	GROSSKLAUS, THOMAS	WOR10182021	10/29/2021	30.00
212201077	HAHN, NATHAN	OCT2021 FOOD	10/29/2021	51.86
212201078	HEID MUSIC COMPANY, INC.-APPLETON	2896765	10/29/2021	5.00
212201078	HEID MUSIC COMPANY, INC.-APPLETON	2900255	10/29/2021	59.00
212201078	HEID MUSIC COMPANY, INC.-APPLETON	2902679	10/29/2021	87.96
212201079	HOBART SALES AND SERVICE INC	ZB88878	10/29/2021	435.34
212201080	HOENISCH, KIMBERLY	OCT2021 ITEM	10/29/2021	70.14
212201081	J.W. PEPPER & SON	363620692	10/29/2021	18.74
212201081	J.W. PEPPER & SON	363623463	10/29/2021	19.50
212201081	J.W. PEPPER & SON	363667141	10/29/2021	27.99
212201082	JULIOT, DAVID	WOR10212021	10/29/2021	35.00
212201083	KENITZER, DICK	WOR10182021	10/29/2021	35.00
212201084	LO, FOUA	OCT2021 ITEM	10/29/2021	48.85
212201085	MACIAZ, KENNETH	OCT2021 ITEM	10/29/2021	44.56
212201086	MADISON NATL LIFE INS CO	NOV 2021	10/29/2021	19,198.98
212201087	MARCUM, CHESTER	REF10182021	10/29/2021	55.00
212201088	MCDONALD, TODD	OCT2021 ITEM	10/29/2021	125.00
212201089	MEURETT, MOLLY	OCT2021 ITEM	10/29/2021	95.95
212201090	MID WISCONSIN BEVERAGE	2799951	10/29/2021	61.00
212201090	MID WISCONSIN BEVERAGE	2799952	10/29/2021	102.24
212201090	MID WISCONSIN BEVERAGE	5588812-5588813	10/29/2021	331.18
212201091	NASSCO INC - CUSTODIAL	6067059	10/29/2021	46.17
212201091	NASSCO INC - CUSTODIAL	6067058	10/29/2021	46.95
212201091	NASSCO INC - CUSTODIAL	6067267	10/29/2021	67.35
212201091	NASSCO INC - CUSTODIAL	6070947	10/29/2021	193.26
212201091	NASSCO INC - CUSTODIAL	6067266	10/29/2021	225.48
212201091	NASSCO INC - CUSTODIAL	6071516	10/29/2021	398.46

**DC EVEREST AREA SCHOOL DISTRICT
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CHECK NUMBER	VENDOR	INVOICE NUMBER	CHECK DATE	AMOUNT
212201091	NASSCO INC - CUSTODIAL	6068566	10/29/2021	399.57
212201092	NELSON, JILL	OCT2021 ITEM	10/29/2021	147.00
212201093	NEUMAN, JODY	OCT2021 ITEM	10/29/2021	50.00
212201094	NIEVINSKI, PETER	REF10182021	10/29/2021	55.00
212201095	NORTHWAY COMMUNICATIONS INC	114662	10/29/2021	141.67
212201096	PAN O GOLD BAKING CO ST CLOUD	1480816	10/29/2021	3,323.10
212201097	PREGONT, DANIEL	WOR10182021	10/29/2021	35.00
212201098	PRO ED, INC.	29092217	10/29/2021	209.90
212201099	REINARDY, DIANNA	OCT2021 ITEM	10/29/2021	41.31
212201100	REINHART FOODS INC	541792	10/29/2021	539.27
212201100	REINHART FOODS INC	536640	10/29/2021	541.27
212201100	REINHART FOODS INC	537472	10/29/2021	741.08
212201100	REINHART FOODS INC	517137	10/29/2021	1,235.52
212201100	REINHART FOODS INC	531234	10/29/2021	2,728.49
212201101	ROSKOPF, KAITLYN	OCT2021 ITEM	10/29/2021	103.60
212201102	RYAN, DESIREE	RYAN102021	10/29/2021	110.00
212201103	SCHNECK, TRINA	OCT2021 ITEM	10/29/2021	63.90
212201104	SCHOOL SPECIALTY, LLC.	208128865395	10/29/2021	41.56
212201105	SECURIAN FINANCIAL GROUP, INC.	NOV 2021	10/29/2021	20,422.59
212201106	SEEHAFER, DAWN	OCT2021 ITEM	10/29/2021	486.03
212201107	SEELEY, CAITLIN	OCT2021 ITEM	10/29/2021	41.91
212201108	SPIEGEL, TINA	OCT2021 CONF	10/29/2021	51.27
212201109	STASHEK, JACQUELINE	OCT2021 CONF	10/29/2021	56.05
212201110	SUN PRINTING INC	123923	10/29/2021	1,113.50
212201111	TEAM SPORTING GOODS INC	AAF020888	10/29/2021	3,663.90
212201112	THAPA, SANGITA	OCT2021 MILEAGE	10/29/2021	15.46
212201113	TIENOR, JENNA	OCT2021 FOOD	10/29/2021	300.00
212201114	VANDERWYST, CHAD	REF10212021	10/29/2021	106.00
212201115	VANDERWYST, STEVE	REF10212021	10/29/2021	70.00
212201116	VIKING ELECTRIC SUPPLY	S005184782.001	10/29/2021	23.69
212201116	VIKING ELECTRIC SUPPLY	S004981476.001	10/29/2021	34.76
212201116	VIKING ELECTRIC SUPPLY	S005203292.001	10/29/2021	35.77
212201116	VIKING ELECTRIC SUPPLY	S005202915.001	10/29/2021	263.26
212201116	VIKING ELECTRIC SUPPLY	S005125453.001	10/29/2021	275.00
212201116	VIKING ELECTRIC SUPPLY	S004990606.001	10/29/2021	394.81
212201117	WAUSAU SCHOOL DISTRICT	2020-2021 TRANS REIM	10/29/2021	2,111.25
212201118	WEBKO EMBROIDERY & SCREEN PRINTING, INC	9185	10/29/2021	428.00
212201119	ADVANCED DISPOSAL SOLID WASTE MIDWEST, LLC	OCT 2021	11/05/2021	3,072.00
212201120	AMAZON CAPITAL SERVICES	1VJC-VKTW-NWPR	11/05/2021	-36.32
212201120	AMAZON CAPITAL SERVICES	1LW3-GPM1-JLHQ	11/05/2021	-15.99
212201120	AMAZON CAPITAL SERVICES	1KT3-1CQM-7Y9V	11/05/2021	17.82
212201120	AMAZON CAPITAL SERVICES	1X44-GDRM-MCM1	11/05/2021	20.39
212201120	AMAZON CAPITAL SERVICES	1NPR-191G-LP9J	11/05/2021	41.98
212201120	AMAZON CAPITAL SERVICES	1PLD-4DVP-7XCF	11/05/2021	48.57
212201120	AMAZON CAPITAL SERVICES	1QL1-PVQP-3HXJ	11/05/2021	51.98
212201120	AMAZON CAPITAL SERVICES	19FC-VNXH-GYMF	11/05/2021	70.75
212201120	AMAZON CAPITAL SERVICES	1NM9-3CW4-YYV6	11/05/2021	84.66
212201120	AMAZON CAPITAL SERVICES	1TYL-NXR3-KXDG	11/05/2021	96.57
212201120	AMAZON CAPITAL SERVICES	1T1F-QD4F-3394	11/05/2021	115.03
212201120	AMAZON CAPITAL SERVICES	1LW3-GPM1-MGDV	11/05/2021	126.91
212201120	AMAZON CAPITAL SERVICES	1NPR-191G-CTQX	11/05/2021	130.70
212201120	AMAZON CAPITAL SERVICES	1WHX-MJWP-3TP1	11/05/2021	131.97

**DC EVEREST AREA SCHOOL DISTRICT
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212201120	AMAZON CAPITAL SERVICES	1CDV-CYDJ-1MWJ	11/05/2021	277.22
212201120	AMAZON CAPITAL SERVICES	1FNL-L1RF-QGRJ	11/05/2021	366.70
212201120	AMAZON CAPITAL SERVICES	1YMQ-PRQ3-9JQ7	11/05/2021	474.50
212201121	AMERICAN WELDING & GAS INC	08141799	11/05/2021	121.70
212201122	AMERICAN ENGNR TESTING INC	INV-045690	11/05/2021	16,850.00
212201123	ASPIRUS YMCA CHILD DEV CTR	YMCA-4K-OCT21	11/05/2021	25,066.98
212201124	ATKINSON, SCOTT	OCT2021 ITEMb	11/05/2021	10.09
212201125	BAILEY, SARAH	OCT2021 MILEAGE	11/05/2021	21.28
212201126	BARWICK, CAMDEN	LIFEGUARD	11/05/2021	190.00
212201127	BOHLMAN, TAMMY	OCT2021 ITEM	11/05/2021	22.24
212201128	BRAUN, LISA	OCT2021 ITEMa	11/05/2021	47.33
212201129	BURDICK, THOMAS	OCT2021 MILEAGE	11/05/2021	143.47
212201130	DALEY, MICHELLE	OCT2021 MILEAGE	11/05/2021	6.72
212201131	DAVIES, THOMAS	OCT2021 ITEM	11/05/2021	4.49
212201132	ESPELAND, HEATHER	SEP2021 ITEM	11/05/2021	30.80
212201133	EVERYDAY SPEECH LLC	011496	11/05/2021	1,619.94
212201134	FIRST SUPPLY LLC	117229-00	11/05/2021	-104.15
212201134	FIRST SUPPLY LLC	117627-00	11/05/2021	15.56
212201134	FIRST SUPPLY LLC	117245-00	11/05/2021	33.03
212201134	FIRST SUPPLY LLC	117430-00	11/05/2021	49.76
212201134	FIRST SUPPLY LLC	117748-00	11/05/2021	60.84
212201135	FOREMAN, RONALD	NOV2021	11/05/2021	60.00
212201136	FRISCH, TAMMY	OCT2021 MILEAGE	11/05/2021	13.38
212201137	GADKE, GARY	OCT2021 MILEAGE	11/05/2021	8.96
212201138	GEBERT, SAMANTHA	OCT2021 MILEAGE	11/05/2021	13.44
212201139	GILBERTSON, KENDRA	OCT2021a ITEM	11/05/2021	22.36
212201140	GRAINGER INC, WW	9099099443	11/05/2021	35.85
212201140	GRAINGER INC, WW	9099387160	11/05/2021	201.74
212201141	HALL, KIMBERLY	OCT2021 MILEAGE	11/05/2021	164.75
212201142	HEBEIN, HALEY	OCT2021 MILEAGE	11/05/2021	169.46
212201143	HEID MUSIC COMPANY, INC.-APPLETON	2873460	11/05/2021	22.75
212201143	HEID MUSIC COMPANY, INC.-APPLETON	249078	11/05/2021	44.20
212201143	HEID MUSIC COMPANY, INC.-APPLETON	2878578	11/05/2021	49.50
212201143	HEID MUSIC COMPANY, INC.-APPLETON	2878597	11/05/2021	120.43
212201144	HORST DISTRIBUTING INC	93929-001	11/05/2021	57.68
212201144	HORST DISTRIBUTING INC	93929-000	11/05/2021	742.54
212201145	HOSTVEDT, JAMES	OCT2021 MILEAGE	11/05/2021	74.09
212201146	J.W. PEPPER & SON	363676807	11/05/2021	65.00
212201147	KEY TO LIFE CHILDCARE CENTER, INC.	KYLF-4K-OCT21	11/05/2021	9,866.79
212201148	KINDER CARE LEARNING CTR, INC.	KIND-4K-OCT21	11/05/2021	8,266.77
212201149	KRENTZ, SARAH	OCT2021 MILEAGE	11/05/2021	22.40
212201150	LAMMERT, SARAH	OCT2021 ITEM	11/05/2021	105.17
212201151	LIGHTSPEED TECHNOLOGIES INC	137332	11/05/2021	10.00
212201152	LLOYD, YOLANDA	OCT2021 ITEM	11/05/2021	24.56
212201153	M3 INSURANCE SOLU INC	66077	11/05/2021	46,611.00
212201154	MANION EDUCATIONAL SERVICES, LLC.	NOV2021	11/05/2021	60.00
212201155	MARA CTY CHILD DEVELOPMENT	MCCDA-4K-OCT21	11/05/2021	4,000.05
212201156	MARATHON PEST CONTROL	43275	11/05/2021	28.00
212201156	MARATHON PEST CONTROL	43304	11/05/2021	28.00
212201156	MARATHON PEST CONTROL	43274	11/05/2021	35.00
212201156	MARATHON PEST CONTROL	43286	11/05/2021	40.00
212201157	MAXWELL MEDALS & AWARDS INC.	3169873-IN	11/05/2021	73.10

**DC EVEREST AREA SCHOOL DISTRICT
BOARD CHECK REGISTER
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CHECK NUMBER	VENDOR	INVOICE NUMBER	CHECK DATE	AMOUNT
212201158	MC MILLAN-HEHIR, HEATHER	OCT2021 MILEAGE	11/05/2021	41.66
212201159	MERZ, SARAH	OCT2021 ITEM	11/05/2021	78.53
212201160	MID WISCONSIN BEVERAGE	2801370	11/05/2021	105.00
212201160	MID WISCONSIN BEVERAGE	2801371	11/05/2021	394.03
212201161	MOUNT OLIVE 4K PROGRAM	MTOL-4K-OCT21	11/05/2021	6,400.08
212201162	NASSCO INC - CUSTODIAL	6070414	11/05/2021	34.62
212201162	NASSCO INC - CUSTODIAL	6070337	11/05/2021	67.35
212201162	NASSCO INC - CUSTODIAL	6070323	11/05/2021	112.75
212201162	NASSCO INC - CUSTODIAL	6010322	11/05/2021	141.06
212201162	NASSCO INC - CUSTODIAL	6072766	11/05/2021	8,523.27
212201162	NASSCO INC - CUSTODIAL	6075673	11/05/2021	29,102.69
212201163	NATL ELEVATOR INSPECTION SERVICES, INC.	RI21012028	11/05/2021	82.00
212201164	NATZKE, ANDREW	OCT2021 ITEM	11/05/2021	7.99
212201165	NEWMAN CATHOLIC-ST MARK	STMA-4K-OCT21	11/05/2021	7,466.76
212201166	NEWMAN CATHOLIC-ST THERESE	STTH-4K-OCT21	11/05/2021	9,668.69
212201167	OLLHOFF, BRITTANY	OCT2021 ITEM	11/05/2021	100.00
212201168	PARKIN, KELSEY	OCT2021 ITEM	11/05/2021	125.00
212201169	PER MAR SECURITY SERVICES, INC.	2636752	11/05/2021	114.50
212201169	PER MAR SECURITY SERVICES, INC.	2636750	11/05/2021	219.50
212201170	PICKRUHN, TERESE	OCT2021 MILEAGE	11/05/2021	148.57
212201171	REINHART FOODS INC	548289	11/05/2021	1,541.35
212201171	REINHART FOODS INC	543264	11/05/2021	2,557.73
212201171	REINHART FOODS INC	545526	11/05/2021	2,840.12
212201172	REINTJES, GINGER	AUG2021 ITEM	11/05/2021	112.95
212201173	RESCH, KAMI	OCT2021 ITEM	11/05/2021	67.49
212201174	SCHLINKMANN, SUSAN	OCT2021 ITEM	11/05/2021	25.84
212201175	SCHOOL SPECIALTY, LLC.	202501809997	11/05/2021	84.90
212201175	SCHOOL SPECIALTY, LLC.	208128875659	11/05/2021	323.30
212201176	SEEHAFER, EMILY	NOV2021 ITEM	11/05/2021	79.00
212201177	SUTTON, JESSICA	OCT2021 ITEM	11/05/2021	55.00
212201178	TAYLOR, JULIANN	OCT2021 MILEAGE	11/05/2021	208.20
212201179	TIENOR, JENNA	OCT2021 MILEAGE	11/05/2021	40.54
212201180	TREPTOW, FELECITY	OCT2021 MILEAGE	11/05/2021	27.61
212201181	TSA CONSULTING GROUP, INC.	71936	11/05/2021	285.76
212201182	VANG, YING	OCT2021 FOOD	11/05/2021	63.08
212201183	VIKING ELECTRIC SUPPLY	S005239429.001	11/05/2021	2.87
212201183	VIKING ELECTRIC SUPPLY	S005230064.001	11/05/2021	9.08
212201183	VIKING ELECTRIC SUPPLY	S005216824.002	11/05/2021	103.49
212201183	VIKING ELECTRIC SUPPLY	S005216824.001	11/05/2021	130.35
212201184	WAUSAU CHILD CARE-CEDAR CR,INC.	WACC-4K-OCT21	11/05/2021	4,533.39
212201185	WEINKAUF, TONI	WEINKAUF103121	11/05/2021	431.00
				2,023,946.07

**DC EVEREST AREA SCHOOL DISTRICT
47/49 BOARD CHECK REGISTER
(10/19/2021-11/09/2021)**

CHECK NUMBER	VENDOR	INVOICE NUMBER	CHECK DATE	AMOUNT
4900522	AIR QUALITY CONTROL, LLC	BP12 PA6 SEP REF MS	10/22/21	12,806.00
4900523	B & P MECHANICAL, INC.	BP11 PA5 SEP REF HAT	10/22/21	2,460.60
4900524	EGI MECHANICAL, INC	BP8 PA8 SEP REF EV	10/22/21	16,072.37
4900524	EGI MECHANICAL, INC	BP8 PA9 SEP REF EV	10/22/21	12,042.87
4900525	GREENFIRE MANAGEMENT SERVICES, LLC	BP12 PA7 SEP REF MS	10/22/21	49,097.90
4900526	H.J. MARTIN AND SON, INC	BP7 PA14 SEP REF SH	10/22/21	1,159.39
4900527	HAAS SONS INC.	BP8 PA3 SEP REF EV	10/22/21	39,172.50
4900527	HAAS SONS INC.	BP9 PA3 SEP REF RIV	10/22/21	97,960.50
4900528	HOOPER CORPORATION	BP9 PA11 SEP REF RIV	10/22/21	6,144.60
4900529	PGA PLUMBING INC	BP3 PA16F SEP REF RO	10/22/21	19,111.37
4900530	SCHERRER CONSTRUCTION CO. INC.	BP8 PA12 SEP REF EV	10/22/21	88,360.44
4900531	SERVICEMASTER COMMERCIAL SERVICES	BP9 PA51269 SEP REF	10/22/21	9,100.00
4900532	SMA CONSTRUCTION SERVICES	BP7 PA7 SEP REF SH	10/22/21	56,546.22
4900533	SOMERVILLE ARCHITECTS	37302	10/22/21	5,068.50
4900534	COUNTRYSIDE FENCE AND SERVICES, LLC.	19958	11/5/21	3,673.00
4900535	MOBILE WAREHOUSE, LLC	25378	11/5/21	100.00
4900536	TITO INC	13810	11/5/21	802.49
212201051	C.D. SMITH CONSTRUCTION, INC.	BP6 PA15 SEP REF WE	10/22/21	150,200.60
212201052	MAVO SYSTEMS, LLC	8016 SEP RLE MS	10/22/21	70,732.06
212201052	MAVO SYSTEMS, LLC	BP7 PA7950 SEP REF S	10/22/21	33,253.90
212201053	NEXUS SOLUTIONS, LLC	1355 SEP RLE HAT	10/22/21	126,014.13
212201053	NEXUS SOLUTIONS, LLC	1355 SEP RLE EV	10/22/21	24,833.46
212201053	NEXUS SOLUTIONS, LLC	1355 SEP RLE RIV	10/22/21	83,623.03
212201053	NEXUS SOLUTIONS, LLC	1355 SEP RLE RO	10/22/21	11,944.00
212201053	NEXUS SOLUTIONS, LLC	1355 SEP RLE WE	10/22/21	59,356.30
212201053	NEXUS SOLUTIONS, LLC	1355 SEP RLE MS	10/22/21	45,178.66
212201053	NEXUS SOLUTIONS, LLC	1355 SEP RLE JH	10/22/21	58,310.15
212201053	NEXUS SOLUTIONS, LLC	1355 SEP RLE SH	10/22/21	290,816.98
212201053	NEXUS SOLUTIONS, LLC	1356 SEP REF RO	10/22/21	15,760.00
212201053	NEXUS SOLUTIONS, LLC	1356 SEP REF WE	10/22/21	17,641.60
212201053	NEXUS SOLUTIONS, LLC	1356 SEP REF MS	10/22/21	2,410.42
212201053	NEXUS SOLUTIONS, LLC	1356 SEP REF JH	10/22/21	4,441.65
212201053	NEXUS SOLUTIONS, LLC	1356 SEP REF SH	10/22/21	11,760.60
212201054	NORTHSTAR ENVIRONMENTAL TESTING, LLC	BP4 PA210-443 SEP RE	10/22/21	19,335.00
212201055	TOTAL ELECTRIC, INC.	BP8 PA17 SEP REF EV	10/22/21	7,092.00
212201055	TOTAL ELECTRIC, INC.	BP12 PA6 SEP REF MS	10/22/21	44,475.00
	BLINDSMADEINUSA.COM	PCARD PURCHASE	10/20/21	6,591.75

1,503,450.04

**DC EVEREST AREA SCHOOL DISTRICT
PCARD ACTIVITY
(10/09/2021-11/01/2021)**

Tran Date	Where Used	District Card Name	Amount
10/11/2021	Greenheck Field House-, Schofield, WI, 54476, US	MULL, AARON	-15.00
10/11/2021	Greenheck Field House-, Schofield, WI, 54476, US	MULL, AARON	-15.00
10/11/2021	Greenheck Field House-, Schofield, WI, 54476, US	MULL, AARON	-15.00
10/11/2021	Greenheck Field House-, Schofield, WI, 54476, US	MULL, AARON	-15.00
10/11/2021	Amzn Mktp US 276h93bz1, Amzn.Com/Bill, WA, 98109, US	RAVEY, TRACY	14.90
10/11/2021	Greenheck Field House-, Schofield, WI, 54476, US	MULL, AARON	15.00
10/11/2021	Greenheck Field House-, Schofield, WI, 54476, US	MULL, AARON	15.00
10/11/2021	Southside Tire Schofie, Schofield, WI, 54476, US	SUCHOMSKI, JOHN	33.39
10/11/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	JABLONSKI, JAMIE A	45.81
10/11/2021	Menards Wausau Wi, Wausau, WI, 54401, US	HERNING, CODY	99.99
10/11/2021	Bestbuycom806500474807, 888bestbuy, MN, 55423, US	RAVEY, TRACY	119.99
10/11/2021	Heggerty Literacy Res, Oak Park, IL, 60302, US	SABEY, RENA	129.58
10/11/2021	Amazon.Com 278aw5p00 A, Amzn.Com/Bill, WA, 98109, US	RAVEY, TRACY	158.55
10/11/2021	Voyager Sopris Learning, 800-547-6747, TX, 75287, US	SABEY, RENA	162.23
10/11/2021	Amzn Mktp US 273tu83p2, Amzn.Com/Bill, WA, 98109, US	RAVEY, TRACY	282.66
10/11/2021	Amzn Mktp US 278x95aa0, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	382.40
10/11/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	MEYER, MELISSA	749.88
10/11/2021	Spectrum, 855-707-7328, MO, 63131, US	RAVEY, TRACY	9,564.36
10/12/2021	Pick N Save #406, Schofield, WI, 54476, US	SPETS, MATT	8.18
10/12/2021	Schofield Oriental Mar, Schofield, WI, 54476, US	STROIK, MIRANDA	12.95
10/12/2021	Amzn Mktp US 277op6hd0, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	25.75
10/12/2021	Paddle.Net Craftpix, Astoria, NY, 11105, US	FRISCH, TAMMY	36.00
10/12/2021	The Webstaurant Store, 717-392-7472, PA, 17602, US	FRISCH, TAMMY	80.89
10/12/2021	Chs Chesskid.Com, 800-3182827, UT, 84020, US	KAMPMANN, KEVIN	88.00
10/12/2021	Dpi Educator Licensing, 608-2669616, WI, 53703, US	JABLONSKI, JAMIE A	100.00
10/12/2021	Dpi Educator Licensing, 608-2669616, WI, 53703, US	JABLONSKI, JAMIE A	100.00
10/12/2021	Northern Battery 1100, Schofield, WI, 54476, US	HERNING, CODY	106.84
10/12/2021	Pick N Save #406, Schofield, WI, 54476, US	STROIK, MIRANDA	125.14
10/12/2021	Amzn Mktp US 274sc1q81, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	133.60
10/12/2021	Amzn Mktp US 272fe70z2, Amzn.Com/Bill, WA, 98109, US	RAVEY, TRACY	519.98
10/13/2021	Samsclub #6535, Wausau, WI, 54401, US	MEYER, MELISSA	44.78
10/13/2021	Speakinglatino.Com, 7872685292, 00907, PR	DALEY, MICHELLE	67.00
10/13/2021	Pick N Save #404, Rothschild, WI, 54474, US	KOEPKE, RICHARD	109.32
10/13/2021	Pick N Save 5406, 866-611-1979, WI, 54476, US	STROIK, MIRANDA	117.93
10/13/2021	Wieser Educational Inc, Rancho Santa, CA, 92688, US	SEEHAFER, DAWN	501.75
10/14/2021	Amzn Mktp Us, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	-314.72
10/14/2021	Menards Wausau Wi, Wausau, WI, 54401, US	MULL, AARON	6.16
10/14/2021	Amzn Mktp US 273cm0ri1, Amzn.Com/Bill, WA, 98109, US	RAVEY, TRACY	7.50
10/14/2021	Weston Hardware, Weston, WI, 54476, US	HINSON, DERALD	10.99
10/14/2021	Napa Parts Schofield, Schofield, WI, 54476, US	WAKSMONSKI, MIKE	18.99
10/14/2021	Amzn Mktp US 278gx3u91, Amzn.Com/Bill, WA, 98109, US	MULLALEY, JESSICA	46.98
10/14/2021	Kwik Trip 85100008516, Wausau, WI, 54401-0000, US	SPETS, MATT	47.91
10/14/2021	Dbc Blick Art Material, 800-447-1892, IL, 61401, US	DALEY, MICHELLE	61.68
10/14/2021	Samsclub #6535, Wausau, WI, 54401, US	SEEHAFER, DAWN	75.15
10/14/2021	Menards Wausau Wi, Wausau, WI, 54401, US	MULL, AARON	116.68
10/14/2021	Greater Wausau Chamber, 7158456231, WI, 54403, US	NYE, CASEY	150.00
10/14/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	JAKUBEK, JACQUE	195.40
10/14/2021	Jacks Small Engines &, 9999999999, MD, 21084, US	PERNSTEINER, CHAD	373.36
10/15/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	HALL, KIM	-41.42
10/15/2021	Pick N Save #404, Rothschild, WI, 54474, US	KOEPKE, RICHARD	3.62

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Tran Date	Where Used	District Card Name	Amount
10/15/2021	Amzn Mktp US 2y8g64cv1, Amzn.Com/Bill, WA, 98109, US	JAKUBEK, JACQUE	6.99
10/15/2021	Walgreens #9609, Weston, WI, 54476, US	SPETS, MATT	15.16
10/15/2021	Amzn Mktp US 2768m35w2, Amzn.Com/Bill, WA, 98109, US	MULLALEY, JESSICA	53.97
10/15/2021	Trigs, Schofield, WI, 54476, US	MEYER, MELISSA	58.51
10/15/2021	Amazon.Com 2y0xl5cl1 A, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	64.99
10/15/2021	Amzn Mktp US 273h80hq2, Amzn.Com/Bill, WA, 98109, US	RAVEY, TRACY	70.00
10/15/2021	Otter.Ai, Mountain View, CA, 94040, US	JABLONSKI, JAMIE A	99.99
10/15/2021	The Bold Look Usa Llc, 8002302653, FL, 33147, US	WEGGE, KAREN A	111.87
10/15/2021	Amzn Mktp US 2y0a99c81, Amzn.Com/Bill, WA, 98109, US	JAKUBEK, JACQUE	117.93
10/15/2021	Pick N Save 5406, 866-611-1979, WI, 54476, US	STROIK, MIRANDA	131.31
10/15/2021	Greater Wausau Chamber, 7158456231, WI, 54403, US	SUCKOW, ELLEN	150.00
10/15/2021	The Home Depot #4931, Wausau, WI, 544010000, US	WEGGE, KAREN A	170.10
10/15/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	HALL, KIM	210.42
10/15/2021	Truck Equipment, 9203212441, WI, 54307, US	SUCHOMSKI, JOHN	272.55
10/15/2021	Learning A-Z, Llc, 866-889-3729, TX, 75287, US	KEMP, JANE	470.25
10/15/2021	Lincoln Contractors Su, Weston, WI, 54476, US	SUCHOMSKI, JOHN	1,226.25
10/15/2021	Frontier Comm Corp Web, 8009218101, CT, 06851, US	RAVEY, TRACY	2,312.37
10/18/2021	Walmart.Com Aa, 8009666546, AR, 72716, US	JABLONSKI, JAMIE A	16.98
10/18/2021	Walmart.Com Aa, 800-966-6546, AR, 72716, US	JAKUBEK, JACQUE	23.72
10/18/2021	Amzn Mktp US 279y336f2, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	30.75
10/18/2021	Amzn Mktp US 2y41c5o30, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	41.97
10/18/2021	Menards Wausau Wi, Wausau, WI, 54401, US	HERNING, CODY	66.98
10/18/2021	Smore.Com - Educator, Pittsburgh, PA, 15206, US	KAMPMANN, KEVIN	79.00
10/18/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	NYE, CASEY	82.31
10/18/2021	Amzn Mktp US 2y6oh5ld1, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	115.79
10/18/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	NYE, CASEY	133.90
10/18/2021	The Home Depot #4931, Wausau, WI, 544010000, US	HERNING, CODY	149.00
10/18/2021	The Store 59, Weston, WI, 54476, US	SUCHOMSKI, JOHN	160.00
10/18/2021	Pick N Save #406, Schofield, WI, 54476, US	STROIK, MIRANDA	176.38
10/18/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	MULLALEY, JESSICA	239.34
10/18/2021	Country Inn And Suites, Roseville, MN, 551130000, US	NYE, CASEY	240.62
10/18/2021	Country Inn And Suites, Roseville, MN, 551130000, US	NYE, CASEY	240.62
10/18/2021	Country Inn And Suites, Roseville, MN, 551130000, US	NYE, CASEY	240.62
10/18/2021	Audible 2y4ok6fc1, Amzn.Com/Bill, NJ, 07102, US	WELLER, JULIE	242.12
10/18/2021	Les Mills US Trading, 6308285949, IL, 21236, US	MULL, AARON	529.00
10/18/2021	The Home Depot #4931, Wausau, WI, 544010000, US	WEGGE, KAREN A	618.81
10/18/2021	Apple.Com/Us, 800-676-2775, CA, 95014, US	RAVEY, TRACY	890.00
10/18/2021	Bennett Hardwoods Inc, Wausau, WI, 54401, US	PERNSTEINER, CHAD	2,838.00
10/19/2021	B-Lux Gril, Wisc Dells, WI, 53965, US	HALL, KIM	50.69
10/19/2021	Fastenal Company 01wis, 507-453-8920, WI, 54476, US	HERNING, CODY	73.27
10/19/2021	Sp Hand Picked Nurse, Willow Spring, NC, 27592, US	FRISCH, TAMMY	87.80
10/19/2021	Barcodesinc, 312-588-5960, IL, 60606, US	MULL, AARON	139.46
10/19/2021	Samsclub #6535, Wausau, WI, 54401, US	MULLALEY, JESSICA	190.78
10/19/2021	Apperson Inc., Cerritos, CA, 90703, US	FRISCH, TAMMY	191.62
10/19/2021	Fbla-Pbl, 7038603334, VA, 20191, US	FRISCH, TAMMY	253.00
10/19/2021	Sp Amhydro, Arcata, CA, 95521, US	FRISCH, TAMMY	328.90
10/20/2021	Cpm Educational Progra, 209-7452055, CA, 957580000, US	FRISCH, TAMMY	-100.00
10/20/2021	Sp Scenic Hill Farm, Albany, OR, 97321, US	FRISCH, TAMMY	-33.95
10/20/2021	W. Atlee Burpee Compan, 2156744900, PA, 18974, US	FRISCH, TAMMY	7.94
10/20/2021	Bib Background Checks, Huntersville, NC, 28078, US	HALL, KIM	14.00

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10/20/2021	Uber Trip, 8005928996, CA, 94105, US	NYE, CASEY	17.43
10/20/2021	Sp Gardensupplyguys, Green Bay, WI, 54303, US	FRISCH, TAMMY	20.74
10/20/2021	Weston Hardware, Weston, WI, 54476, US	JABLONSKI, JASON	22.19
10/20/2021	Brioche Doree C-19 Ord, Chicago, IL, 60666, US	NYE, CASEY	22.89
10/20/2021	Ncte, Champaign, IL, 61820, US	DALEY, MICHELLE	25.00
10/20/2021	Trigs, Schofield, WI, 54476, US	MEYER, MELISSA	26.91
10/20/2021	Sp Zipgrow Inc, Cornwall, ON, K6J 2S7, CA	FRISCH, TAMMY	36.27
10/20/2021	J.W. Pepper, 8003456296, PA, 19341, US	DALEY, MICHELLE	45.58
10/20/2021	The Webstaurant Store, 717-392-7472, PA, 17602, US	FRISCH, TAMMY	51.76
10/20/2021	Staples Direct, 800-3333330, MA, 01702, US	MULL, AARON	54.99
10/20/2021	Walmart.Com Aa, 8009666546, AR, 72716, US	JAKUBEK, JACQUE	78.84
10/20/2021	Hemostat Labratories I, 707-6789594, CA, 95620-9779, US	FRISCH, TAMMY	79.50
10/20/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	HALL, KIM	104.00
10/20/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	WEGGE, KAREN A	109.00
10/20/2021	In Glacier Valley Ent, 608-3562244, WI, 53913, US	FRISCH, TAMMY	110.00
10/20/2021	Kalahari Resort - Wi E, 1305 Kalahari, WI, 53965, US	MULL, AARON	117.00
10/20/2021	Autogrow America, 707-206-2220, CA, 95501, US	FRISCH, TAMMY	200.14
10/20/2021	Cpm Educational Progra, 209-7452055, CA, 957580000, US	FRISCH, TAMMY	300.00
10/20/2021	Wisconsin Park And Rec, Milwaukee, WI, 53214, US	MULL, AARON	300.00
10/20/2021	4imprint, 877-4467746, WI, 54901, US	MULL, AARON	723.60
10/20/2021	Carquest 2345, Schofield, WI, 54476, US	SUCHOMSKI, JOHN	1,077.37
10/20/2021	Wave - Machine Repair, 920-6392342, WI, 54217, US	FRISCH, TAMMY	1,092.50
10/20/2021	Cdw Govt #m342357, 800-808-4239, IL, 60061, US	RAVEY, TRACY	2,130.00
10/21/2021	Macs Lake Delton, Baraboo, WI, 53913, US	HALL, KIM	21.66
10/21/2021	Apple.Com/Bill, 866-712-7753, CA, 95014, US	THOMPSON, KELLY	0.99
10/21/2021	Pick N Save #406, Schofield, WI, 54476, US	RAVEY, TRACY	34.43
10/21/2021	Environmental Informat, 3019614999, MD, 20815, US	JABLONSKI, JASON	65.00
10/21/2021	Amzn Mktp US 2y0en6lc2, Amzn.Com/Bill, WA, 98109, US	RAVEY, TRACY	76.58
10/21/2021	Fastenal Company 01wis, 507-453-8920, WI, 54476, US	SUCHOMSKI, JOHN	78.92
10/21/2021	Pick N Save #406, Schofield, WI, 54476, US	STROIK, MIRANDA	208.95
10/21/2021	Beccas Cafe, Weston, WI, 54476, US	SPETS, MATT	265.00
10/21/2021	Pick N Save 5406, 866-611-1979, WI, 54476, US	STROIK, MIRANDA	344.98
10/21/2021	Gum.Co/Cc Duachaka He, 6502043486, CA, 94103, US	JABLONSKI, JAMIE A	8.22
10/21/2021	Amzn Mktp US 2y2042hp1, Amzn.Com/Bill, WA, 98109, US	MULL, AARON	16.45
10/21/2021	Pick N Save #406, Schofield, WI, 54476, US	MULLALEY, JESSICA	17.10
10/21/2021	Sp Online Store, Sacramento, CA, 95829, US	JABLONSKI, JAMIE A	21.00
10/21/2021	Sp Lulu Press, Morrisville, NC, 27560, US	JABLONSKI, JAMIE A	24.20
10/21/2021	Hobby-Lobby #516, Wausau, WI, 54401, US	JAKUBEK, JACQUE	101.40
10/21/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	JAKUBEK, JACQUE	183.12
10/22/2021	Tst Gorski S Pub And, Mosinee, WI, 54455, US	HALL, KIM	12.00
10/22/2021	Hilton Dc F&b, Washington, DC, 20024, US	NYE, CASEY	13.37
10/22/2021	Beccas Cafe, 715-432-9324, WI, 54476, US	SEEHAFER, DAWN	150.45
10/22/2021	Target.Com, 800-591-3869, MN, 55445, US	LINDELL, JEFF	8.49
10/22/2021	Uber Trip, 8005928996, CA, 94105, US	NYE, CASEY	11.65
10/22/2021	Usps Po 5674400919, Schofield, WI, 54476, US	SUCKOW, ELLEN	17.40
10/22/2021	Target.Com, 800-591-3869, MN, 55445, US	LINDELL, JEFF	20.00
10/22/2021	Fastenal Company 01wis, 507-453-8920, WI, 54476, US	SUCHOMSKI, JOHN	28.65
10/22/2021	Olive Garden 0021864, Wausau, WI, 54401, US	RAVEY, TRACY	142.04
10/22/2021	Target.Com, 800-591-3869, MN, 55445, US	LINDELL, JEFF	474.47
10/22/2021	Bulk Bookstore, 5038678738, OR, 97201, US	DALEY, MICHELLE	1,240.00

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10/22/2021	Harbor Freight Tools 2, Rothschild, WI, 54474, US	HOFFMAN, AARON	1,335.93
10/22/2021	Target.Com, 800-591-3869, MN, 55445, US	ZYNDA, JENNIFER	15.98
10/22/2021	Hobby-Lobby #516, Wausau, WI, 54401, US	JAKUBEK, JACQUE	74.15
10/25/2021	Appleton Int Airporqps, Appleton, WI, 54914, US	NYE, CASEY	3.00
10/25/2021	Uber Trip, 8005928996, CA, 94105, US	NYE, CASEY	5.54
10/25/2021	Uber Trip, 8005928996, CA, 94105, US	NYE, CASEY	9.75
10/25/2021	Target.Com, 800-591-3869, MN, 55445, US	LINDELL, JEFF	20.00
10/25/2021	Hilton Dc F&b, Washington, DC, 20024, US	NYE, CASEY	20.90
10/25/2021	Fastenal Company 01wis, 507-453-8920, WI, 54476, US	HERNING, CODY	24.42
10/25/2021	Central Wisconsin Airp, Mosinee, WI, 54455, US	NYE, CASEY	32.00
10/25/2021	Uber Trip, 8005928996, CA, 94105, US	NYE, CASEY	36.99
10/25/2021	Pick N Save 5406, 866-611-1979, WI, 54476, US	MEYER, MELISSA	98.85
10/25/2021	Mastergraphics, Customerservi, WI, 53719, US	FRISCH, TAMMY	150.15
10/25/2021	Sams Club #6535, Wausau, WI, 54401, US	MCFARLANE, JASON	182.34
10/25/2021	Holiday Inn, 9206826000, WI, 54220, US	FRISCH, TAMMY	218.00
10/25/2021	Holiday Inn, 9206826000, WI, 54220, US	FRISCH, TAMMY	218.00
10/25/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	MEYER, MELISSA	242.42
10/25/2021	Rscool Today, 6122843967, FL, 33609, US	SEKEL, JAMES	375.00
10/25/2021	Hilton Wash Dc Natl Ma, Washington, DC, 20024, US	NYE, CASEY	892.20
10/25/2021	Joann Stores #1585, Wausau, WI, 54401, US	JAKUBEK, JACQUE	29.76
10/25/2021	Decker Equipment, 800-7624899, MI, 48768, US	MULL, AARON	52.45
10/25/2021	Fabick Cat 9, 715-3596220, WI, 54476-4779, US	SUCHOMSKI, JOHN	125.77
10/25/2021	Hobby Lobby Ecomm, 405-745-1100, OK, 73179, US	JAKUBEK, JACQUE	140.45
10/25/2021	Walmart.Com Aa, 8009666546, AR, 72716, US	JAKUBEK, JACQUE	148.54
10/25/2021	Eb The Scerts Model-D, 8014137200, CA, 94105, US	JABLONSKI, JAMIE A	413.94
10/25/2021	Menards Wausau Wi, 800-000-0000, WI, 54401, US	JABLONSKI, JAMIE A	461.35
10/26/2021	Ntlrest Servsafe, Chicago, IL, 60606, US	BAUDHUIN, LATICIA	983.26
10/26/2021	Samsclub #6535, Wausau, WI, 54401, US	MCFARLANE, JASON	-88.14
10/26/2021	Dollar Tree, Schofield, WI, 54476, US	STROIK, MIRANDA	25.00
10/26/2021	Weston Hardware, Weston, WI, 54476, US	SUCHOMSKI, JOHN	33.55
10/26/2021	Pick N Save #406, Schofield, WI, 54476, US	STROIK, MIRANDA	48.70
10/26/2021	Buildersfirstsource637, 7158422001, WI, 54401, US	PERNSTEINER, CHAD	95.66
10/26/2021	The Week Magazine, 877-245-8151, NY, 10018, US	DALEY, MICHELLE	129.00
10/26/2021	Harbor Freight Tools 2, Rothschild, WI, 54474, US	SUCHOMSKI, JOHN	23.98
10/26/2021	Pick N Save #404, Rothschild, WI, 54474, US	MULLALEY, JESSICA	33.72
10/26/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	MULLALEY, JESSICA	69.51
10/26/2021	Officemax/Depot 6367, Wausau, WI, 54401, US	MULLALEY, JESSICA	116.44
10/27/2021	Weston Hardware, Weston, WI, 54476, US	HOFFMAN, AARON	27.17
10/27/2021	Carquest 2345, Schofield, WI, 54476, US	SUCHOMSKI, JOHN	50.32
10/27/2021	Airgas Usa, Llc, 866-935-3370, OH, 44131, US	FRISCH, TAMMY	78.00
10/27/2021	Pick N Save 5406, 866-611-1979, WI, 54476, US	STROIK, MIRANDA	156.15
10/27/2021	Amzn Mktp US Ey0nx5ao3, Amzn.Com/Bill, WA, 98109, US	JAKUBEK, JACQUE	18.54
10/27/2021	Dominos 2042, 208-877-4992, WI, 54476, US	JAKUBEK, JACQUE	61.30
10/27/2021	Pick N Save #406, Schofield, WI, 54476, US	MULLALEY, JESSICA	61.68
10/27/2021	Dpi Educator Licensing, 608-2669616, WI, 53703, US	JABLONSKI, JAMIE A	100.00
10/27/2021	Dpi Educator Licensing, 608-2669616, WI, 53703, US	JABLONSKI, JAMIE A	100.00
10/27/2021	Autism Greater Wi, 9205584602, WI, 54952, US	JABLONSKI, JAMIE A	170.00
10/27/2021	Samsclub #6535, Wausau, WI, 54401, US	JABLONSKI, JAMIE A	195.36
10/28/2021	Pick N Save #406, Schofield, WI, 54476, US	SEEHAFER, DAWN	22.41
10/28/2021	Pick N Save #404, Rothschild, WI, 54474, US	SEEHAFER, DAWN	37.93

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Tran Date	Where Used	District Card Name	Amount
10/28/2021	Issuu, 8444778800, CA, 94301, US	RAVEY, TRACY	-315.00
10/28/2021	Equinenetwork Magazine, 800-5782607, CO, 80301, US	FRISCH, TAMMY	18.00
10/28/2021	Pick N Save #406, Schofield, WI, 54476, US	MCFARLANE, JASON	29.96
10/28/2021	Kwik Trip 35600003566, Weston, WI, 54476-0000, US	JABLONSKI, JASON	83.98
10/28/2021	Menards Wausau Wi, Wausau, WI, 54401, US	SUCHOMSKI, JOHN	123.07
10/28/2021	Saxon Uniform Network, 412-2733496, PA, 15104-1941, US	FRISCH, TAMMY	152.50
10/28/2021	Arbys 5279, Schofield, WI, 54476, US	MCFARLANE, JASON	218.74
10/28/2021	Greenheck Fan Corp, 7153556171, WI, 54476, US	JABLONSKI, JASON	280.62
10/28/2021	Cdw Govt #m740413, 800-808-4239, IL, 60061, US	RAVEY, TRACY	900.00
10/28/2021	Officemax/Depot 6367, Wausau, WI, 54401, US	JABLONSKI, JAMIE A	7.37
10/28/2021	Target 00003640, Schofield, WI, 54476, US	ZYNDA, JENNIFER	8.67
10/28/2021	Henry Vilas Zoo, Madison, WI, 53715, US	GOETSCH, DIANE	30.00
10/28/2021	Henry Vilas Zoo, Madison, WI, 53715, US	GOETSCH, DIANE	30.00
10/28/2021	Samsclub #6535, Wausau, WI, 54401, US	JABLONSKI, JAMIE A	41.88
10/29/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	SEKEL, JAMES	-109.00
10/29/2021	Pick N Save #406, Schofield, WI, 54476, US	SEEHAFER, DAWN	10.06
10/29/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	WEGGE, KAREN A	109.00
10/29/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	WEGGE, KAREN A	218.00
10/29/2021	Bulk Bookstore, 5038678738, OR, 97201, US	SEEHAFER, DAWN	451.00
10/29/2021	Fastenal Company 01wis, 507-453-8920, WI, 54476, US	RAVEY, TRACY	2.24
10/29/2021	Fastenal Company 01wis, 507-453-8920, WI, 54476, US	SUCHOMSKI, JOHN	7.63
10/29/2021	Trigs, Schofield, WI, 54476, US	JABLONSKI, JASON	44.06
10/29/2021	The Home Depot #4931, Wausau, WI, 544010000, US	RAVEY, TRACY	114.81
10/29/2021	Joann Stores #1585, Wausau, WI, 54401, US	STROIK, MIRANDA	132.44
10/29/2021	Pro World, 8564061020, NJ, 08110, US	DALEY, MICHELLE	315.45
10/29/2021	Otter.Ai, Mountain View, CA, 94040, US	JABLONSKI, JAMIE A	-99.99
11/01/2021	Patron Mexican Restaur, Weston, WI, 54476-2779, US	HALL, KIM	56.36
11/01/2021	Samsclub #6535, Wausau, WI, 54401, US	SEEHAFER, DAWN	58.84
11/01/2021	Greenheck Fan Corp, 7153556171, WI, 54476, US	JABLONSKI, JASON	-280.62
11/01/2021	Weston Hardware, Weston, WI, 54476, US	SUCHOMSKI, JOHN	8.59
11/01/2021	Politos Pizza, Rothschild, WI, 54474, US	JABLONSKI, JASON	90.00
11/01/2021	Bath And Body Works 56, Wausau, WI, 54401, US	JAKUBEK, JACQUE	97.60
11/01/2021	Pick N Save 5406, 866-611-1979, WI, 54476, US	STROIK, MIRANDA	189.59
11/01/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	LINDELL, JEFF	238.00
11/01/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	LINDELL, JEFF	238.00
11/01/2021	Kalahari Resort - Wi, Wisconsin Del, WI, 53965, US	LINDELL, JEFF	238.00
11/01/2021	Greenheck Fan Corp, 7153556171, WI, 54476, US	JABLONSKI, JASON	265.99
11/01/2021	Dbc Blick Art Material, 800-447-1892, IL, 61401, US	DALEY, MICHELLE	763.65
11/01/2021	Kwik Trip 78700007872, Weston, WI, 54476, US	MULLALEY, JESSICA	5.16
11/01/2021	Kwik Trip 78700007872, Weston, WI, 54476, US	MULLALEY, JESSICA	6.45
11/01/2021	Pick N Save #406, Schofield, WI, 54476, US	MULLALEY, JESSICA	50.59
11/01/2021	Samsclub.Com, 888-746-7726, AR, 72712, US	MULLALEY, JESSICA	106.84
			51,700.39

Fd T Loc		Obj Func		Prj DeptJob		Fd T Loc Obj Fu		Account Level	Beginning	2021-22		Ending	
								Description	Balance	FYTD Debits	FYTD Credits	Balance	
10	A	000	000	711000	000	000	000	GENERAL FUND/CL	Cash	-3,399,062.23	44,301,415.10	39,781,018.16	1,121,334.71
10	A	000	000	711100	000	000	000	GENERAL FUND/PA	Payroll Cash Clearance Account	0.00	14,014,077.98	14,014,077.98	0.00
10	A	000	000	711105	000	000	000	GENERAL FUND/A/	A/P ACH Cash Clearing Account	0.00	0.00	0.00	0.00
10	A	000	000	711200	000	000	000	GENERAL FUND/PE	PETTY CASH	980.00	0.00	0.00	980.00
10	A	000	000	712000	000	000	000	GENERAL FUND/IN	INVESTMENTS	15,912,308.09	25,337,155.15	40,101,488.24	1,147,975.00
10	A	000	000	712999	000	000	000	GENERAL FUND/WI	WISC INVESTMENT ACCOUNT, PMA	500,045.52	39.09	500,000.00	84.61
10	A	000	000	713100	000	000	000	GENERAL FUND/TA	TAXES RECEIVABLE	7,071,831.85	16,625,205.00	7,071,831.85	16,625,205.00
10	A	000	000	713200	000	000	000	GENERAL FUND/AC	ACCOUNTS RECEIVABLE	1,116.83	0.00	1,116.83	0.00
10	A	000	000	713207	000	000	000	GENERAL FUND/SC	SCOREBOARDS RECEIVABLE	0.00	0.00	0.00	0.00
10	A	000	000	713210	000	000	000	GENERAL FUND/TR	TRACK RENOVATION PROJECT	0.00	0.00	0.00	0.00
10	A	000	000	714100	000	000	000	GENERAL FUND/DU	Due From Other Funds	0.00	0.00	0.00	0.00
10	A	000	000	715100	000	000	000	GENERAL FUND/DU	DUE FROM LOCAL GOVERNMENTS	0.00	0.00	0.00	0.00
10	A	000	000	715200	000	000	000	GENERAL FUND/OT	OTHER WI DISTRICTS	17,171.88	0.00	17,171.88	0.00
10	A	000	000	715500	000	000	000	GENERAL FUND/DU	DUE FROM STATE GOVERNMENT	840,285.27	0.00	840,285.27	0.00
10	A	000	000	715600	000	000	000	GENERAL FUND/DU	DUE FROM FED GOVERNMENT	1,188,267.12	0.00	1,102,897.24	85,369.88
10	A	000	000	716000	000	000	000	GENERAL FUND/IN	INVENTORY	53,684.08	0.00	53,684.08	0.00
10	A	000	000	717000	000	000	000	GENERAL FUND/PR	PREPAID EXPENSE	161,953.85	8,035.51	111,281.60	58,707.76
10	A	000	000	717001	000	000	000	GENERAL FUND/PR	PREPAID EXPENSE	0.00	0.00	0.00	0.00
10	A	000	000	751000	000	000	000	GENERAL FUND/FI	FIXED ASSETS-SITES	0.00	0.00	0.00	0.00
10	A	000	000	753000	000	000	000	GENERAL FUND/FI	FIXED ASSETS-BUILDINGS	0.00	0.00	0.00	0.00
10	A	000	000	754000	000	000	000	GENERAL FUND/FI	FIXED ASSETS-EQUIPMENT	0.00	0.00	0.00	0.00
10	A	000	000	754100	000	000	000	GENERAL FUND/EQ	FIXED ASSETS-ACCUM DEPRECIATN	0.00	0.00	0.00	0.00
10	L	000	000	000000	000	000	000	GENERAL FUND/N/		0.00	0.00	0.00	0.00
10	L	000	000	811100	000	000	000	GENERAL FUND/TE	TEMPORARY NOTES PAYABLE	0.00	0.00	0.00	0.00
10	L	000	000	811200	000	000	000	GENERAL FUND/AC	ACCOUNTS PAYABLE	-820,391.69	9,024,627.22	8,204,530.53	-295.00
10	L	000	000	811555	000	000	000	GENERAL FUND/AP	AP P-CARD	0.00	0.00	0.00	0.00
10	L	000	000	811558	000	000	000	GENERAL FUND/AP	AP STAPLES	0.00	0.00	0.00	0.00
10	L	000	000	811610	000	000	000	GENERAL FUND/ME	MEDICARE TAX	-53,654.16	565,327.74	511,673.58	0.00
10	L	000	000	811611	000	000	000	GENERAL FUND/FI	SOCIAL SECURITY TAX	-229,415.26	2,412,460.66	2,183,045.40	0.00
10	L	000	000	811612	000	000	000	GENERAL FUND/FE	FEDERAL INCOME TAX	0.00	1,291,299.76	1,291,299.76	0.00
10	L	000	000	811613	000	000	000	GENERAL FUND/ST	STATE INCOME TAX	-84,371.23	828,537.57	744,166.34	0.00
10	L	000	000	811620	000	000	000	GENERAL FUND/RE	RETIREMENT DEDUCTION	-718,512.05	2,237,026.77	2,211,986.84	-693,472.12
10	L	000	000	811622	000	000	000	GENERAL FUND/HD	HDHP - 4K / 8K	0.00	0.00	0.00	0.00
10	L	000	000	811624	000	000	000	GENERAL FUND/HD	HDHP - 40 PLAN	0.00	0.00	0.00	0.00
10	L	000	000	811626	000	000	000	GENERAL FUND/HS	HSA - EMPLOYEE DEDUCTIONS	0.00	0.00	0.00	0.00
10	L	000	000	811628	000	000	000	GENERAL FUND/HS	HSA - EMPLOYER CONTRIBUTIONS	0.00	0.00	0.00	0.00
10	L	000	000	811630	000	000	000	GENERAL FUND/DE	DENTAL - PPO CONTRIBUTIONS	0.00	0.00	0.00	0.00
10	L	000	000	811631	000	000	000	GENERAL FUND/HE	HEALTH INSURANCE DEDUCT	0.00	0.00	0.00	0.00
10	L	000	000	811632	000	000	000	GENERAL FUND/DE	DENTAL INSURANCE DEDUCT	0.00	0.00	0.00	0.00
10	L	000	000	811633	000	000	000	GENERAL FUND/DI	DISABILITY INS DEDUCTION	-10,241.42	58,566.58	52,346.32	-4,021.16

Fd T Loc		Obj Func		Prj DeptJob		Account Level		Beginning	2021-22	2021-22	Ending		
Fd T Loc		Obj Func		Prj DeptJob		Description		Balance	FYTD Debits	FYTD Credits	Balance		
10	L	000	000	811634	000	000	000	GENERAL FUND/SP	SPOUSE/DEP'T LIFE INSURANCE	-1,997.45	4,147.28	4,517.57	-2,367.74
10	L	000	000	811635	000	000	000	GENERAL FUND/DE	DEPENDENT CARE - CHPT125	-1,817.99	36,022.53	54,297.88	-20,093.34
10	L	000	000	811636	000	000	000	GENERAL FUND/DE	DENTAL-PPO CHAPTER 125	0.00	0.00	0.00	0.00
10	L	000	000	811637	000	000	000	GENERAL FUND/HE	HEALTH-CHAPTER 125	0.00	0.00	0.00	0.00
10	L	000	000	811638	000	000	000	GENERAL FUND/DE	DENTAL-CHAPTER 125	0.00	0.00	0.00	0.00
10	L	000	000	811639	000	000	000	GENERAL FUND/AD	ADDITIONAL LIFE INSURANCE	-877.43	33,352.88	37,260.86	-4,785.41
10	L	000	000	811640	000	000	000	GENERAL FUND/UN	UNITED WAY	0.00	7,179.42	7,179.42	0.00
10	L	000	000	811641	000	000	000	GENERAL FUND/OT	OTHER MEDICAL - CHPT 125	0.00	0.00	0.00	0.00
10	L	000	000	811642	000	000	000	GENERAL FUND/EB	EBC - FLEX CLAIMS TAIL	0.00	0.00	0.00	0.00
10	L	000	000	811643	000	000	000	GENERAL FUND/HE	HEALTH INS. - SELF PAY - COBRA	0.00	4,061.24	60,932.16	-56,870.92
10	L	000	000	811644	000	000	000	GENERAL FUND/DE	DENTAL INS. - SELF PAY - COBRA	0.00	333.76	6,077.26	-5,743.50
10	L	000	000	811645	000	000	000	GENERAL FUND/LI	LIFE INS - EMPLOYER CONTRIBUTI	-20,417.77	39,296.17	36,564.65	-17,686.25
10	L	000	000	811647	000	000	000	GENERAL FUND/LI	LIMITED FLEX PLAN-CHAPTER 125	-1,371.07	0.00	0.00	-1,371.07
10	L	000	000	811648	000	000	000	GENERAL FUND/SU	SUPPLEMENTAL LIFE INSURANCE	-2,878.89	15,805.15	17,922.08	-4,995.82
10	L	000	000	811650	000	000	000	GENERAL FUND/UN	UNION DUES DEDUCTION	0.00	0.00	0.00	0.00
10	L	000	000	811652	000	000	000	GENERAL FUND/GR	GREENHECK FIELDHOUSE MEMBERSHP	0.00	130.25	130.25	0.00
10	L	000	000	811655	000	000	000	GENERAL FUND/V	V VISION PLAN (DELTA)	63.14	17,908.25	15,392.52	2,578.87
10	L	000	000	811656	000	000	000	GENERAL FUND/V	V SHORT TERM DISABILITY	7,478.79	25,229.76	27,315.32	5,393.23
10	L	000	000	811665	000	000	000	GENERAL FUND/RO	ROTH 403(B)	0.00	34,940.62	34,940.62	0.00
10	L	000	000	811670	000	000	000	GENERAL FUND/TS	TSA'S	0.00	397,887.56	397,987.56	-100.00
10	L	000	000	811673	000	000	000	GENERAL FUND/RE	RETIREE HEALTH	0.00	0.00	4,357.26	-4,357.26
10	L	000	000	811674	000	000	000	GENERAL FUND/RE	RETIREE DENTAL	0.00	0.00	0.00	0.00
10	L	000	000	811675	000	000	000	GENERAL FUND/RE	RETIREE LIFE	0.00	0.00	0.00	0.00
10	L	000	000	811697	000	000	000	GENERAL FUND/CH	CHAMBER GIFT CERTIFICATES	0.00	6,389.97	6,389.97	0.00
10	L	000	000	811699	000	000	000	GENERAL FUND/MI	MISCELLANEOUS DEDUCTION	0.00	21,867.71	21,867.71	0.00
10	L	000	000	811700	000	000	000	GENERAL FUND/IN	INTEREST PAYABLE	0.00	0.00	0.00	0.00
10	L	000	000	811810	000	000	000	GENERAL FUND/NE	NET PAYROLL PAYABLE (CHECKS)	0.00	0.00	0.00	0.00
10	L	000	000	811815	000	000	000	GENERAL FUND/NE	NET EFT PAYABLE	0.00	29,930,085.26	29,930,085.26	0.00
10	L	000	000	811820	000	000	000	GENERAL FUND/VO	VOUCHERS PAYABLE	-3,719,974.79	3,719,974.79	0.00	0.00
10	L	000	000	812000	000	000	000	GENERAL FUND/DU	Due To Other Funds	-4,051,105.45	4,357,259.52	306,154.07	0.00
10	L	000	000	815100	000	000	000	GENERAL FUND/SE	SELF FUNDED PREMIUM DEPOSITS	0.00	0.00	0.00	0.00
10	L	000	000	815901	000	000	000	GENERAL FUND/OP	OPEB 73	0.00	0.00	745,801.00	-745,801.00
10	L	000	000	816000	000	000	000	GENERAL FUND/DE	DEFERRED REVENUES	0.00	0.00	0.00	0.00
10	L	000	000	816200	000	000	000	GENERAL FUND/DE	DEFERRED REVENUE STATE AID	0.00	0.00	0.00	0.00
10	L	000	000	816903	000	000	000	GENERAL FUND/DE	DEFERRED REVENUE-VARIOUS CAMPS	0.00	0.00	0.00	0.00
10	L	000	000	816905	000	000	000	GENERAL FUND/DE	DEFERRED REVENUE-MISC. ICE USE	0.00	0.00	0.00	0.00
10	L	000	000	816909	000	000	000	GENERAL FUND/DE	DEFERRED REVENUE H.S. HOCKEY	0.00	0.00	0.00	0.00
10	L	000	000	816910	000	000	000	GENERAL FUND/DE	DEF. REV. - IN TECH	0.00	0.00	0.00	0.00
10	L	000	000	816999	000	000	000	GENERAL FUND/OT	DEFERRED REVENUE- OTHER GRANTS	0.00	0.00	0.00	0.00
10	L	000	000	817100	000	000	000	GENERAL FUND/HE	HEALTH-CLAIMS PAYABLE	0.00	0.00	0.00	0.00

Account Level		Beginning	2021-22	2021-22	Ending
Fd T Loc Obj Func Prj DeptJob	Fd T Loc Obj Fu Description	Balance	FYTD Debits	FYTD Credits	Balance
10 L 000 000 817101 000 000 000	GENERAL FUND/SE SECURITY PREMIUM PAYABLE	-1,246,116.08	4,685,871.19	4,105,102.55	-665,347.44
10 L 000 000 817150 000 000 000	GENERAL FUND/HR HRA PAYABLE	0.00	0.00	0.00	0.00
10 L 000 000 817200 000 000 000	GENERAL FUND/DE DENTAL-CLAIMS PAYABLE	-55,000.00	395,067.55	398,241.78	-58,174.23
10 L 000 000 819107 000 000 000	GENERAL FUND/CO CONF ROOM A - ED IMPROVEMENT	0.00	0.00	0.00	0.00
10 L 000 000 842300 000 000 000	GENERAL FUND/LO LONG TERM BONDS PAYABLE	0.00	0.00	0.00	0.00
10 L 000 000 842350 000 000 000	GENERAL FUND/38 38 FUND TAXABLE BONDS	0.00	0.00	0.00	0.00
10 Q 000 000 000000 000 000 000	GENERAL FUND/N/	0.00	0.00	0.00	0.00
10 Q 000 000 911000 000 000 000	GENERAL FUND/FI FIXED ASSETS - L.T.D.	0.00	0.00	0.00	0.00
10 Q 000 000 912000 000 000 000	GENERAL FUND/FI FIXED ASSETS - TAX LEVY	0.00	0.00	0.00	0.00
10 Q 000 000 914000 000 000 000	GENERAL FUND/FI FIXED ASSETS-ACCUM DEPRECIATIO	0.00	0.00	0.00	0.00
10 Q 000 000 916000 000 000 000	GENERAL FUND/FI FIXED ASSETS - DONATIONS	0.00	0.00	0.00	0.00
10 Q 000 000 931000 000 000 000	GENERAL FUND/FU FUND BALANCE-RESERVED	0.00	1,479,189.92	1,804,242.89	-325,052.97
10 Q 000 000 931700 000 000 000	GENERAL FUND/FU FUND BALANCE - L.T.D.	0.00	0.00	0.00	0.00
10 Q 000 000 932000 000 000 000	GENERAL FUND/FU FUND BALANCE - CASH FLOW	0.00	0.00	0.00	0.00
10 Q 000 000 936120 000 000 000	GENERAL FUND/Co CONT OBLIG-RESTRICTED FUND BAL	0.00	0.00	0.00	0.00
10 Q 000 000 936130 000 000 000	GENERAL FUND/UN UNSPENT COMMON SCHOOL LIBRARY	-12,490.23	291,883.88	142,149.07	137,244.58
10 Q 000 000 936320 000 000 000	GENERAL FUND/De DEBT SERVICE RETIREMENT	0.00	0.00	0.00	0.00
10 Q 000 000 936500 000 000 000	GENERAL FUND/Fo FOOD SERVICE FUND BALANCE	0.00	0.00	0.00	0.00
10 Q 000 000 936900 000 000 000	GENERAL FUND/FD FUND BALANCE-RESTRICTED OTHER	0.00	0.00	0.00	0.00
10 Q 000 000 938900 000 000 000	GENERAL FUND/As ASSIGNED FUND BALANCE	0.00	0.00	0.00	0.00
10 Q 000 000 939200 000 000 000	GENERAL FUND/CA WORKING CAPITAL (CASH FLOW)	-11,325,491.23	26,288,140.96	31,536,988.14	-16,574,338.41
10 Q 000 000 939900 000 000 000	GENERAL FUND/Un UNASSIGNED FUND BALANCE	0.00	0.00	0.00	0.00
10 - - - - -		0.00	188,495,799.75	188,495,799.75	0.00

Fd T Loc		Obj Func		Prj DeptJob		Fd T Loc Obj Fu		Account Level	Description	Beginning	2021-22		Ending
										Balance	FYTD Debits	FYTD Credits	Balance
27	A	000	000	711000	000	000	000	SPECIAL EDUCATI	CASH	470,334.87	682,038.62	4,008,032.59	-2,855,659.10
27	A	000	000	711100	000	000	000	SPECIAL EDUCATI	PAYROLL CLEARANCE ACCOUNT	0.00	3,865,662.70	3,865,662.70	0.00
27	A	000	000	711105	000	000	000	SPECIAL EDUCATI	A/P ACH CASH ACCOUNT INTERCITY	0.00	0.00	0.00	0.00
27	A	000	000	712000	000	000	000	SPECIAL EDUCATI	INVESTMENTS	0.00	613,384.56	613,384.56	0.00
27	A	000	000	713200	000	000	000	SPECIAL EDUCATI	ACCOUNTS RECEIVABLE	0.00	0.00	0.00	0.00
27	A	000	000	714100	000	000	000	SPECIAL EDUCATI	Due From Other Funds	0.00	0.00	0.00	0.00
27	A	000	000	715420	000	000	000	SPECIAL EDUCATI	DUE FROM CESA	0.00	0.00	0.00	0.00
27	A	000	000	715500	000	000	000	SPECIAL EDUCATI	DUE FROM STATE GOVERNMENT	0.00	0.00	0.00	0.00
27	A	000	000	715600	000	000	000	SPECIAL EDUCATI	DUE FROM FED GOVERNMENT	622,138.11	39,972.99	662,111.10	0.00
27	L	000	000	000000	000	000	000	SPECIAL EDUCATI		0.00	0.00	0.00	0.00
27	L	000	000	811200	000	000	000	SPECIAL EDUCATI	ACCOUNTS PAYABLE	-57,645.69	350,009.46	292,363.77	0.00
27	L	000	000	811558	000	000	000	SPECIAL EDUCATI	AP STAPLES	0.00	0.00	0.00	0.00
27	L	000	000	811610	000	000	000	SPECIAL EDUCATI	MEDICARE TAX	-10,147.07	10,147.07	0.00	0.00
27	L	000	000	811611	000	000	000	SPECIAL EDUCATI	SOCIAL SECURITY TAX	-43,387.32	43,387.32	0.00	0.00
27	L	000	000	811620	000	000	000	SPECIAL EDUCATI	RETIREMENT DEDUCTION	-47,919.71	47,919.71	0.00	0.00
27	L	000	000	811628	000	000	000	SPECIAL EDUCATI	HSA - EMPLOYER CONTRIBUTIONS	0.00	0.00	0.00	0.00
27	L	000	000	811630	000	000	000	SPECIAL EDUCATI	DENTAL - PPO CONTRIBUTION	0.00	0.00	0.00	0.00
27	L	000	000	811633	000	000	000	SPECIAL EDUCATI	DISABILITY INS DEDUCTION	-2,387.45	2,387.45	0.00	0.00
27	L	000	000	811645	000	000	000	SPECIAL EDUCATI	LIFE INS - EMPLOYER CONTRIBUTI	-1,171.37	1,171.37	0.00	0.00
27	L	000	000	811815	000	000	000	SPECIAL EDUCATI	NET EFT PAYABLE	0.00	5,840,924.45	5,840,924.45	0.00
27	L	000	000	811820	000	000	000	SPECIAL EDUCATI	VOUCHERS PAYABLE	-709,923.96	709,923.96	0.00	0.00
27	L	000	000	812000	000	000	000	SPECIAL EDUCATI	Due To Other Funds	0.00	0.00	0.00	0.00
27	L	000	000	815100	000	000	000	SPECIAL EDUCATI	SELF FUNDED PREMIUM DEPOSITS	0.00	0.00	0.00	0.00
27	L	000	000	817101	000	000	000	SPECIAL EDUCATI	SECURITY PREMIUM PAYABLE	-202,754.97	202,754.97	0.00	0.00
27	L	000	000	817150	000	000	000	SPECIAL EDUCATI	HRA PAYABLE	0.00	0.00	0.00	0.00
27	L	000	000	817200	000	000	000	SPECIAL EDUCATI	DENTAL - CLAIMS PAYABLE	-17,135.44	17,135.44	0.00	0.00
27	Q	000	000	000000	000	000	000	SPECIAL EDUCATI		0.00	0.00	0.00	0.00
27	Q	000	000	931000	000	000	000	SPECIAL EDUCATI	FUND BALANCE - RESERVED	0.00	128,386.28	212,741.67	-84,355.39
27	Q	000	000	932000	000	000	000	SPECIAL EDUCATI	FUND BALANCE - CASH FLOW	0.00	0.00	0.00	0.00
27	Q	000	000	936120	000	000	000	SPECIAL EDUCATI	CONT OBLIG-RESTRICTED FUND BAL	0.00	0.00	0.00	0.00
27	Q	000	000	936320	000	000	000	SPECIAL EDUCATI	DEBT SERVICE RETIREMENT	0.00	0.00	0.00	0.00
27	Q	000	000	936500	000	000	000	SPECIAL EDUCATI	FOOD SERVICE FUND BALANCE	0.00	0.00	0.00	0.00
27	Q	000	000	936900	000	000	000	SPECIAL EDUCATI	FUND BALANCE-RESTRICTED OTHER	0.00	0.00	0.00	0.00
27	Q	000	000	938900	000	000	000	SPECIAL EDUCATI	ASSIGNED FUND BALANCE	0.00	0.00	0.00	0.00
27	Q	000	000	939200	000	000	000	SPECIAL EDUCATI	WORKING CAPITAL (CASH FLOW)	0.00	0.00	0.00	0.00
27	Q	000	000	939900	000	000	000	SPECIAL EDUCATI	UNASSIGNED FUND BALANCE	0.00	4,441,890.92	1,501,876.43	2,940,014.49
27	-	-	-	-	-	-	-	-	-	0.00	16,997,097.27	16,997,097.27	0.00

		Account Level		Beginning	2021-22	2021-22	Ending
Fd T Loc Obj Func Prj DeptJob	Fd T Loc Obj Fu	Description	Balance	FYTD Debits	FYTD Credits	Balance	
50 A 000 000 711000 000 000 000	FOOD SERVICE FU	CASH	1,655,206.81	684,813.05	895,902.21	1,444,117.65	
50 A 000 000 711100 000 000 000	FOOD SERVICE FU	PAYROLL CLEARANCE ACCOUNT	0.00	404,738.98	404,738.98	0.00	
50 A 000 000 711105 000 000 000	FOOD SERVICE FU	A/P ACH CASH ACCOUNT INTERCITY	0.00	0.00	0.00	0.00	
50 A 000 000 711200 000 000 000	FOOD SERVICE FU	PETTY CASH	93.00	0.00	0.00	93.00	
50 A 000 000 712000 000 000 000	FOOD SERVICE FU	INVESTMENTS	0.00	665,819.46	665,819.46	0.00	
50 A 000 000 713200 000 000 000	FOOD SERVICE FU	ACCOUNTS RECEIVABLE	81.75	0.00	81.75	0.00	
50 A 000 000 714100 000 000 000	FOOD SERVICE FU	Due From Other Funds	0.00	0.00	0.00	0.00	
50 A 000 000 715500 000 000 000	FOOD SERVICE FU	DUE FROM STATE GOVERNMENT	0.00	0.00	0.00	0.00	
50 A 000 000 715600 000 000 000	FOOD SERVICE FU	DUE FROM FEDERAL FUNDS	115,013.15	0.00	115,013.15	0.00	
50 L 000 000 000000 000 000 000	FOOD SERVICE FU		0.00	0.00	0.00	0.00	
50 L 000 000 811200 000 000 000	FOOD SERVICE FU	ACCOUNTS PAYABLE	-42,378.75	403,022.50	360,643.75	0.00	
50 L 000 000 811558 000 000 000	FOOD SERVICE FU	AP STAPLES	0.00	0.00	0.00	0.00	
50 L 000 000 811610 000 000 000	FOOD SERVICE FU	MEDICARE TAX	-316.52	316.52	0.00	0.00	
50 L 000 000 811611 000 000 000	FOOD SERVICE FU	SOCIAL SECURITY TAX	-1,353.46	1,353.46	0.00	0.00	
50 L 000 000 811620 000 000 000	FOOD SERVICE FU	RETIREMENT DEDUCTION	-1,465.73	1,465.73	0.00	0.00	
50 L 000 000 811630 000 000 000	FOOD SERVICE FU	DENTAL PPO PLAN	0.00	0.00	0.00	0.00	
50 L 000 000 811633 000 000 000	FOOD SERVICE FU	DISABILITY INS DEDUCTION	0.00	0.00	0.00	0.00	
50 L 000 000 811645 000 000 000	FOOD SERVICE FU	LIFE INS - EMPLOYER CONTRIBUTI	0.00	0.00	0.00	0.00	
50 L 000 000 811815 000 000 000	FOOD SERVICE FU	NET EFT PAYABLE	0.00	452,593.85	452,593.85	0.00	
50 L 000 000 811820 000 000 000	FOOD SERVICE FU	VOUCHERS PAYABLE	-22,359.58	22,359.58	0.00	0.00	
50 L 000 000 812000 000 000 000	FOOD SERVICE FU	Due To Other Funds	-85,920.82	85,920.82	0.00	0.00	
50 L 000 000 815000 000 000 000	FOOD SERVICE FU	DEPOSITS PAYABLE-FAMILY BALANC	0.00	0.00	0.00	0.00	
50 L 000 000 815100 000 000 000	FOOD SERVICE FU	SELF FUNDED PREMIUM DEPOSITS	0.00	0.00	0.00	0.00	
50 L 000 000 815300 000 000 000	FOOD SERVICE FU	DUE TO STATE	0.00	0.00	0.00	0.00	
50 L 000 000 815900 000 000 000	FOOD SERVICE FU	Other Deposits Payable	-122,382.86	0.00	0.00	-122,382.86	
50 L 000 000 817101 000 000 000	FOOD SERVICE FU	SECURITY PREMIUM PAYABLE	0.00	0.00	0.00	0.00	
50 L 000 000 817150 000 000 000	FOOD SERVICE FU	HRA PAYABLE	0.00	0.00	0.00	0.00	
50 L 000 000 817200 000 000 000	FOOD SERVICE FU	DENTAL-CLAIMS PAYABLE	0.00	0.00	0.00	0.00	
50 Q 000 000 000000 000 000 000	FOOD SERVICE FU		0.00	0.00	0.00	0.00	
50 Q 000 000 931000 000 000 000	FOOD SERVICE FU	FUND BALANCE - RESERVED	0.00	34,831.79	103,959.36	-69,127.57	
50 Q 000 000 932000 000 000 000	FOOD SERVICE FU	FUND BALANCE - CASH FLOW	0.00	0.00	0.00	0.00	
50 Q 000 000 936120 000 000 000	FOOD SERVICE FU	CONT OBLIG-RESTRICTED FUND BAL	0.00	0.00	0.00	0.00	
50 Q 000 000 936320 000 000 000	FOOD SERVICE FU	DEBT SERVICE RETIREMENT	0.00	0.00	0.00	0.00	
50 Q 000 000 936500 000 000 000	FOOD SERVICE FU	FOOD SERVICE FUND BALANCE	-1,494,216.99	877,630.01	636,113.24	-1,252,700.22	
50 Q 000 000 936900 000 000 000	FOOD SERVICE FU	FUND BALANCE-RESTRICTED OTHER	0.00	0.00	0.00	0.00	
50 Q 000 000 938900 000 000 000	FOOD SERVICE FU	ASSIGNED FUND BALANCE	0.00	0.00	0.00	0.00	
50 Q 000 000 939200 000 000 000	FOOD SERVICE FU	WORKING CAPITAL (CASH FLOW)	0.00	0.00	0.00	0.00	
50 Q 000 000 939900 000 000 000	FOOD SERVICE FU	UNASSIGNED FUND BALANCE	0.00	0.00	0.00	0.00	
50 - - - - -			0.00	3,634,865.75	3,634,865.75	0.00	

Fd T Loc		Obj Func		Prj DeptJob		Fd T Loc Obj Fu		Account Level	Beginning	2021-22		Ending
								Description	Balance	FYTD Debits	FYTD Credits	Balance
80	A	000	000	711000	000	000	000	COMMUNITY SERVI CASH	-58,335.57	832,257.49	866,766.02	-92,844.10
80	A	000	000	711001	000	000	000	COMMUNITY SERVI COMM. SERV. MINIMUM BALANCE RQ	250.00	0.00	0.00	250.00
80	A	000	000	711100	000	000	000	COMMUNITY SERVI PAYROLL CLEARANCE ACCOUNT	0.00	356,559.30	356,559.30	0.00
80	A	000	000	711105	000	000	000	COMMUNITY SERVI A/P ACH CASH ACCOUNT INTERCITY	0.00	0.00	0.00	0.00
80	A	000	000	711200	000	000	000	COMMUNITY SERVI PETTY CASH	1,030.00	0.00	0.00	1,030.00
80	A	000	000	711300	000	000	000	COMMUNITY SERVI HOLDING ACCOUNT - CASH	0.00	0.00	0.00	0.00
80	A	000	000	712000	000	000	000	COMMUNITY SERVI INVESTMENTS	0.00	0.00	0.00	0.00
80	A	000	000	713100	000	000	000	COMMUNITY SERVI TAXES RECEIVABLE	0.00	375,000.00	0.00	375,000.00
80	A	000	000	713200	000	000	000	COMMUNITY SERVI ACCOUNTS RECEIVABLE	115,684.79	0.00	115,684.79	0.00
80	A	000	000	713205	000	000	000	COMMUNITY SERVI RECEIVABLES - UNCOLLECTED GHF	11,538.90	0.00	11,253.90	285.00
80	A	000	000	714100	000	000	000	COMMUNITY SERVI Due From Other Funds	42,389.45	306,154.07	348,543.52	0.00
80	A	000	000	715600	000	000	000	COMMUNITY SERVI DUE FROM FEDERAL GOVERNMENT	1,804.40	0.00	1,804.40	0.00
80	L	000	000	000000	000	000	000	COMMUNITY SERVI	0.00	0.00	0.00	0.00
80	L	000	000	811200	000	000	000	COMMUNITY SERVI ACCOUNTS PAYABLE	-37,372.44	169,395.70	132,023.26	0.00
80	L	000	000	811225	000	000	000	COMMUNITY SERVI CMTY ED CK ACCT PAYABLE	0.00	0.00	0.00	0.00
80	L	000	000	811558	000	000	000	COMMUNITY SERVI AP STAPLES	0.00	0.00	0.00	0.00
80	L	000	000	811610	000	000	000	COMMUNITY SERVI MEDICARE TAX	-668.04	668.04	0.00	0.00
80	L	000	000	811611	000	000	000	COMMUNITY SERVI SOCIAL SECURITY TAX	-2,856.70	2,856.70	0.00	0.00
80	L	000	000	811620	000	000	000	COMMUNITY SERVI RETIREMENT DEDUCTION	-1,472.88	1,472.88	0.00	0.00
80	L	000	000	811628	000	000	000	COMMUNITY SERVI HSA - EMPLOYER CONTRIBUTIONS	0.00	0.00	0.00	0.00
80	L	000	000	811630	000	000	000	COMMUNITY SERVI DENTAL - PPO CONTRIBUTION	0.00	0.00	0.00	0.00
80	L	000	000	811633	000	000	000	COMMUNITY SERVI DISABILITY INSURANCE	0.00	0.00	0.00	0.00
80	L	000	000	811645	000	000	000	COMMUNITY SERVI LIFE INS - EMPLOYER CONTRIBUTI	0.00	0.00	0.00	0.00
80	L	000	000	811815	000	000	000	COMMUNITY SERVI NET EFT PAYABLE	0.00	453,805.40	453,805.40	0.00
80	L	000	000	811820	000	000	000	COMMUNITY SERVI VOUCHERS PAYABLE	-46,124.24	46,124.24	0.00	0.00
80	L	000	000	812000	000	000	000	COMMUNITY SERVI Due To Other Funds	0.00	0.00	0.00	0.00
80	L	000	000	816900	000	000	000	COMMUNITY SERVI DEFER.REV.-SCHL.AGE CARE	-1,320.00	1,320.00	0.00	0.00
80	L	000	000	816901	000	000	000	COMMUNITY SERVI DEFERRED REV.-YOUTH ACTIV.FEES	-21,630.82	21,630.82	0.00	0.00
80	L	000	000	816902	000	000	000	COMMUNITY SERVI DEFER.REV.-ADULT & FAMILY FEES	-1,039.20	1,039.20	0.00	0.00
80	L	000	000	816903	000	000	000	COMMUNITY SERVI DEFERRED REVENUE-VARIOUS CAMPS	-34,615.17	34,615.17	0.00	0.00
80	L	000	000	816904	000	000	000	COMMUNITY SERVI DEFERRED REVENUE PRESCHOOL FEE	0.00	0.00	0.00	0.00
80	L	000	000	816905	000	000	000	COMMUNITY SERVI DEFERRED REVENUE-OTHER ICE USE	-5,264.64	5,264.64	0.00	0.00
80	L	000	000	816906	000	000	000	COMMUNITY SERVI Deferred Revenue - Care Corner	0.00	0.00	0.00	0.00
80	L	000	000	816907	000	000	000	COMMUNITY SERVI DEFERRED REVENUE-POOL ACTIVITY	0.00	0.00	0.00	0.00
80	L	000	000	816908	000	000	000	COMMUNITY SERVI DEF.REV.-GFH BUILDING RENTAL	-2,355.50	2,355.50	0.00	0.00
80	L	000	000	816909	000	000	000	COMMUNITY SERVI DEF.REV.- H.S. HOCKEY	-900.00	900.00	0.00	0.00
80	L	000	000	816911	000	000	000	COMMUNITY SERVI DEF.REV.-MEMBERSHIPS	-3,411.38	3,411.38	0.00	0.00
80	L	000	000	816913	000	000	000	COMMUNITY SERVI DEFERRED REVENUE-GHF CONCESSIO	-2,799.38	2,799.38	0.00	0.00
80	L	000	000	817101	000	000	000	COMMUNITY SERVI SECURITY PREMIUM PAYABLE	0.00	0.00	0.00	0.00
80	L	000	000	817200	000	000	000	COMMUNITY SERVI DENTAL CLAIMS PAYABLE	0.00	0.00	0.00	0.00

Account Level		Beginning	2021-22	2021-22	Ending
Fd T Loc Obj Func Prj DeptJob	Fd T Loc Obj Fu Description	Balance	FYTD Debits	FYTD Credits	Balance
80 Q 000 000 000000 000 000 000	COMMUNITY SERVI	0.00	0.00	0.00	0.00
80 Q 000 000 931000 000 000 000	COMMUNITY SERVI FUND BALANCE - RESERVED	0.00	1,387.99	1,387.99	0.00
80 Q 000 000 931896 000 000 000	COMMUNITY SERVI TOURNAMENT ACTIVITY	0.00	0.00	0.00	0.00
80 Q 000 000 932000 000 000 000	COMMUNITY SERVI FUND BALANCE - CASH FLOW	0.00	0.00	0.00	0.00
80 Q 000 000 936120 000 000 000	COMMUNITY SERVI CONT OBLIG-RESTRICTED FUND BAL	0.00	0.00	0.00	0.00
80 Q 000 000 936320 000 000 000	COMMUNITY SERVI DEBT SERVICE RETIREMENT	0.00	0.00	0.00	0.00
80 Q 000 000 936500 000 000 000	COMMUNITY SERVI FOOD SERVICE FUND BALANCE	0.00	0.00	0.00	0.00
80 Q 000 000 936900 000 000 000	COMMUNITY SERVI FUND BALANCE-RESTRICTED OTHER	47,468.42	524,977.50	856,166.82	-283,720.90
80 Q 000 000 938900 000 000 000	COMMUNITY SERVI ASSIGNED FUND BALANCE	0.00	0.00	0.00	0.00
80 Q 000 000 939200 000 000 000	COMMUNITY SERVI WORKING CAPITAL (CASH FLOW)	0.00	0.00	0.00	0.00
80 Q 000 000 939900 000 000 000	COMMUNITY SERVI UNASSIGNED FUND BALANCE	0.00	0.00	0.00	0.00
80 - - - - -		0.00	3,143,995.40	3,143,995.40	0.00

Fd T Loc Obj Func	Prj DeptJob	Fd T Loc Obj Fu	Account Level Description	Beginning Balance	2021-22 FYTD Debits	2021-22 FYTD Credits	Ending Balance
Grand Asset Totals				25,325,811.92	109,112,329.05	116,526,211.56	17,911,929.41
Grand Liability Totals				-12,541,081.89	69,091,109.87	58,949,921.00	-2,399,893.02
Grand Equity Totals				-12,784,730.03	34,068,319.25	36,795,625.61	-15,512,036.39
Grand Totals				0.00	212,271,758.17	212,271,758.17	0.00

Number of Accounts: 227

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

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00016	to cover negative balance	2021-2022	11/08/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		to cover negative balance	10 E 400 411 125001 000 125 000		11/04/2021	0.00	79.12
2		to cover negative balance	10 E 400 415 125001 000 125 000		11/04/2021	79.12	0.00
TOTALS						79.12	79.12

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00015	to cover negative balance due to money came o	2021-2022	11/08/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		to cover negative balance due to money came out of the wrong acct	10 E 200 310 125004 000 125 000		11/04/2021	0.00	100.00
2		to cover negative balance due to money came out of the wrong acct	10 E 200 324 125004 000 125 000		11/04/2021	100.00	0.00
TOTALS						100.00	100.00

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00014	Balance accounts not that the 2021-2022 accou	2021-2022	11/04/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		Balance Personal Service Account	10 E 832 411 253300 000 253 000		11/04/2021	0.00	119.00
2		Balance Personal Service Account	10 E 832 310 253000 000 253 000		11/04/2021	119.00	0.00
3		Balance Non-Capital Equipment account for purchase of the harley rake	10 E 832 411 253300 000 253 000		11/04/2021	0.00	225.00
4		Balance Non-Capital Equipment account for purchase of the harley rake	10 E 832 440 254200 000 253 000		11/04/2021	225.00	0.00
TOTALS						344.00	344.00

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00013	Transfer to cover higher than anticipated cos	2021-2022	11/04/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		from \$2000 set aside for floor pads at Weston and RO. - no longer needed	27 E 809 440 158000 341 809 000		11/02/2021	0.00	2,000.00
2		To curriculum - higher than anticipated cost	27 E 809 470 158000 341 809 000		11/02/2021	2,000.00	0.00
TOTALS						2,000.00	2,000.00

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00012	Transfer to cover mileage cost of contracted	2021-2022	11/04/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		Transfer from cost of contracted O and M/VI teacher	27 E 809 371 436000 341 809 000		11/02/2021	0.00	2,000.00
2		Transfer to mileage for contracted O and M/VI teacher	27 E 809 342 156700 341 809 000		11/02/2021	1,500.00	0.00
3		Transfer to cover higher than anticipated costs for psych scoring	27 E 809 411 215200 341 809 000		11/02/2021	500.00	0.00
TOTALS						2,000.00	2,000.00

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00011	to cover the week subscription for Len Fike w	2021-2022	11/04/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		to cover the week subscription for Len Fike went up in price	10 E 400 481 122435 000 122 000		11/02/2021	0.00	59.00
2		to cover the week subscription for Len Fike went up in price	10 E 400 434 122435 000 122 000		11/02/2021	59.00	0.00
TOTALS						59.00	59.00

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00002	Cori Soukup requested transfer from Travel Ac	2021-2022	11/04/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		Cori Soukup requested transfer from Travel Acct 342 to Supplies Acct 411	10 E 200 342 222200 000 220 000		11/03/2021	0.00	500.00
2		Cori Soukup requested transfer from Travel Acct 342 to Supplies Acct 411	10 E 200 411 222200 000 220 000		11/03/2021	500.00	0.00
TOTALS						500.00	500.00

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00010	District Fall newsletter	2021-2022	11/01/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		District Fall Newsletter Mailing	10 E 811 342 231100 000 231 000		11/01/2021	0.00	2,499.70
2		District Fall Newsletter Mailing	10 E 811 310 231100 000 231 000		11/01/2021	2,499.70	0.00
TOTALS						2,499.70	2,499.70

<u>BATCH</u>	<u>DESCRIPTION</u>	<u>FISCAL YEAR</u>	<u>POST DATE</u>	<u>BATCH ORIGIN</u>	<u>STATUS</u>								
21-00009	to cover paper roll	2021-2022	11/01/2021	Submit Transfer	History								
						<u>LINE</u>	<u>NAME/PROJ</u>	<u>DESCRIPTION/ADDITIONAL DESCRIPTION</u>	<u>ACCOUNT/REFERENCE</u>	<u>QUICK KEY</u>	<u>ENTRY DATE</u>	<u>DEBIT AMOUNT</u>	<u>CREDIT AMOUNT</u>
						1		to cover paper roll	10 E 300 411 127000 000 127 000		11/01/2021	0.00	68.77
						2		to cover paper roll	10 E 300 417 127000 000 127 000		11/01/2021	68.77	0.00
								TOTALS				68.77	68.77
21-00008	to cover renewal of podbean	2021-2022	11/01/2021	Submit Transfer	History								
						<u>LINE</u>	<u>NAME/PROJ</u>	<u>DESCRIPTION/ADDITIONAL DESCRIPTION</u>	<u>ACCOUNT/REFERENCE</u>	<u>QUICK KEY</u>	<u>ENTRY DATE</u>	<u>DEBIT AMOUNT</u>	<u>CREDIT AMOUNT</u>
						1		to cover renewal of podbean	10 E 300 411 127000 000 127 000		11/01/2021	0.00	7.86
						2		to cover the renewal of podbean	10 E 300 434 127000 000 127 000		11/01/2021	7.86	0.00
								TOTALS				7.86	7.86
21-00007	to cover headphones and ipad charger	2021-2022	11/01/2021	Submit Transfer	History								
						<u>LINE</u>	<u>NAME/PROJ</u>	<u>DESCRIPTION/ADDITIONAL DESCRIPTION</u>	<u>ACCOUNT/REFERENCE</u>	<u>QUICK KEY</u>	<u>ENTRY DATE</u>	<u>DEBIT AMOUNT</u>	<u>CREDIT AMOUNT</u>
						1		to cover headphones and ipad charger	10 E 300 411 127000 000 127 000		11/01/2021	0.00	64.41
						2		to cover headphones and ipad charger	10 E 300 481 127000 000 127 000		11/01/2021	64.41	0.00
								TOTALS				64.41	64.41
21-00006	TO COVER SCHOOL SAFETY PURCHASES FOR BUILDING	2021-2022	11/01/2021	Submit Transfer	History								
						<u>LINE</u>	<u>NAME/PROJ</u>	<u>DESCRIPTION/ADDITIONAL DESCRIPTION</u>	<u>ACCOUNT/REFERENCE</u>	<u>QUICK KEY</u>	<u>ENTRY DATE</u>	<u>DEBIT AMOUNT</u>	<u>CREDIT AMOUNT</u>
						1		CUSTODIAL PERSONAL SERVICES	10 E 837 310 253000 000 253 000		10/29/2021	0.00	2,000.00
						2		GENERAL SUPPLIES	10 E 837 411 253000 000 253 000		10/29/2021	2,000.00	0.00
								TOTALS				2,000.00	2,000.00
21-00005	to cover book order "Persepolis" for Dawn Whi	2021-2022	10/28/2021	Submit Transfer	History								
						<u>LINE</u>	<u>NAME/PROJ</u>	<u>DESCRIPTION/ADDITIONAL DESCRIPTION</u>	<u>ACCOUNT/REFERENCE</u>	<u>QUICK KEY</u>	<u>ENTRY DATE</u>	<u>DEBIT AMOUNT</u>	<u>CREDIT AMOUNT</u>
						1		to cover book order "Persepolis" for Dawn Whitsett	10 E 400 342 122000 000 122 000		10/28/2021	0.00	477.60
						2		to cover book order "Persepolis" for Dawn Whitsett	10 E 400 479 122000 000 122 000		10/28/2021	477.60	0.00
								TOTALS				477.60	477.60

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00004	to cover dry erase markers blk and colored fo	2021-2022	10/28/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		to cover dry erase markers blk and colored for Len Fike	10 E 400 481 122435 000	122 000	10/28/2021	0.00	17.82
2		to cover dry erase markers blk and colored for Len Fike	10 E 400 411 122435 000	122 000	10/28/2021	17.82	0.00
TOTALS						17.82	17.82

BATCH	DESCRIPTION	FISCAL YEAR	POST DATE	BATCH ORIGIN	STATUS
21-00003	Transfer of funds to cover Chairs meeting lun	2021-2022	10/28/2021	Submit Transfer	History

LINE	NAME/PROJ	DESCRIPTION/ADDITIONAL DESCRIPTION	ACCOUNT/REFERENCE	QUICK KEY	ENTRY DATE	DEBIT AMOUNT	CREDIT AMOUNT
1		Transfer of funds to cover Chairs meeting lunch	10 E 200 411 126000 000	126 000	10/28/2021	0.00	100.00
2		Transfer of funds to cover Chairs meeting lunch	10 E 200 415 126000 000	126 000	10/28/2021	100.00	0.00
TOTALS						100.00	100.00

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

Fundraiser Application

Name of Group or Organization	FBLA		
Representative Completing Form	Jennifer Gipp		
Work Phone Number	715-359-6561 x4115		
Cell Phone Number	715-470-3337		
E-Mail Address	jgipp@dce.k12.wi.us		
Please describe the details of the fundraiser below.			
Request a business sponsorship to help cover costs of competing at state and national competitions for FBLA			
What do you expect your total revenues to be?			3000
What do you anticipate your total expenses to be?			\$ 3000
Estimated fundraiser profit			\$ 0
Describe how profits from this fundraiser will be used this year to enhance the experience of all students in the program.			
This will help to remove barriers for students who qualify for state and national competitions.			
Fundraiser Start Date	11/18/2021		
Fundraiser End Date	12/31/2021		
Please place an 'X' in the YES or NO column below for each question		Yes	No
Will fundraiser include non-exempt food items sold during the day?			x
Have you been approved for a non-exempt food item fundraiser previously? Two fundraisers of non-exempt food items (food not under the Smart Snack Rules – candy, bake sales, etc.) sold during the school day are allowed for each group per year. Duration of these fundraisers may not exceed two (2) weeks.			
Will you be soliciting local businesses? (Fundraisers that solicit local businesses require school board approval.)		x	
Will alcohol be served or sold during the activity?			x
Will these funds be housed in a district activity account?		x	
Will the fundraiser use the name of D.C. Everest Schools in materials or publicity directly, indirectly or implied?		x	
If publicizing the fundraiser, please explain how:			
letter to businesses			

Instructions:

- 1) Complete and sign form (teacher, coach, co-curricular supervisor, or designated staff member.)
- 2) Submit to the principal for approval and signature.
- 3) Principal submits form to superintendent and school board for approval.

Signature of Fundraiser Representative

Date

Signature of Building Principal

Date

Signature of Superintendent

Date

Signature of School Board Clerk

Date



Book	Policy Manual
Section	Second Reading by Board
Title	CONFLICT OF INTEREST
Code	po0144.3
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	2/1/2021, 9/15/2020

0144.3 - **CONFLICT OF INTEREST**

Board members shall perform their official duties in a n ethical manner and free from conflict of interest pursuant to 19.59, Wis. Stats. To this end:

- A. no Board member shall use his/her position as a Board member to obtain financial gain or anything of substantial value for himself/herself, immediate family as defined in 19.42(7), Wis. Stats., or any organization with which s/he is associated;
- B. no Board member shall accept any offer of anything of value from a person either directly or indirectly, nor shall solicit or accept anything of value, if it could be reasonably expected to influence the Board member's actions;
- C. no Board member shall engage in or have a financial interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with his/her duties and responsibilities in the school system and as a public officer;
- D. when a member of the Board determines that the possibility of such a personal or financial interest conflict exists, s/he should, prior to the matter being considered, disclose his/her interest (such disclosure shall become a matter of record in the minutes of the Board), and thereafter shall abstain from participation in both the discussion of the matter and the vote thereon.
- E. Board members shall also perform their duties in a manner that does not violate criminal conflict of interest laws pursuant to 946.13, Wis. Stats. by having a private pecuniary interest in a contract with the District in an amount that exceeds \$15,000 annually or by participating in making or performing some function as a Board member with respect to a contract in which the Board member has a private pecuniary interest, unless statutory exceptions apply.

~~Board members shall also perform their duties in a manner that does not violate criminal conflict of interest laws pursuant to 946.13, Wis. Stats., by having a private interest in a contract with the District in an amount that exceeds \$15,000 annually.
FC 9/15/20~~

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Legal	19.42(7), Wis. Stats.
	19.59, Wis. Stats
	946.13, Wis. Stats.



Book	Policy Manual
Section	Second Reading by Board
Title	BOARD MEMBER ANTI-HARASSMENT
Code	po0145
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	6/16/2021

0145 - ~~BOARD MEMBER ANTI-SEXUAL AND OTHER FORMS OF HARASSMENT~~

The Board is committed to an environment that is free of harassment. The Board will not tolerate any form of harassment and will take all necessary and appropriate action to eliminate it.

The Board will vigorously enforce its prohibition against harassment based on race, color, national origin, age, sex (including gender status, change of sex, sexual orientation, or gender identity), pregnancy, creed or religion, genetic information, handicap or disability, marital status, citizenship status, veteran status, military service (as defined in 111.32, Wis. Stats.), ancestry, arrest record, conviction record, use or non-use of lawful products off the District’s premises during non-working hours, declining to attend an employer-sponsored meeting or to participate in any communication with the employer about religious matters or political matters, or any other characteristic protected by law in its employment practices (hereinafter referred to as "Protected Classes"), and encourages those within the School District community as well as ~~third parties~~, who feel aggrieved to seek assistance to rectify such problems. The Board prohibits harassment that affects tangible job benefits, interferes unreasonably with an individual’s work performance, or creates an intimidating, hostile, or offensive working environment. ~~Harassment may occur employee to employee, employee to student, male to female, female to male, male to male, or female to female.~~

The harassment of a District staff member, student (X) or another Board member by a member of the Board is strictly forbidden. Any member who is found to have harassed a member of the staff, a student (X) or another Board member, will be subject to discipline by the Board and may be reported to law enforcement authorities.

The Board believes that sexual or other forms of offensive speech and conduct are wholly inappropriate to the harmonious relationships necessary to the operation of the District and intolerable in an environment in which students and staff members of this District function.

Sexual harassment includes all unwelcome sexual advances, requests for sexual favors, and verbal or physical contacts of a sexual nature whenever submission to such conduct is made a condition of employment or a basis for an employment decision, or when such conduct has the purpose or effect of unreasonably interfering with work performance or creating an intimidating, hostile, or offensive working environment. (See also Policy 1422 - Nondiscrimination and Equal Employment Opportunity, Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities, Policy 3122 - Nondiscrimination and Equal Employment Opportunity, and Policy 4122 - Nondiscrimination and Equal Employment Opportunity)

Other forms of harassment include verbal or non-verbal expression related to race, gender, age, religion, disability, pregnancy, or sexual orientation.

Substantial interference with a person/employee's work performance or creation of an intimidating, hostile, or offensive work environment is established when the conduct is such that a reasonable person under the same circumstances as the person/employee would consider the conduct based on sex or one of the other Protected Classes referenced above, sufficiently severe or pervasive so as to interfere substantially with the person's work performance or create an intimidating, hostile, or offensive work environment. (See also Policy 3362.01/Policy 4362.01 - Threatening Behavior Toward Staff Members)

~~The harassment of a District staff member, student, or another Board member by a member of the Board is strictly forbidden. Any member, who is found to have harassed a member of the staff, a student, or another Board member will be subject to discipline by the Board and may be reported to law enforcement authorities. (See Bylaw 0144.5—Board Member Behavior and Code of Conduct)~~

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Legal 118.13, 120.13(1), 111.32(13), 111.36(1) Wis. Stats.
P.I. 9, Wis. Adm. Code
Title IX Education Amendments of 1972, Chapter 227

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	PRESIDENT
Code	po0171.1
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021

0171.1 - **PRESIDENT**

The President of the School Board shall:

- A. act as chairperson at meetings of the Board and ensure that minutes of meetings are properly recorded, approved, and signed;
- B. countersign all checks, share drafts, or other drafts for disbursement of District funds;
- C. defend on behalf of the District all actions brought against it;
- D. prosecute, when authorized by an annual meeting of the District School Board, actions brought by the District and an action for the recovery of any forfeiture incurred under Chapters 115 and 121 in which the District has an interest;
- E. Perform other duties appropriate to the office of the President under 120.15 Wis. Stats.

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Legal 120.15, Wis. Stats.

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	NONDISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY
Code	po1422
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	6/22/2020, 04/24/2019

1422 - **NONDISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY**

The Board does not discriminate in the employment of administrative staff on the basis of ~~the Protected Classes of~~ race, color, national origin, age, sex (including ~~trans~~gender status, change of sex, sexual orientation, or gender identity), pregnancy, creed or religion, genetic information, handicap or disability, marital status, citizenship status, veteran status, military service (as defined in 111.32, Wis. Stats.), ancestry, arrest record, conviction record, use or non-use of lawful products off the District’s premises during non-working hours, declining to attend an employer-sponsored meeting or to participate in any communication with the employer about religious matters or political matters, or any other legally protected category in its programs and activities, including employment opportunities characteristic protected by law in its employment practices.

Notice of the Board's policy on nondiscrimination and the identity of the School District's Compliance Officer(s) (see below) will be published on the District's website, posted throughout the District, and included in the District's recruitment statements or general information publications.

Definitions

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

Complainant is the individual who alleges, or is alleged, to have been subjected to discrimination/retaliation, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged discrimination/retaliation.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Military status: refers to a person's status in the uniformed services, which includes the performance of duty on a voluntary or involuntary basis in a uniformed service, including active duty, active duty for training, initial active duty for training, inactive duty for training, full-time National Guard duty, and performance of duty or training by a member of Wisconsin organized militia. It also includes the period of time for which a person is absent from employment for the purpose of an examination to determine the fitness of the person to perform any duty listed above.

Respondent is the individual who has been alleged to have engaged in discrimination/retaliation, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged discrimination/retaliation.

School District community means students and Board employees (i.e., administrators, and professional and support staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals

who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

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District Compliance Officers

The Board designates the following individuals to serve as the District's "Compliance Officers" (also known as "Civil Rights Coordinators"; hereinafter referred to as the "COs").

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets, Assistant Superintendent
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public.

The COs are responsible for coordinating the District's efforts to comply with the applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding discrimination, retaliation, or denial of equal access. The COs shall also verify that proper notice of nondiscrimination has been provided for Title II of the Americans with Disabilities Act (as amended), Title VI and Title VII of the Civil Rights Act of 1964, ~~Title IX of the Education Amendment Act of 1972,~~ Section 504 of the Rehabilitation Act of 1973 (as amended), the Age Discrimination in Employment Act of 1975, and the Genetic Information Nondiscrimination Act (GINA) to students, their parents, staff members, and the general public. ~~(X-) Any sections of the District's postings, notifications, advertisements, or other materials regarding recruiting, hiring, and promotion need to contain a statement of nondiscrimination similar to that in the Board's statement above. In addition, any gender-specific terms should be eliminated from these materials. such contracts.~~~~[END-OF OPTION] A copy of each of the Acts and regulations on which this notice is available upon request from the CO.~~

Reports and Complaints of ~~Unlawful~~ Discrimination and Retaliation

Employees are ~~required to~~~~expected to promptly~~ report incidents of ~~unlawful~~ discrimination and/or retaliation to an administrator, supervisor, or other supervisory employees so that the Board may address the conduct. Any administrator, supervisor, or other supervisory employees who receive such a ~~report~~~~complaint~~ shall file it with the CO at ~~the employee's~~~~his/her~~ first opportunity, but no later than two (2) ~~business~~ days.

Discrimination against an individual based on their sex (including gender status, sexual orientation, and gender identity) is discrimination in violation of Title VII. Specifically, discrimination on the basis of sex stereotyping/gender-nonconformity constitutes sex discrimination. This is true irrespective of the cause of the person's gender non-conforming behavior. Employment actions based upon an individual's sex could be suspect and potentially impermissible.

COs are required to investigate allegations of conduct involving the discrimination or harassment of an employee or applicant based upon his/her gender status, sexual orientation, and gender identity.

Any questions concerning whether alleged conduct might violate this prohibition should be brought to the CO's attention promptly.

Employees who believe they have been ~~unlawfully~~ discriminated/retaliated against are entitled to utilize the complaint process set forth below. Initiating a complaint will not adversely affect the ~~Complainant's~~~~complaining individual's~~ employment. While there are no time limits for initiating complaints under this policy, individuals should make every effort to file a complaint as soon as possible after the conduct occurs while the facts are known and potential witnesses are available.

The COs will be available during regular school/work hours to discuss concerns related to ~~unlawful~~ discrimination/retaliation. COs shall accept ~~reports~~~~complaints~~ of ~~unlawful~~ discrimination/retaliation directly from any member of the School District community ~~or a Third Party,~~ ~~or receive reports that are initially filed with another Board employee (District employees, students, parent(s), and member of the Board), a resident of the District, or a visitor to the District.~~ Upon receipt of a ~~report of alleged discrimination/retaliation~~~~complaint,~~ ~~the either directly or through a school building administrator, a~~ ~~[X.]~~ ~~The CO will designate a specific individual to conduct such a process as identified in a pre-defined list of investigators.~~ ~~the CO will designate a specific individual to conduct such a process.~~ The CO will provide a copy of this policy to ~~the Complainant and the Respondent upon~~

~~request any person who files a complaint. All members of the School District community must report incidents of discrimination/retaliation that are reported to them to the CO within two (2) business days of learning of the incident/conduct.~~

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Any Board employee who directly observes ~~unlawful~~ discrimination/retaliation is obligated, in accordance with this policy, to report such observations to one of the COs within two (2) business days. Additionally, any Board employee who observes an act of ~~unlawful~~ discrimination/retaliation is expected to intervene to stop the misconduct, unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other Board employees and/or local law enforcement officials, as necessary, to stop the misconduct. Thereafter, the CO must contact the ~~Complainant~~ ~~employee~~ within two (2) business days to advise ~~him/her~~ of the Board's intent to investigate the alleged wrongdoing.

Investigation and Complaint Procedure

~~Except for sex discrimination and/or sexual harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities, any employee who alleges to have been~~ ~~Any employee who believes that s/he has been~~ subjected to ~~unlawful~~ discrimination or retaliation may seek resolution of ~~the his/her~~ complaint through the procedures described below. The complaint procedures involve an investigation of the individual's claims ~~of discrimination/retaliation~~ and a process for rendering a decision regarding whether the charges are substantiated.

Once the complaint process begins, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) ~~business~~ days of the complaint being received).

The procedures set forth below are not intended to interfere with the rights of any individual to pursue a complaint of ~~unlawful~~ discrimination or retaliation with the United States Department of Education Office for Civil Rights, the Wisconsin Equal Rights Division, or the Equal Employment Opportunity Commission ("EEOC").

Complaint Procedure

~~A Complainant who alleges discrimination/retaliation~~ ~~An individual who believes s/he has been subjected to unlawful discrimination/retaliation (hereinafter referred to as the "Complainant");~~ may file a complaint, either orally or in writing, ~~1) with a Principal;~~ ~~2) the CO;~~ ~~or 3) to the Superintendent or other supervisory employees.~~ Any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall assume the role of the CO for such complaints. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who shall ~~coordinate with the other appointed/designated~~ ~~assume the role of~~ CO ~~or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO. for such complaints.~~

Due to the sensitivity surrounding complaints of ~~unlawful~~ discrimination and retaliation, timelines are flexible for initiating the complaint process; however, individuals ~~are encouraged~~ ~~should make every effort~~ to file a complaint within thirty (30) ~~calendar~~ days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a Principal, Superintendent, or other supervisory employees, either orally or in writing, about any complaint of discrimination or retaliation, that employee must report such information to the CO ~~at the employee's first opportunity, but no later than~~ ~~within~~ two (2) ~~business~~ days.

Throughout the course of the process, the CO should keep the parties ~~reasonably~~ informed of the status of the investigation and the decision-making process.

All complaints must include the following information to the extent ~~known it is available~~: the identity of the ~~Respondent individual believed to have engaged in, or be engaging in, the discriminatory/retaliatory conduct~~; a detailed description of the facts upon which the complaint is based ~~(i.e., when, where, and what occurred)~~; a list of potential witnesses; and the resolution sought by the Complainant.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the CO shall ask for such details in an oral interview. Thereafter, the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken in the investigatory phase to protect the Complainant from further discrimination or retaliation, including, but not limited to, a change of work assignment or schedule for the Complainant and/or the ~~Respondent person who allegedly engaged in the misconduct~~. In making such a determination, the CO should consult the Complainant to assess ~~whether the individual agrees with his/her position to~~ the proposed action. If the Complainant is unwilling to consent to the proposed change, the CO may still ~~may~~ take whatever actions ~~are deemed~~ ~~s/he deems~~ appropriate in consultation with the Superintendent.

~~Within two (2) days of receiving the complaint, the CO or designee will initiate an investigation by at a minimum confirming receipt of the complaint with the Complainant and informing the Complainant of the investigation process. Within two (2) business days of receiving the complaint, the CO will initiate an investigation to determine whether the Complainant has been subjected to unlawful discrimination/retaliation.~~

Simultaneously, the CO will inform the Respondent that a formal individual alleged to have engaged in the discriminatory or retaliatory conduct (hereinafter referred to as the "Respondent"), that a complaint has been received. The Respondent will be informed about the nature of the allegations and upon request provided with a copy of any relevant policies and/or administrative guidelines, including this Policy. The Respondent must also be informed of the opportunity to submit a written response to the complaint and the obligation to do so within five (5) ~~business~~ days.

Investigations shall be completed promptly. What constitutes promptness will depend on the complexity of the issues, the number of incidents or factual elements, the number of witnesses and documents to be consulted, and the availability of witnesses and other evidence. The CO shall keep the Complainant reasonably informed of the investigation's progress. [END OF OPTIONS] Although certain cases may require additional time, the CO will attempt to complete an investigation into the allegations of discrimination/retaliation within fifteen (15) business days of receiving the formal complaint. The investigation will include:

The investigation will include:

- A. interviews with the Complainant;
- B. interviews with the Respondent;
- C. interviews with any other witnesses who may reasonably be expected to have any information relevant to the allegations, as determined by the CO;
- D. consideration of any documentation or other information presented by the Complainant, Respondent, or any other witness that is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO shall prepare and deliver a written report to the Superintendent that summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definition of ~~unlawful~~ discrimination/retaliation as provided in Board policy and State and Federal law as to whether the Respondent has engaged in harassment/retaliation of the Complainant ~~Complainant has been subjected to unlawful discrimination/retaliation~~. The CO's recommendations must be based upon the totality of the circumstances. In determining if discrimination or retaliation occurred, a preponderance of evidence standard will be used.

The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.

In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation, the CO may in consultation with the Superintendent or Board President, if the matter involves the Superintendent, engage outside legal counsel to conduct the investigation consistent with this policy.

Absent extenuating circumstances, within five (5) ~~business~~ days of receiving the report of the CO, the Superintendent ~~either~~ must ~~either~~ issue a written final decision regarding whether the charges have been substantiated or request further investigation. An ~~summary explanation of the copy of~~ the Superintendent's final decision will be provided delivered to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within five (5) ~~business~~ days, or as quickly as possible if additional time is necessary due to the availability of necessary witness(es) or documents. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above.

If the Superintendent determines the Respondent engaged in discrimination/retaliation toward the Complainant, the Superintendent ~~Complainant was subjected to unlawful discrimination/retaliation, s/he~~ must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the discrimination/retaliation. The corrective action should be reasonable, timely, age-appropriate, effective, and tailored to the specific situation.

A Complainant or Respondent who is dissatisfied with the final decision of the Superintendent may appeal through a signed written statement to the Board within five (5) ~~business~~ days of the party's his/her receipt of the Superintendent's ~~final~~ decision. The written statement of appeal must be submitted to the Superintendent, who will forward the request to the Board President.

In an attempt to resolve the complaint, the Board shall review the findings and may meet with the concerned parties and their representatives within twenty (20) ~~business~~ days of the receipt of such an appeal. A copy of the Board's disposition of the appeal shall be sent to each concerned party within ten (10) ~~business~~ days of its decision. The decision of the Board will be final.

The Board reserves the right to investigate and resolve a complaint or report of ~~unlawful~~ discrimination/retaliation regardless of whether the ~~Complainant~~ ~~employee alleging the misconduct~~ pursues the complaint. The Board also reserves the right to have the complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board ~~or its designee~~. 57

The parties may be represented, at their own cost, at any of the above-described interviews/meetings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint ~~process~~ ~~procedure~~ is not a prerequisite to the pursuit of other remedies.

Privacy/Confidentiality

The Board will employ all reasonable efforts to protect the rights of the Complainant, the Respondent(s), and the witnesses as much as possible, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery or disclosure obligations.

All records generated under the terms of this policy shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Respondents must be provided an opportunity to meaningfully respond to allegations, which may include disclosure of the Complainant's identity. ~~Additionally, the Respondent must be provided the Complainant's identity. All Complainants will be advised that their identities may become known to the Respondent(s) through the investigation process.~~

During the course of an investigation, the CO will instruct each person who is interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of an investigation is expected not to disclose to third parties any information that ~~is learned or provided~~ ~~s/he learns and/or provides~~ during the course of the investigation.

Remedial Action ~~Sanctions~~ and Monitoring

~~The Board shall vigorously enforce its prohibitions against unlawful discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct. While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee. All disciplinary action will be taken in accordance with applicable State law. When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter. In those cases where unlawful discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies and/or the Employee Handbook.~~

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to the discrimination, or other appropriate action.

The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and any relevant codes of conduct.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the age and maturity level of any student involved. In those cases where discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior ~~disciplinary~~ ~~remedial~~ action has been taken against ~~the Respondent~~ ~~an employee~~, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its recurrence, and remedy its effect.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging ~~unlawful~~ discrimination/retaliation, or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made by any Federal or State civil rights law, or because that individual made a report, formal complaint, testified, assisted or participated or refused to participate in any manner in an

~~investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy. Specifically, the Board will not retaliate against, coerce, intimidate, threaten or interfere with any individual because the person opposed any act or practice made unlawful by any Federal or State civil rights law, or because that individual made a charge, testified, assisted or participated in any manner in an investigation, proceeding, or hearing under those laws, or because that individual exercised their rights, aided or encouraged any other person in the exercise of any right granted or protected by those laws.~~ 58

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of ~~unlawful~~ discriminatory practices. The Superintendent shall provide appropriate information to all members of the School District community related to the implementation of this policy and shall provide training for District staff where appropriate. All training, as well as all information provided regarding the Board's policy and discrimination in general, will be age and content appropriate.

Retention of Investigatory Records and Materials

The CO is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all ~~information,~~ documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include~~including,~~ but are not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;
- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;
- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
- F. all documentary evidence;
- G. e-mails, texts, or social media posts pertaining to the investigation;
- H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
- I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;
- J. dated written determinations to the parties;
- K. dated written descriptions of verbal notifications to the parties;
- L. written documentation of any ~~supportive interim~~ measures offered and/or provided to the Complainant and/or the Respondent/complainants, including no contact orders issued to both parties, the dates issued, and the dates the parties acknowledged receipt; and
- M. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects;

- N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Codes of Conduct and/or Employee Handbooks); 59
- O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy.; ~~REMINDER: Documentation of training should be maintained regardless of whether there is an investigation of an alleged violation of this policy. It is best practice to maintain a log of all staff members who participate in a training, along with the date, time and location of the training, and a copy of the materials reviewed and/or presented during the training.]]~~

The ~~information~~, documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The ~~information~~, documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

~~Revised 4/24/19~~

~~T.C. 6/22/20~~

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Legal

111.31 et seq., Wis. Stats.

111.335(d)(2), Wis. Stats.

118.195, Wis. Stats.

118.20, Wis. Stats.

Fourteenth Amendment, U.S. Constitution

20 U.S.C. Section 1701 et seq., Equal Educational Opportunities Act of 1974

20 U.S.C. Section 7905, Boy Scouts of America Equal Access Act

29 U.S.C. 701 et seq., Rehabilitation Act of 1973, as amended

38 U.S.C. 4301 et seq., Uniformed Services Employment and Reemployment Rights Act

42 U.S.C. 2000 et seq., Civil Rights Act of 1964

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

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

42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act of 1973 as amended

42 U.S.C. 6101 et seq., Age Discrimination Act of 1975

42 U.S.C. 12101 et seq., The Americans with Disabilities Act of 1990, as amended

29 C.F.R. Part 1635, The GINA Regulations

34 C.F.R. Part 110, The Age Discrimination Act Regulations

Cross References [1422F - Discrimination/Harassment Complaint Form](#)

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	NONDISCRIMINATION BASED ON GENETIC INFORMATION OF THE EMPLOYEE
Code	po1422.02
Status	Second Reading
Adopted	May 25, 2016
Last Revised	October 15, 2021

1422.02 - **NONDISCRIMINATION BASED ON GENETIC INFORMATION OF THE EMPLOYEE**

The Board of Education prohibits discrimination on the basis of genetic information in all aspects of employment, including hiring, firing, compensation, job assignments, promotions, layoffs, training, fringe benefits, or any other terms, conditions, or privileges of employment. The Board also does not limit, segregate, or classify applicants or employees in any way that would deprive or tend to deprive them of employment opportunities or otherwise adversely affect the status of the person as an employee as an employee, based on genetic information. Harassment of a person because of his/her genetic information is also is prohibited. Likewise, retaliation against a person for identifying, objecting to, or filing a complaint concerning a violation of this policy an applicant or employee for engaging in protected activity is prohibited.

The identity of the Compliance Officer (see Policy 1422 - Nondiscrimination and Equal Employment Opportunity) shall be posted throughout the District and published in any District statement regarding the prohibition of discrimination on the basis of genetic information in all aspects of employment, in any staff handbooks, and in general information publications of the District as required by Federal and State law and on the District website.

In accordance with Title II of the Genetic Information Nondiscrimination Act of 2008, 42 U.S.C. 2000ff, et seq., and 29 C.F.R. Part 1635 ("GINA"), the Board shall not request, require or purchase genetic information of employees, their family members or applicants for employment. Further, in compliance with GINA this Act, applicants and employees are directed not to provide any genetic information, including the individual's family medical history, in response to necessary requests for medical information, with the exception that family medical history may be provided acquired as part of the certification process for FMLA leave, or when an employee is asking for leave to care for an immediate family member with a serious health condition. Applicants for employment are directed not to provide any genetic information, including the individual's family medical history, in response to requests for medical information as part of the District's application for employment process. Employees and applicants for employment shall not be penalized for providing genetic information in good faith in response to a request from a District employee or agent, unless that applicant or employee refuses to delete the information at the request of the employee or agent of the District.

The Board District recognizes that genetic information may be acquired through commercially and publicly available media including documents like newspapers, books, magazines, periodicals, television shows or the Internet. The Board District prohibits, however, District its employees and agents including commercial background investigation agents from searching these such sources with the intent of finding or obtaining genetic information, or accessing sources from which they are likely to acquire genetic information. If genetic information about an employee or applicant is obtained in error, it shall be redacted immediately and not shared beyond the point of first receipt.

As used in this policy, "Genetic information," as defined by GINA, means information about: (a) an individual's genetic tests; (b) the genetic tests of that individual's family members; (c) the manifestation of disease or disorder in family members of the individual (i.e., family medical history); (d) an individual's request for, or receipt of, genetic services, or the participation in clinical research that includes genetic services by the individual or a family member of the individual; or (e) the genetic information of a fetus carried by an individual or a pregnant woman who is a family member of the individual and the genetic information of an embryo legally held by an individual or family member using assistive reproductive technology.

The term "genetic information" does not include information about the sex or age of the individual, the sex or age of family members, or information about the race or ethnicity of the individual or family member that is not derived from a genetic test.

As used in this policy, "genetic test" means an analysis of human DNA, RNA, chromosomes, proteins, or metabolites that detect genotypes, mutations, or chromosomal changes. The term includes any test of a person's DNA/RNA.

If the District's employees or agents District either legally and/or inadvertently receives genetic information about an employee or applicant for employment from the employee, applicant for employment, or a medical provider it shall be treated as a confidential medical record in accordance with law.

The District's Superintendent shall appoint a Compliance Officer (see Policy 1422 - Nondiscrimination and Equal Employment Opportunity) who shall be responsible for overseeing the Board District's compliance with this policy and GINA and proposing revisions and additions to this policy as necessary to ensure the Board's compliance with GINA Federal regulations and promptly dealing with any inquiries or complaints. This person shall be responsible for working with the Board's legal counsel to fully implement the requirements of GINA in all activities of the School District. The Compliance Officer S/He shall also shall verify that proper notice of nondiscrimination for Title II of GINA the Genetic Information Nondiscrimination Act of 2008 is provided to staff members, and that all District requests for health-related information (e.g., to support an employee's request for reasonable accommodation under the ADA or a request for sick leave) are accompanied by a written warning that directs the employee or health care provider not to collect or provide genetic information. The warning shall read as follows:

Genetic Information Nondiscrimination Act of 2008 (GINA) Disclosure Requirement

The Genetic Information Nondiscrimination Act of 2008 or ("GINA") prohibits employers and other entities covered by the law GINA Title II, including the Board of Education, from requesting or requiring genetic information of an employee or applicant individual or family member of an employee or applicant the individual, except as specifically allowed by law. To comply with GINA this law, do not provide any genetic information when responding to this request for medical information (unless the request pertains to a request for FMLA leave for purposes of caring for an immediate family member with a serious health condition). "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic test, the fact that an individual or an individual's family member sought or received genetic services or participated in clinical research that includes genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services. Questions concerning compliance with the requirements of GINA may be directed to the Compliance Officer at 715-359-4221.

The Board District offers health services. Participation in the services/program is voluntary. Genetic information (such as family medical history) may be obtained as part of an individual's participation in the service/program. If that occurs, individual genetic information may be provided to the individual receiving the services and to his/her health services providers, but only genetic information in aggregate form will be provided to the District Board and no applicant or employee shall be identified or identifiable from the reported information.

The grievance procedure for complaints of discrimination in Policy 1422 applies to complaints of discrimination, including harassment, or retaliation prohibited by GINA and may be utilized if an employee alleges discrimination or harassment on the basis of genetic information or retaliation for identifying, objecting to, or filing a complaint concerning a violation of GINA or this policy.

42 U.S.C. 2000ff et seq.
Title II, The Genetic Information Nondiscrimination Act of 2008
29 C.F.R. Part 1635

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Legal 42 U.S.C. 2000ff et seq.
Title II, The Genetic Information Nondiscrimination Act of 2008
29 C.F.R. Part 1635

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	SECTION 504/ADA PROHIBITION AGAINST DISABILITY DISCRIMINATION IN EMPLOYMENT
Code	po1623
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	6/22/2020

1623 - SECTION 504/ADA PROHIBITION AGAINST DISABILITY DISCRIMINATION IN EMPLOYMENT

The Board prohibits discrimination against any employee or applicant based upon his/her disability. As such, the Board will not engage in employment practices or adopt policies that discriminate on the basis of disability, or otherwise discriminate against qualified individuals with disabilities in regard to job application procedures, the hiring, advancement or discharge of employees, employee compensation, job training, or other terms, conditions and privileges of employment. The Board further will not limit, segregate or classify applicants or employees in any way that adversely affects their opportunities or status because of disability. Additionally, the Board will not participate in any contractual or other relationships that have the effect of subjecting qualified individuals with disabilities who are applicants or employees to discrimination on the basis of disability.

Notice of the Board's policy on nondiscrimination in employment practices and the identity of the School District's Compliance Officer(s) (see below) will be published on the District's website, posted throughout the District, and included in the District's recruitment statements or general information publications.

Definitions

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

Complainant: is the individual who alleges or is alleged to have been subjected to discrimination/retaliation, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged discrimination/retaliation.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Respondent: is the individual who is alleged to have engaged in discrimination/retaliation, regardless of whether the Complainant files a formal complaint or is seeking an informal resolution to the alleged discrimination/retaliation.

District community: means students, District employees (i.e., administrators, and professional and support staff), and Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties: include but are not limited to guests and/or visitors on District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with or seeking to do business with the Board, and other individuals who come in contact with members of the District community at school-related events/activities (whether on or off District property).

An individual with a disability means a person who has, **has had** a record of, or is regarded as having, a physical or mental impairment that substantially limits one or more major life activities.

Major Life Activities

Major life activities are functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, eating, sleeping, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, sitting, reaching, interacting with others, and working. 63

Major life activities also include the operation of a major bodily function, including, but not limited to, functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, hemic, lymphatic, musculoskeletal and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

Impairment That Substantially Limits a Major Life Activity

~~An impairment that is episodic in nature or in remission is considered a disability if it would substantially limit a major life activity when active.~~

The determination of whether an impairment substantially limits a major life activity must be made without regard to the ameliorative effects of mitigating measures such as medication, medical supplies, equipment or appliances, low-vision devices (defined as devices that magnify, enhance, or otherwise augment a visual image, but not including ordinary eyeglasses or contact lenses), prosthetics (including limbs and devices), hearing aid(s) and cochlear implant(s) or other implantable hearing devices, mobility devices, oxygen therapy equipment or supplies, use of assistive technology, reasonable accommodations or "auxiliary aids or services," learned behavioral or adaptive neurological modifications, psychotherapy, behavioral therapy, or physical therapy.

An impairment that is episodic in nature or in remission is considered a disability if it would substantially limit a major life activity when active.

Qualified Individual with a Disability

A qualified individual person with a disability means the individual satisfies the requisite skill, experience, education and other job-related requirements of the employment position the such individual holds or desires and ~~with or without reasonable accommodation,~~ can perform the essential functions of the job in question, with or without reasonable accommodation.

Reasonable Accommodation

The Board will provide a reasonable accommodation to a qualified individual who has an actual disability or who has a record of a disability unless the accommodation would impose an undue hardship on the operation of the Board District's program and/or activities. A reasonable accommodation is not ~~necessarily~~ required for an individual who is merely regarded as having a disability.

Facilities

No qualified person with a disability will be denied the benefits of, excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which Section 504/American with Disabilities Act (ADA) applies because the District's facilities are inaccessible to or unusable by persons with disabilities.

For facilities constructed or altered after June 3, 1977, the District will comply with applicable accessibility standards. For those existing facilities constructed prior to June 3, 1977, the District is committed to operating its programs and activities so that they are readily accessible to persons with disabilities.

District Compliance Officer(s)

The Board designates the following individual(s) to serve as the District's 504 CO(s)/ADA Coordinator(s) (hereinafter referred to as the "COs").

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets, Assistant Superintendent
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The name(s), title(s), and contact information of this/these individual(s) will be published annually on the School District's website.

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The COs are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding discrimination/retaliation or denial of equal access. The COs also shall verify that proper notice of nondiscrimination for Title II of the Americans with Disabilities Act (as amended), Title VI and Title VII of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 (as amended), and the Age Discrimination in Employment Act of 1975 is provided to staff members and the general public. A copy of each of the Acts and regulations on which this notice is based will be made available upon request from the CO. ~~Any sections of the and fulfill its responsibilities under Section 504 and Title II of the Americans with Disabilities Act, as amended ("ADA"). A copy of Section 504 and the ADA, including copies of their implementing regulations, may be obtained from the District COs.~~

The COs will oversee the investigation of any complaints of discrimination based on disability, which may be filed pursuant to the Board's adopted internal complaint procedure, and will attempt to resolve such complaints. Any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall assume the role of the CO for such complaints, as appropriate. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who shall coordinate with the other appointed/designated CO, or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO.

The Board will provide for the prompt and equitable resolution of complaints alleging violations of Section 504/ADA. (See Complaint Procedure below.)

Training

~~The COs will also oversee the training of employees in the District so that all employees understand their rights and responsibilities under Section 504 and the ADA, and are informed of the Board's policies, administrative guidelines, and practices with respect to fully implementing and complying with the requirements of Section 504/ADA.~~

~~The Board will provide in-service training and consultation to staff responsible for the education of persons with disabilities, as necessary and appropriate.~~

Facilities

~~No qualified person with a disability will, because the District's facilities are inaccessible to or unusable by persons with disabilities, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which Section 504/ADA applies.~~

~~For facilities constructed or altered after June 3, 1977, the District will comply with applicable accessibility standards. For those existing facilities constructed prior to June 3, 1977, the District is committed to operating its programs and activities so that they are readily accessible to persons with disabilities.~~

Notice

~~Notice of the Board's policy on nondiscrimination in employment practices and the identity of the COs will be posted throughout the District, and published in the District's recruitment statements or general information publications.~~

Complaint Procedures

If a person believes that s/he has been discriminated against on the basis of his/her disability, the person may utilize the following complaint procedures as a means of reaching, at the lowest possible administrative level, a prompt and equitable resolution of the matter.

In accordance with Section 504 of the Rehabilitation Act of 1973 and its implementing regulations ("Section 504"), employees will be notified of their right to file an internal complaint regarding an alleged violation, misinterpretation, or misapplication of Section 504. In addition, employees will be notified of their right to file a complaint with the U.S. Department of Education's Office for Civil Rights.

Internal complaints must be put in writing and must identify the specific circumstances or areas of dispute that have given rise to the complaint, and offer possible solutions to the dispute. The complaint must be filed with COs within the time limits specified below. The COs are available to assist individuals in filing a complaint.

Internal Complaint Procedure

The following internal complaint procedure is available to employees for the prompt and equitable resolution of complaints alleging discrimination based upon disability. Use of the internal complaint procedure is not a prerequisite to the pursuit of other remedies,

including the filing of a complaint with the U.S. Department of Education's Office for Civil Rights.

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- A. An employee with a complaint based on alleged discrimination on the basis of disability may first discuss the problem with the CO.
- B. If the informal discussion does not resolve the matter, or if the employee skips Step A, the individual may file a formal written complaint with the CO. The written complaint must contain the name and address of the individual or representative filing the complaint, be signed by the Complainant or someone authorized to sign for the Complainant, describe the alleged discriminatory action in sufficient detail to inform the CO of the nature and date of the alleged violation and propose a resolution. The complaint must be filed within thirty (30) ~~calendar~~ days of the circumstances or event giving rise to the complaint unless the time for filing is extended by the CO for good cause.
- C. The CO will conduct an independent investigation of the matter (which may or may not include a hearing). This complaint procedure contemplates informal, but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to present witnesses and other evidence relevant to the complaint. The CO will provide the Complainant with a written disposition of the complaint within ten (10) ~~business~~ days. If no decision is rendered within ten (10) business days, or the decision is unsatisfactory in the opinion of the Complainant, the employee may file, in writing, an appeal with the Superintendent. The CO shall maintain the District's files and records relating to the complaint.
- D. The Superintendent will, within ten (10) ~~business~~ days of receiving the written appeal, conduct a hearing with all parties involved in an attempt to resolve the complaint.
- The Superintendent will render his/her decision within ten (10) ~~business~~ days of the hearing.
- E. The employee may be represented, at his/her own cost, at any of the above-described meetings/hearings.
- F. The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights or the filing of a court case. Use of this internal complaint procedure is not a prerequisite to the pursuit of other remedies.

If it is determined that the Complainant was subjected to ~~unlawful~~ discrimination, the CO must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the discrimination/retaliation. The corrective action should be reasonable, timely, effective, and tailored to the specific situation.

OCR Complaint

At any time, if an employee believes that s/he has been subjected to discrimination based upon his/her disability in violation of Section 504 or the ADA, the individual may file a complaint with the U.S. Department of Education's Office for Civil Rights ("OCR"). The OCR can be reached at:

U.S. Department of Education Office for Civil Rights Citigroup Center
500 W. Madison Street Suite 1475
Chicago, IL 60661
(312) 730-1560
FAX: (312) 730-1576
TDD: (877) 521-2172
E-mail: OCR.Chicago@ed.gov

Privacy/Confidentiality

The District will employ all reasonable efforts to protect the rights of the Complainant, the Respondent(s), and the witnesses as much as possible, consistent with the District's legal obligations to investigate, take appropriate action, and conform with any discovery or disclosure obligations.

All records generated under the terms of this policy shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided the Complainant's identity.

During the course of a formal investigation, the CO or designee will instruct each person who is interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of an investigation is expected not to disclose to third parties any information that is learned or provided during the course of the investigation.

Remedial Action and Monitoring

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to the discrimination or other appropriate action.

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The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and any relevant codes of conduct.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the age and maturity level of any student involved. In those cases where discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior disciplinary action has been taken against the Respondent, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its recurrence, and remedy its effect.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging ~~unlawful~~ discrimination/retaliation, or participates as a witness in an investigation, is prohibited. ~~Neither the Board nor any other person may intimidate, threaten, coerce, Specifically, the Board will not discriminate/retaliate against, coerce, intimidate, threaten~~ or interfere with any individual because the person opposed any act or practice made ~~unlawful~~ by Section 504 or the ADA, or because that individual made a report, formal complaint charge, testified, assisted or participated, or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of discriminatory practices. The Superintendent shall provide appropriate information to all members of the District community related to the implementation of this policy and shall provide training for District students and staff where appropriate. All training and information provided regarding the Board's policy and discrimination, in general, will be age and content-appropriate.

Retention of Investigatory Records and Materials

The CO is responsible for overseeing the retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include but are not limited to:

- A. all written reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy;
- B. any narratives that memorialize oral reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy;
- C. any documentation that memorializes the actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities related to the investigation and/or the District's response to the alleged violation of this

policy;

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- D. written witness statements;
- E. narratives, notes from, and audio, video, or digital recordings of witness interviews/statements;
- F. e-mails, texts, and social media posts that directly relate to or constitute evidence pertaining to an alleged violation of this policy (i.e., not after-the-fact commentary about or media coverage of the incident);
- G. notes and summaries prepared contemporaneously by the investigator in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.), but not including transitory notes whose content is otherwise memorialized in other documents;
- H. written disciplinary sanctions issued to students or employees and other documentation that memorializes oral disciplinary sanctions issued to students or employees for violations of this policy;
- I. dated written determinations/reports (including summaries of relevant exculpatory and inculpatory evidence) and other documentation that memorializes oral notifications to the parties concerning the outcome of the investigation, including any consequences imposed as a result of a violation of this policy;
- J. documentation of any supportive measures offered and/or provided to the Complainant and the Respondent, including no contact orders issued to both parties, the dates the no contact orders were issued, and the dates the parties acknowledged receipt of the no contact orders;
- K. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects;
- L. copies of the Board policy and procedures/guidelines used by the District to conduct the investigation and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Codes of Conduct and/or Employee Handbooks);
- M. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- N. documentation of any training provided to District personnel related to this policy including, but not limited to notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conduct an investigation of an alleged violation of this policy.

The documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal (e.g., FERPA, ADA) and/or State law, such as student records and confidential medical records.

The documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years and longer if required by the District's records retention schedule.

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Legal	29 U.S.C. 794, Section 504 Rehabilitation Act of 1973, as amended
	42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended
	29 C.F.R. Part 1630
	34 C.F.R. Part 104

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	EMPLOYEE ANTI-HARASSMENT
Code	po1662
Status	Second Reading
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1662 - **EMPLOYEE ANTI-HARASSMENT**

Prohibited Harassment

The Board is committed to a work environment that is free of harassment of any form. The Board will not tolerate any form of harassment and will take all necessary and appropriate action to eliminate it. Any member of the School District community who violates this policy will be subject to disciplinary action, up to and including termination of employment. Additionally, appropriate action will be taken to stop and otherwise deal with any third party who engages in harassment against our employees.

The Board will vigorously enforce its prohibition against harassment based on race, color, national origin, age, sex (including transgender status, change of sex, sexual orientation, or gender identity), pregnancy, creed or religion, genetic information, handicap or disability, marital status, citizenship status, veteran status, military service (as defined in 111.32, Wis. Stats.), ancestry, arrest record, conviction record, use or non-use of lawful products off the District’s premises during non-working hours, declining to attend an employer-sponsored meeting or to participate in any communication with the employer about religious matters or political matters, ~~(collectively, "Protected Classes")~~, or any other characteristic protected by law in its employment practices (hereinafter referred to as ~~"harassment"~~ ~~"Protected Classes Characteristics"~~), and encourages those within the School District community as well as ~~T~~third ~~P~~parties, who feel aggrieved to seek assistance to rectify such problems. The Board prohibits harassment that affects tangible job benefits, interferes unreasonably with an individual’s work performance, or creates an intimidating, hostile, or offensive working environment. Harassment may occur employee-to-employee, employee-to-student, male-to-female, female-to-male, male-to-male, or female-to-female.

The Board will investigate all allegations of harassment and, in those cases where harassment is substantiated, ~~the Board will~~ take immediate steps ~~calculated~~ to end the harassment, prevent its reoccurrence, and, ~~if applicable,~~ remedy its effects.

Individuals who are found to have engaged in harassment will be subject to appropriate disciplinary action.

~~[] The District will offer counseling services to any person found to have been subjected to harassment and, where appropriate, the person(s) who committed the harassment.~~

~~For purposes of this policy, "School District community" means individuals subject to the control and supervision of the Board including, but not limited to, students, teachers, staff, volunteers, and Board members, agents, contractors, or other persons.~~

~~For purposes of this policy, "third parties" include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with the District, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off School District property).~~

Notice

Respondent: is the individual who has been alleged to have engaged in harassment, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged harassment.

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School District community: means students and Board employees (i.e., administrators, and professional and support staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties: include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

Bullying

Bullying rises to the level of harassment when one or more persons systematically and chronically inflict physical hurt or psychological distress on one (1) or more students or employees and that bullying is based upon one (1) or more Protected Classes, that is, characteristics that are protected by Federal civil rights laws. It is defined as any unwanted and repeated written, verbal, or physical behavior, including any threatening, insulting, or dehumanizing gesture, by an adult or student, that is severe or pervasive enough to create an intimidating, hostile, or offensive educational or work environment; cause discomfort or humiliation; or unreasonably interfere with the individual's school or work performance or participation; and may involve:

- A. teasing;
- B. threats;
- C. intimidation;
- D. stalking;
- E. cyberstalking;
- F. cyberbullying;
- G. physical violence;
- H. theft;
- I. sexual, religious, or racial harassment;
- J. public humiliation; or
- K. destruction of property.

~~"Harassment" means any threatening, insulting, or dehumanizing gesture, use of data or computer software, or written, verbal or physical conduct directed against a school employee on the basis of the employee's Protected Classes/Characteristics that:~~

- ~~A. places a school employee in reasonable fear of harm to his/her person or damage to his/her property;~~
- ~~B. is sufficiently severe, pervasive, and persistent so as to create a hostile working environment which materially alters the employee's working conditions from the perspective of a reasonable person similarly situated;~~
- ~~C. has the effect of substantially disrupting the orderly operation of a school or any other aspect of the District's operations.~~

"Harassment" also includes "hate speech"—the use of language, behavior, or images/symbols that express prejudice against a particular group or groups on the basis of any protected characteristic(s).

Examples are:

- A. making statements that promote violence toward a racial or ethnic group;
- B. drawing, displaying, or posting images or symbols of prejudice (e.g., swastikas).

Sexual Harassment

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For purposes of this policy and consistent with Pursuant to Title VII of the Civil Rights Act of 1964, and Title IX of the Educational Amendments of 1972, "sexual harassment" is defined as unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct based on sex constitutes sexual harassment when:

- A. a supervisory employee engages in harassing behavior towards a subordinate employee, regardless of whether such conduct creates a hostile work environment;
- B. acquiescence in or submission to such conduct is an explicit or implicit term or condition of employment;
- C. an individual's acquiescence in, submission to, or rejection of such conduct becomes the basis for employment decisions affecting that individual;
- D. such conduct is sufficiently severe, pervasive, and persistent such that it has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment;
- E. consensual sexual relationships where such relationship leads to favoritism of a subordinate employee with whom the superior is sexually involved and where such favoritism results in an adverse employment action for another employee or otherwise creates a hostile work environment;
- F. inappropriate boundary invasions by a District employee or other adult member of the District into a student's personal space and personal life.

Sexual harassment may involve the behavior of a person of any either gender against a person of the same or another opposite gender.

Sexual Harassment covered by Policy 2266/AG 2266 – Nondiscrimination on the Basis of Sex in Education Programs or Activities, i.e., sexual harassment prohibited by Title IX, is not included in this policy. Allegations of such conduct shall be addressed solely by Policy 2266/AG 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities.

Prohibited acts that constitute sexual harassment under this policy may take a variety of forms. Examples of the kinds of conduct that may constitute sexual harassment include, but are not limited to:

- A. unwelcome sexual propositions, invitations, solicitations, and flirtations;
- B. unwanted physical and/or sexual contact assault;
- C. threats or insinuations that a person's employment, wages, promotion, assignments, or other conditions of employment may be adversely affected by not submitting to sexual advances;
- D. unwelcome verbal expressions of a sexual nature, including graphic sexual commentaries about a person's body, dress, appearance, or sexual activities; the unwelcome use of sexually degrading language, profanity, jokes or innuendoes; unwelcome suggestive or insulting sounds or whistles; obscene telephone calls, text messages, or social media postings;
- E. sexually suggestive objects, pictures, graffiti, videos videotapes, posters, audio recordings, or literature, placed in the work or educational environment that reasonably may embarrass or offend individuals; ~~remarks speculating about a person's sexual activities or sexual history, or remarks about one's own sexual activities or sexual history;~~
- F. unwelcome and inappropriate touching, patting, or pinching; obscene gestures;
- G. asking or telling about sexual fantasies, sexual preferences, or sexual activities;
- H. speculation about a person's sexual activities or sexual history or remarks about one's own sexual activities or sexual history;
- I. giving unwelcome personal gifts, such as lingerie, that suggest the desire for a romantic relationship;
- J. leering or staring at someone in a sexual way, such as staring at a person's breasts, buttocks, or groin;
- K. consensual sexual relationships where such relationship leads to favoritism of a subordinate employee with whom the superior is sexually involved and where such favoritism adversely affects other employees or otherwise creates a hostile work

environment; ~~and~~

- L. inappropriate boundary invasions by a District employee or other adult member of the School District community into a student's personal space and personal life; and ⁷¹
- M. verbal, nonverbal or physical aggression, intimidation, or hostility based on sex or sex-stereotyping that does not involve conduct of a sexual nature.

Sexual relationships between staff members, where one staff member has supervisory responsibilities over the other, are discouraged as a matter of Board policy. Such relationships have an inherent possibility of being construed as sexual harassment because the consensual aspect of the relationship may be the result of implicit or explicit duress caused by uncertainty regarding the consequences of non-compliance.

Romantic or sexual relationships between District staff (teachers, aides, administrators, coaches or other school authorities) and a student is expressly prohibited. Any school staff member who engages in sexual conduct with a student may also be guilty of a crime and any information regarding such instances will be reported to law enforcement authorities.

Boundary Invasions

Boundary invasions may be appropriate or inappropriate. Appropriate boundary invasions make medical or educational sense. For example, a teacher or aide assisting a kindergartner after a toileting accident or a coach touching a student during wrestling or football can be appropriate. However, other behaviors might be going too far, are inappropriate and may be signs of sexual grooming. Inappropriate boundary invasions may include, but are not limited to the following:

- A. hugging, kissing, or other physical contact with a student;
- B. telling sexual jokes to students;
- C. engaging in talk containing sexual innuendo or banter with students;
- D. talking about sexual topics that are not related to curriculum;
- E. showing pornography to a student;
- F. taking an undue interest in a student (i.e. having a "special friend" or a "special relationship");
- G. initiating or extending contact with students beyond the school day for personal purposes;
- H. using e-mail, text messaging, or websites to discuss personal topics or interests with students;
- I. giving students rides in the staff member's personal vehicle or taking students on personal outings without administrative approval;
- J. invading a student's privacy (e.g. walking in on the student in the bathroom, locker-room, asking about bra sizes or previous sexual experiences);
- K. going to a student's home for non-educational purposes;
- L. inviting students to the staff member's home without proper chaperones (i.e. another staff member or parent of student);
- M. giving gifts or money to a student for no legitimate educational purpose;
- N. accepting gifts or money from a student for no legitimate educational purpose;
- O. being overly "touchy" with students;
- P. favoring certain students by inviting them to come to the classroom at non-class times;
- Q. getting a student out of class to visit with the staff member;
- R. providing advice to or counseling a student regarding a personal problem (i.e. problems related to sexual behavior, substance abuse, mental or physical health, and/or family relationships, etc.), unless properly licensed and authorized to do so;

- S. talking to a student about problems that would normally be discussed with adults (i.e. marital issues);
- T. being alone with a student behind closed doors without a legitimate educational purpose;
- U. telling a student "secrets" and having "secrets" with a student;
- V. other similar activities or behavior.

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Inappropriate boundary invasions are prohibited and must be reported promptly to one of the District Compliance Officers, as designated in this policy, the Building Principal or the Superintendent.

Religious (Creed) Harassment

Prohibited religious harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's religion or creed and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's religious tradition, clothing, or surnames, and/or involves religious slurs.

National Origin/Ancestry Harassment

Prohibited national origin/ancestry harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's national origin or ancestry and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's national origin or ancestry, such as negative comments regarding customs, manner of speaking, language, surnames, or ethnic slurs.

Age Harassment

Prohibited age-based harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's age, being over age forty (40), and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment.

Race/Color Harassment

Prohibited race/color based harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's race and/or color and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's race or color, such as racial slurs, nicknames implying stereotypes, epithets, and/or negative references regarding racial customs.

Disability Harassment

Prohibited disability harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's disability, perceived disability, or record of disability, and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's current or past disability~~disabling condition~~ or a perceived condition, such as negative comments about speech patterns, movement, physical impairments or defects/appearances, or the like. Such harassment may further occur where conduct is directed at or pertains to a person's genetic information.

Anti-Harassment Compliance Officers

The following individual(s) shall serve as the District's Anti-Harassment Compliance Officer(s) (hereinafter, "the Compliance Officer(s)" or "CO" "COs"):

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets Assistant Superintendent
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~

SchofieldWeston, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public and on the School District's website.

The Compliance Officer(s) are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding harassment.

Reports and Complaints of Harassing Conduct

The Compliance Officer(s) will be available during regular school/work hours to discuss concerns related to harassment, to assist students, other members of the District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct, or to intercede informally on behalf of the individual in those instances where concerns have not resulted in the filing of a formal complaint and where all parties are in agreement to participate in an informal process.

Compliance Officers shall accept reports of harassment directly from any member of the School District community or a Third Party or receive reports that are initially filed with an administrator, supervisor, or other District-level official. Upon receipt of a report of alleged harassment, the Compliance Officer(s) will contact the Complainant and begin either an informal or formal complaint process (depending on the request of the Complainant or the nature of the alleged harassment), or X.]the CO(s) will designate a specific individual to conduct such a process as identified in a pre-defined list of investigators. The Compliance Officer(s) will provide a copy of this policy to the Complainant and Respondent. In the case of a formal complaint, the Compliance Officer(s) will prepare recommendations for the Superintendent or will oversee the preparation of such recommendations by a designee. All Board employees must report incidents of harassment that are reported to them to the Compliance Officer within two (2) days of learning of the incident.

Any Board employee who directly observes harassment is obligated, in accordance with this policy, to report such observations to the Compliance Officer(s) within two (2) days. Additionally, any Board employee who observes an act of harassment is expected to intervene to stop the harassment, unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other Board employees and/or local law enforcement officials, as necessary, to stop the harassment. Thereafter, the Compliance Officer(s) or designee must contact the Complainant, if age eighteen (18) or older, or Complainant's parents/guardians if the Complainant is under the age eighteen (18), within two (2) days to advise of the Board's intent to investigate the alleged wrongdoing.

Members of the School District community ~~and third parties, which includes all staff,~~ along with Third Parties are encouraged to promptly report incidents of harassing conduct to an administrator, supervisor or other District official so that the Board may address the conduct before it becomes severe, pervasive, or persistent. Any administrator, supervisor, or other District official who receives such a ~~report/complaint~~ shall file it with the ~~District's~~ Compliance Officer within two (2) days of receiving the report of harassment at his/her first opportunity.

Members of the School District community ~~and Third Parties~~ ~~or third parties~~ who believe they have been harassed by another member of the School District community or a ~~Third Party~~ ~~third party~~ are entitled to utilize the Board's complaint process that is set forth below. Initiating a complaint, whether formally or informally, will not adversely affect the ~~Complainant's~~ ~~complaining individual's~~ employment unless the complaining individual makes the complaint maliciously or with the knowledge that it is false.

Reporting procedures are as follows:

- A. Any employee who believes s/he has been the victim of harassment prohibited under this policy is encouraged to report the alleged harassment to the appropriate school official as identified in D below.
- B. Teachers, administrators, and other District officials who have knowledge of or receive notice that an employee has or may have been the victim of harassment prohibited under this policy shall immediately report the alleged harassment to the appropriate school official as defined in D below.
- C. Any other person with knowledge or belief that an employee has or may have been the victim of harassment prohibited by this policy shall be encouraged to immediately report the alleged acts to an appropriate school official as identified in D below.
- D. Appropriate District officials are as follows:

1. Any complaint under this policy shall be reported to the District's Compliance Officer unless the complaint is regarding the Compliance Officer. In such cases, the complaints shall be reported to the Superintendent, who will coordinate with the other appointed/designated CO, or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO. ~~for such complaints.~~
 2. Any complaint under this policy regarding the Superintendent or Board Member that is received by the District Compliance Officer shall be referred to the Board's legal counsel, who shall assume the role of the District Compliance Officer for such complaints.
- E. The reporting party or Complainant shall be encouraged to use a report form available from the Principal of each building or available from the District office, but oral reports shall be considered complaints as well. Use of formal reporting forms shall not be mandated. However, all oral complaints shall be reduced to writing. Further, nothing in this policy shall prevent any person from reporting harassment directly to the Superintendent or other supervisory employee.
- F. To provide individuals with options for reporting harassment to an individual of the gender with which they feel most comfortable, the District shall designate both a male and a female District Compliance Officer.

If during an investigation of alleged bullying, aggressive behavior, and/or harassment in accordance with Policy 5517.01 - Bullying, the Principal believes that the reported misconduct may have created a hostile work environment and may have constituted discriminatory harassment based on a Protected Class, the Principal shall report the act of bullying, aggressive behavior and/or harassment to the Compliance Officer(s) who shall investigate the allegation in accordance with this policy. If the alleged harassment involves Sexual Harassment as defined by Policy 2266, the matter will be investigated in accordance with the grievance process and procedures outlined in Policy 2266. While the Compliance Officer investigates the allegation, or the matter is being addressed pursuant to Policy 2266, the Principal shall suspend the Policy 5517.01 investigation to await the Compliance Officer's written report or the determination of responsibility pursuant to Policy 2266. The Compliance Officer shall keep the Principal informed of the status of the Policy 1662 investigation and provide the Principal with a copy of the resulting written report. Likewise, the Title IX Coordinator will provide the Principal with the determination of responsibility that results from the Policy 2266 grievance process.

~~A CO will be available during regular school/work hours to discuss concerns related to harassment, to assist students, other members of the School District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct.~~

~~The COs are assigned to accept complaints of harassment directly from any member of the School District community or a visitor to the District or to receive complaints that are initially filed with a school building administrator. Upon receipt of a complaint either directly or through a school building administrator, a CO will begin either an investigation or the CO will designate a specific individual to conduct such a process. The CO will prepare recommendations or will oversee the preparation of such recommendations. All members of the School District community should report incidents of harassment that are reported to them to the CO within two (2) business days of learning of the incident.~~

Investigation and Complaint Procedure

Except for Sexual Harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Program or Activities, a Any employee or other member of the School District community or Third Party (e.g., visitor to the District) who believes that they have/s/he has been subjected to harassment or has witnessed harassment of another may seek resolution of the his/her complaint through the procedures ~~as~~ described below. The complaint process involves an investigation of the Complainant's claims of harassment or retaliation and a process for rendering a decision regarding whether the charges are substantiated. Further, a process for investigating claims of harassment and a process for rendering a decision regarding whether the claim of harassment was substantiated are set forth below.

~~Once the complaint process begins, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) business days of the complaint being received).~~

The procedures set forth below are not intended to interfere with the rights of any individual to pursue a complaint of harassment or retaliation with the United States Department of Education Office for Civil Rights ("OCR"), the Wisconsin Equal Rights Division, and/or Equal Employment Opportunity Commission ("EEOC"). The Chicago Office of the OCR can be reached at John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL 60604; Telephone: 312-730-1560; FAX: 312-730-1576; TDD: 800-877-8339; Email: OCR.Chicago@ed.gov; Web: <http://www.ed.gov/ocr>.

Complaint Procedure

A Complainant ~~An individual who believes s/he has been subjected to harassment hereinafter referred to as the "Complainant,"~~ who alleges harassment based on a protected class or retaliation may file a complaint, either orally or in writing: 1) with a teacher, Principal, 2) directly to one of the 7 COs, or 3) to the Superintendent, or other supervisory employee. As noted above, any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall

assume the role of the CO for such complaints. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who ~~may will consult, in consultation~~ with the other ~~appointed/designated CO~~, if any, ~~and if necessary~~ ~~appoint/designate another individual to serve in the role of CO~~ ~~assume the role of the CO~~ for ~~such a~~ complaint ~~regarding a CO~~.⁷⁵

Due to the sensitivity surrounding complaints of harassment ~~and retaliation~~, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a complaint within thirty (30) ~~calendar~~ days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a Principal, Superintendent, or other supervisory employee, either orally or in writing, about any complaint of discrimination or retaliation, that employee must report such information to the CO within two (2) ~~business~~ days.

Throughout the course of the process as described herein, the CO should keep the parties ~~reasonably~~ informed of the status of the investigation and the decision-making process.

All written complaints must include the following information to the extent ~~known it is available~~: the identity of the ~~Respondent individual believed to have engaged in, or be actively engaging in, harassment~~; a detailed description of the facts upon which the complaint is based ~~(i.e., when, where, and what occurred)~~; ~~and~~ a list of potential witnesses; ~~and the resolution sought by the Complainant~~.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the CO shall ask for such details in an oral interview. Thereafter the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken in the investigatory phase to protect the Complainant from further harassment or retaliation including but not limited to a change of work assignment or schedule for the Complainant and/or the ~~Respondent alleged harasser~~. In making such a determination, the CO should consult the Complainant to assess ~~whether the individual agrees with his/her position to~~ the proposed action. If the Complainant is unwilling to consent to the proposed change, the CO may still take whatever actions ~~deemed/s/he deems~~ appropriate in consultation with the Superintendent. No temporary arrangements shall be disciplinary to either the ~~C~~omplainant or ~~R~~espondent.

Within two (2) ~~business~~ days of receiving a complaint, the CO will inform the ~~Respondent individual alleged to have engaged in the harassing or retaliatory conduct, hereinafter referred to as the "Respondent"~~, that a complaint has been received.

The Respondent is not entitled to receive a copy of any written complaint unless the CO determines it is appropriate to do so; however, the Respondent will be informed about the nature of the allegations. The CO shall inform the Respondent of the requirements of this policy, which may include providing the Respondent with a copy of this policy or information about where to find it. Respondent shall be afforded the opportunity to submit a written response to the complaint. The CO shall inform the Respondent of the Respondent's deadline to provide the CO with the written response to the allegations in the complaint.

~~Within five (5) days of receiving the complaint, the CO will initiate an investigation by at a minimum confirming receipt of the complaint with the Complainant and informing the Complainant of the investigation process.~~

~~Investigations shall be completed promptly. What constitutes promptness will depend on the complexity of the issues, the number of incidents or factual elements, the number of witnesses and documents to be consulted, and the availability of witnesses and other evidence. The CO shall keep the Complainant reasonably informed of the investigation's progress. -[END OF OPTIONS]~~

~~Within five (5) business days of receiving the complaint, the CO will initiate a formal investigation to determine whether the Complainant has been subject to offensive conduct/harassment.~~

~~Although certain cases may require additional time, the CO will attempt to complete an investigation into the allegations of harassment within fifteen (15) calendar days of receiving the formal complaint.~~ The investigation will include:

- A. interview(s) with the Complainant;
- B. interview(s) with the ~~R~~espondent;
- C. interviews with any other witnesses who ~~may~~ reasonably ~~may~~ be expected to have any information relevant to the allegations, as determined by the CO;
- D. consideration of any documentation or other evidence presented by the Complainant, ~~R~~espondent, or any other witness which is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO ~~or designee~~ shall prepare and deliver a written report to the Superintendent that summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definition of harassment as provided in this policy and State and Federal law as to whether the ~~Respondent engaged in harassment of or~~

retaliation toward the Complainant~~Complainant has been subjected to harassment~~. The CO's recommendations must be based upon the totality of the circumstances, including the ages and maturity levels of those involved. In determining if discriminatory harassment or retaliation occurred, a preponderance of evidence standard will be used. 76

The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.

In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation, the CO may in consultation with the Superintendent or Board President, if the matter involves the Superintendent engage outside legal counsel to conduct the investigation consistent with this policy.

Absent extenuating circumstances, within five (5) ~~business~~ days of receiving the report of the CO, the Superintendent must either issue a written final decision regarding whether or not the complaint of harassment has been substantiated or request further investigation. A copy of the Superintendent's final decision will be delivered to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within five (5) ~~business~~ days. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above.

If the Superintendent determines the Respondent engaged in harassment of or retaliation toward the Complainant, the Superintendent must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the harassment or retaliation. The corrective action should be reasonable, timely, age-appropriate, effective, and tailored to the specific situation.

The decision of the Superintendent shall be final. If the investigation results in disciplinary action, the employee subject to discipline is entitled to file a grievance pursuant to Board Policy 3340. Nothing in this policy shall be construed to prevent an employee from bringing a complaint before the Equal Employment Opportunity Commission or the Wisconsin Equal Rights Division.

The Board reserves the right to investigate and resolve a complaint or report of harassment regardless of whether the member of the School District community or Third Party alleging the harassment pursues the complaint. The Board also reserves the right to have the formal complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board.

The parties may be represented, at their own cost, at any of the above-described meetings/hearings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint procedure is not a prerequisite to the pursuit of other remedies.

All timelines pertinent to the investigation process are intended to be guidelines to assure that the investigation proceeds with all deliberate efficiency. Failure of the CO to meet any specific timeline does not invalidate the investigation or provide a defense to the allegations.

Privacy/Confidentiality

The ~~School~~District will employ reasonable efforts to protect the rights of the Complainant, the Respondent(s), and all the witnesses as much as possible, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery or disclosure obligation in an investigation of harassment. The School District will respect the privacy of the Complainant, the Respondent, and all witnesses in a manner consistent with the School District's legal obligations under State and Federal law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided with the Complainant's identity.~~All Complainants proceeding through the formal investigation process should be advised that their identities may be disclosed to the respondent.~~

During the course of an investigation, the CO will determine whether confidentiality during the investigation process is necessary to protect the interests and reputations of those involved and/or to protect the integrity of the investigation and if so, shall instruct all members of the School District community and third parties who are interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of a harassment investigation is expected not to disclose any information that is learned or provided~~s/he learns or that s/he provides~~ during the course of the investigation.

Directives During Investigation

The CO may recommend to the Superintendent placing any employee involved in an investigation under this Policy on administrative leave pending resolution of the matter. If the Superintendent is the Respondent, the CO shall make such recommendation to the Board. Administrative leave may be appropriate in situations in which protecting the safety of any individual or the integrity of the investigation necessitates such action.

The CO shall determine whether any witnesses in the course of an investigation should be provided a *Garrity* warning apprising the person of his/her obligations to answer questions truthfully and honestly while preserving the right against self-incrimination in the context of any resulting criminal investigation or prosecution.

Every employee interviewed in the course of an investigation is required to provide truthful responses to all questions. Failure to do so may result in disciplinary action.

Remedial Action Sanctions and Monitoring

~~The Board shall vigorously enforce its prohibitions against harassment by taking appropriate action reasonably calculated to stop the harassment and prevent further such harassment.~~

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to because of the discrimination, or other appropriate action.

The Board may appoint an individual, who may be an employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against harassment/retaliation by taking appropriate action reasonably calculated to stop the harassment and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee. All disciplinary action will be taken in accordance with applicable law.

When imposing discipline, the Superintendent shall consider the totality of the circumstances. In those cases where harassment is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior disciplinary action has been taken against the Respondent, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its reoccurrence, and remedy its effects.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging harassment/retaliation or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made by any Federal or State civil rights law, or because that individual made a report, formal complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Allegations Constituting Criminal Conduct

If the CO has reason to believe that the Complainant has been the victim of criminal conduct, such knowledge should be reported to local law enforcement. After such report has been made, the Superintendent shall be advised that local law enforcement was notified.

If the Complainant has been the victim of criminal conduct and the accused is the Superintendent, such knowledge should be reported by the CO to local law enforcement. After such report has been made, the Board Attorney shall be advised that local law enforcement was notified.

Any reports made to local law enforcement shall not terminate the COs obligation and responsibility to continue to investigate a complaint of harassment. While the COs may work cooperatively with outside agencies to conduct concurrent investigations, the

harassment investigation shall not be stopped due to the involvement of outside agencies without good cause after consultation with the Superintendent.

Reprisal

Submission of a good faith complaint or report of harassment will not affect the Complainant's or reporter's work status or work environment. However, the Board also recognizes that false or fraudulent claims of harassment or false or fraudulent information about such claims may be filed. The Board reserves the right to discipline any person filing a false or fraudulent claim of harassment or false or fraudulent information about such a claim.

The District will discipline or take appropriate action against any member of the School District community who retaliates against any person who reports an incident of harassment prohibited by this policy or participates in a proceeding, investigation, or hearing relating to such harassment. Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment.

Miscellaneous

The District shall conspicuously post a notice including this policy against harassment in each school in a place accessible to the School District community and members of the public. This notice shall also include the name, mailing address, and telephone number of the COs, the name, mailing address, and telephone number of the State agency responsible for investigating allegations of discrimination in educational employment, and the mailing address and telephone number of the United States Equal Opportunity Employment Commission.

A link to this policy and any related administrative guidelines shall appear in the employee handbook and a copy shall be made available upon request of employees and other interested parties.

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of harassment. The Superintendent shall provide appropriate information to all members of the School District community related to the implementation of this policy and shall provide training for District staff at such times as the Board in consultation with the Superintendent determines is necessary or appropriate.

The Board will respect the privacy of the Complainant, the individuals against whom the complaint is filed, and the witnesses as much as practicable, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery, disclosure, or other legal obligations.

Retention of Investigatory Records and Materials

The CO(s) is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all ~~information,~~ documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include~~including,~~ but are not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;
- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;
- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
- F. all documentary evidence;
- G. e-mails, texts, or social media posts pertaining to the investigation;
- H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
- I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;

- J. dated written determinations to the parties;
- K. dated written descriptions of verbal notifications to the parties;
- L. written documentation of any supportive interim measures offered and/or provided to Complainant and/or the Respondent/Complainants, including no contact orders issued to both parties, the dates issued, and the dates the parties acknowledged receipt; and
- M. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects.
- N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Code of Conduct and/or Employee Handbooks);
- O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy.; ~~REMINDER: Documentation of training should be maintained regardless of whether there is an investigation of an alleged violation of this policy. It is best practice to maintain a log of all staff members who participate in a training, along with the date, time and location of the training, and a copy of the materials reviewed and/or presented during the training.]]~~
- ~~{DRAFTING NOTE: The following options should be selected if the district concludes that the following items are not adequately encompassed in the preceding paragraphs.}~~
- Q. ~~documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms;)(~~
- R. ~~copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy;)(~~
- S. ~~) copies of any notices sent to the Complainant and the Respondent in advance of any interview, meeting, or hearing;)(~~
- T. ~~copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.)(~~

The information, documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The information, documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

Revised 4/24/19

T.C. 6/22/20

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Legal

111.31, 118.195, 118.20, Wis. Stats.
29 U.S.C. 621 et seq., Age Discrimination in Employment Act of 1967
29 U.S.C. 794, Rehabilitation Act of 1973
42 U.S.C. 1983
42 U.S.C. 2000d et seq., Title VI of the Civil Rights Act of 1964
42 U.S.C. 2000e et seq., Title VII of the Civil Rights Act of 1964
42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act
42 U.S.C. 6101 et seq., Age Discrimination Act of 1975
42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended
29 C.F.R. Part 1635
National School Boards Association Inquiry and Analysis - May 2008

Cross References

[1662F - Discrimination/Harassment Complaint Form](#)

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	NONDISCRIMINATION AND ACCESS TO EQUAL EDUCATIONAL OPPORTUNITY
Code	po2260
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	11/18/2020

2260 - **NONDISCRIMINATION AND ACCESS TO EQUAL EDUCATIONAL OPPORTUNITY**

The Board is committed to providing an equal educational opportunity for all students in the District.

The Board does not discriminate on the basis of race, color, religion, national origin, ancestry, creed, pregnancy, marital status, parental status, sexual orientation, sex, (including **trans**gender status, change of sex or gender identity), or physical, mental, emotional, or learning disability ("Protected Classes") in any of its student program and activities. This policy is intended to support and promote nondiscriminatory practices in all District and school activities, particularly in the following areas:

- A. use of objective bases for admission to any school, class, program, or activity;
- B. prohibition of harassment towards students and procedures for the investigation of claims (see Policy 5517);
- C. use of disciplinary authority, including suspension and expulsion authority;
- D. administration of gifts, bequests, scholarships and other aids, benefits, or services to students from private agencies, organizations, or persons;
- E. selection of instructional and library media materials in a nondiscriminatory manner and that reflect the cultural diversity and pluralistic nature of American society;
- F. design and implementation of student evaluation practices, materials, and tools, but not at the exclusion of implementing techniques to meet students' individual needs;
- G. design and configuration of facilities;
- H. opportunity for participation in extra-curricular and co-curricular activities provided that separate programs for male and female students may be available provided comparable activities are made available to all in terms of type, scope, and District support; and
- I. the school lunch program and other school-sponsored food service programs.

The Board is also committed to equal employment opportunity in its employment policies and practices as they relate to students. The Board's policies pertaining to employment practices can be found in Policy 1422, Policy 3122, and Policy 4122 - Nondiscrimination and Equal Employment Opportunity.

[The District will identify, evaluate, and provide a free appropriate public education to students with disabilities who are determined eligible for special education and related services under the Individuals with Disabilities Education Act \(IDEA\) or Section 504 of the](#)

Rehabilitation Act of 1973 (Section 504).

The District's educational programs include the academic and nonacademic setting. Each qualified student with a disability shall be educated with students without disabilities to the maximum extent appropriate. In the nonacademic setting, a student with a disability shall participate with students without disabilities to the maximum extent appropriate.

Notice of the Board's policy on nondiscrimination and the identity of the District's Compliance Officer(s) (see below) will be published on the District's website, posted throughout the District, and included in the District's recruitment statements or general information publications.

Principal's Responsibilities

Each Principal shall verify that the procedures used with students and parents for selection of and participation in any part of the District's academic, co-curricular, or extra-curricular programs do not discriminate on the basis of the Protected Classes.

Superintendent's Responsibilities

In furtherance of the aforesaid goal, the Superintendent shall:

A. Curriculum Content

1. review current and proposed courses of study and textbooks to detect any bias based upon the Protected Classes ascertaining whether or not supplemental materials, singly or taken as a whole, fairly depict ~~those~~ the Protected Classes ~~contribution of both sexes, various races, ethnic groups, etc.~~ toward the development of human society;
2. provide that necessary programs are available for students with limited use of the English language;

B. Staff Training

develop an ongoing program of staff training and in-service training for school personnel designed to identify and solve problems of bias based upon the Protected Classes in all aspects of the program;

C. Student Access

1. review current and proposed programs, activities, facilities, and practices to ensure that all students have equal access thereto and are not segregated on the basis of the Protected Classes in any duty, work, play, classroom, or school practice, except as may be permitted under State regulations;
2. verify that facilities are made available in a non-discriminatory fashion, in accordance with Board Policy 7510 - Use of District Facilities, for non-curricular student activities that are initiated by parents or other members of the community, including but not limited to any group officially affiliated with the Boy Scouts of America or any other youth group listed in Title 36 of the United States Code as a patriotic society;
3. verify that the educational programs of this District are accessible to all students;
All programs need to be designed and scheduled so the location or nature of the facility or area will not deny an otherwise qualified student with a disability the opportunity to participate in the academic or other school programs on the same basis as students without disabilities.
4. require that service animals for students who require this type of assistance shall be permitted access to all facilities, programs, and events of the District.

D. District Support

require that like aspects of the District program receive like support as to staff size and compensation, purchase and maintenance of facilities and equipment, access to such facilities and equipment, and related matters;

E. Student Evaluation

verify that tests, procedures, ~~and/or~~ guidance and counseling materials, which are designed to evaluate student progress, rate aptitudes, analyze personality, or in any manner establish or tend to establish a category by which a student may be judged, are not differentiated or stereotyped on the basis of the Protected Classes.

Definitions

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

Complainant: is the individual who alleges, or is alleged, to have been subjected to unlawful discrimination/retaliation, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged discrimination/retaliation.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Military status: refers to a person's status in the uniformed services, which includes the performance of duty on a voluntary or involuntary basis in a uniformed service, including active duty, active duty for training, initial active duty for training, inactive duty for training, and full-time National Guard duty. It also includes the period of time for which a person is absent from school for the purpose of an examination to determine the fitness of the person to perform any duty listed above.

Respondent: is the individual who has been alleged to have engaged in unlawful discrimination/retaliation, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged discrimination/retaliation.

School District community: means students and Board employees (i.e., administrators, and professional and support staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties: include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

The Superintendent shall ~~appoint and~~ publicize the name of the compliance officer(s) who is/are responsible for coordinating the District's efforts to comply with the applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding discrimination or equal access. The Compliance Officer(s) also verify that proper notice of nondiscrimination for Title II of the Americans with Disabilities Act (as amended), Title VI and VII of the Civil Rights Act of 1964, ~~Title IX of the Education Amendment Act of 1972~~, Section 504 of the Rehabilitation Act of 1973 (as amended), is provided to students, their parents, staff members, and the general public.

~~[] The Board is committed to educating (or providing for the education of) each qualified person with a disability with persons who are not disabled to the maximum extent appropriate. Generally, the District will place a person with a disability in the regular educational environment unless it is demonstrated that the education of the person in the regular environment, even with the use of supplementary aids and services cannot be achieved satisfactorily. If the Board operates a separate class or facility under Section 504 that is identifiable as being for persons with disabilities, the facility, program, and activities and services must be comparable to the facilities, programs, and activities and services offered to students without a disability.~~

~~The Superintendent shall attempt annually to identify children with disabilities, ages 3—21, who reside in the District but do not receive a public education.~~

In addition, ~~the Superintendent/s/he~~ shall establish procedures to identify students who are Limited English Proficient, including immigrant children and youth, to assess their ability to participate in District programs, and develop and administer a program that meets the English language and academic needs of these students. This program shall include procedures for student placement, services, evaluation, and exit guidelines and shall be designed to provide students with effective instruction that leads to academic achievement and timely acquisition of proficiency in English. As a part of this program, the District will evaluate the progress of students in achieving English language proficiency in the areas of listening, speaking, reading and writing, on an annual basis. ~~.) The Superintendent is responsible for verifying that a concentration of students who are Limited English Proficient English Learner (EL) (LEP) in one or more programs is not the result of discrimination.~~

Reporting Procedures

~~Students and District employees are required, and all other members of the District community and Third Parties~~ ~~Students, parents and all other members of the School District community~~ are encouraged to promptly report suspected violations of this policy to ~~ana~~ ~~teacher or~~ administrator, supervisor, or other District official so that the Board may address the conduct. Any teacher, ~~or~~ administrator, supervisor, or other District employee or official who receives such a complaint shall file it with the District's Compliance Officer ~~within two (2) days~~ ~~at his/her first opportunity~~. **[NOTE: While students are advised to report discrimination/retaliation to administrators, supervisors, or other District officials, the Board recognizes that some students may report discrimination/retaliation to a teacher. When a teacher receives such a report, the teacher must file it with the CO as indicated above.]**

Students who believe they have been denied equal access to District educational opportunities in a manner inconsistent with this policy may initiate a complaint and the investigation process that is set forth below. Initiating a complaint will not adversely affect the complaining individual's participation in educational or extra-curricular programs unless the complaining individual makes the complaint maliciously or with the knowledge that it is false. 84

Members of the District community, which includes students or Third Parties, who believe they have been discriminated/retaliated against are entitled to utilize the complaint process set forth below. Initiating a complaint, whether formally or informally, will not adversely affect the Complainant's employment or participation in educational or extra-curricular programs. While there are no time limits for initiating complaints under this policy, individuals should make every effort to file a complaint as soon as possible after the conduct occurs while the facts are known and potential witnesses are available.

If during an investigation of alleged bullying, aggressive behavior and/or harassment in accordance with Policy 5517.01 - Bullying, the Principal believes that the reported misconduct may constitute unlawful discrimination based on a Protected Class, the Principal shall report the act to one of the COs, who shall investigate the allegation in accordance with this policy. While the CO investigates the allegation, the Principal shall suspend the Policy 5517.01 investigation to await the CO's written report. The CO shall keep the principal informed of the status of the Policy 2260 investigation and provide the Principal with a copy of the resulting written report.

The COs will be available during regular school/work hours to discuss concerns related to discrimination/retaliation. COs shall accept reports of discrimination/retaliation directly from any member of the District community or a Third Party and reports that initially are made to another District employee. Upon receipt of a report of alleged discrimination/retaliation, the CO will contact the Complainant and begin either an informal or formal complaint process (depending on the Complainant's request and the nature of the alleged discrimination/retaliation) or designate a specific individual to conduct such a process.

The CO will provide a copy of this policy to the Complainant and the Respondent. In the case of a formal complaint, the CO will prepare recommendations for the Superintendent or oversee the preparation of such recommendations by a designee. All members of the District community must report incidents of discrimination/retaliation that are reported to them to the CO within two (2) days of learning of the incident/conduct.

Any District employee who directly observes discrimination/retaliation of a student is obligated, in accordance with this policy, to report such observations to one of the COs within two (2) days. Additionally, any District employee who observes an act of unlawful discrimination/retaliation is expected to intervene to stop the misconduct unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other District employees and/or local law enforcement officials, as necessary, to stop the misconduct. Thereafter, the CO/designee must contact the Complainant if age eighteen (18) or older or the Complainant's parents/guardians if the student is under the age of eighteen (18) within two (2) days to advise of the Board's intent to investigate the alleged wrongdoing.

Title IX Complaint Coordinators/District Compliance Officers (hereinafter referred to as the "COs")

The Board designates the following individuals to serve as the District's CO's:

Dr. Kimberly Hall
 Director of Human Resources
 1699 Schofield Ave., Suite 300 ~~6300 Alderson Street~~
 Schofield ~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Dr. Jeff Lindell
 Director of Student Services
 1699 Schofield Ave., Suite 300 ~~6300 Alderson Street~~
 Schofield ~~Weston~~, WI 54476
 715-359-4221 ext. 1351
 jlindell@dce.K12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public and on the School District's web site.

A CO will be available during regular school/work hours to discuss concerns related to student discrimination in educational opportunities under this policy.

Investigation and Complaint Procedure

The CO shall investigate any complaints brought under this policy. Throughout the course of the process as described herein, the CO should keep the parties reasonably informed of the status of the investigation and the decision-making process.

All complaints must include the following information to the extent ~~known it is available~~: a description of the alleged violation, the identity of the ~~Respondent individual(s) believed to have engaged in, or to be actively engaging in, conduct in violation of this policy, if any~~; a detailed description of the facts upon which the complaint is based ~~(i.e., when, where, and what occurred)~~; ~~and~~ a list of 85 potential witnesses; ~~and the resolution sought by the Complainant.~~

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the CO shall ask for such details in an oral interview. Thereafter the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the ~~reported charge report~~ by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken during the investigatory phase to protect the Complainant from further loss of educational opportunity, including but not limited to a change of ~~work assignment or~~ class schedule for the Complainant, tentative enrollment in a program, or other appropriate action. In making such a determination, the CO should consult the ~~Complainant to assess whether the individual agrees with the proposed action. If the Complainant is unwilling to consent to the proposed change, the CO still may take whatever actions are deemed appropriate in consultation with the Superintendent. The Complainant should be notified of any proposed action prior to such action being taken.~~

As soon as appropriate in the investigation process, the CO will inform ~~the Respondent any individual named by the Complainant in connection with an alleged violation of this policy~~, that a complaint has been received. The person(s) must also be provided an opportunity to respond to the complaint.

All investigations shall be commenced as soon as practicable upon receipt of a complaint and concluded as expeditiously as feasible, in consideration of the circumstances, while taking measures to complete a thorough investigation. The complaining party shall be notified in writing of receipt of the complaint within forty-five (45) days of the complaint and shall reach a determination concerning the complaint within ninety (90) days of receipt unless additional time is agreed to by the complaining party.

The investigation will include:

- A. interviews with the Complainant;
- B. interviews with ~~the Respondent any persons named in the complaint~~;
- C. interviews with any other witnesses who ~~may~~ reasonably ~~may~~ be expected to have any information relevant to the allegations, as determined by the CO;
- D. consideration of any documentation or other evidence presented by the Complainant, Respondent, or any other witness which is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO ~~or designee~~ shall prepare and deliver a written report to the Superintendent which summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definitions in this Policy, as well as in State and Federal law as to whether the Complainant has been denied access to educational opportunities on the basis of one of the protected classifications, based on a preponderance of evidence standard. The CO's recommendations must be based upon the totality of the circumstances, including the ages and maturity levels of those involved.

The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.

In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation, the CO may in consultation with the Superintendent or Board President, ~~if the matter involves the Superintendent~~, engage outside legal counsel to conduct the investigation consistent with this policy.

Absent extenuating circumstances, within ~~five (5) ten (10) business~~ days of receiving the report of the CO ~~or designee~~, the Superintendent ~~must~~ either ~~must~~ issue a ~~written final~~ decision regarding ~~whether the charges have been substantiated the complaint~~ or request further investigation. A copy of the Superintendent's final decision will be delivered to ~~both the Complainant and Respondent (-) and to the Respondent, if any [END OF OPTION]~~. The Superintendent may redact information from the decision in the event the release of information raises concerns regarding the integrity of the complaint or investigation process. The Board authorizes the Superintendent to consult with legal counsel to determine the extent to which information in an investigation report must be provided to either the Complainant or Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within ~~five (5) ten (10) business~~ days. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above. The decision of the Superintendent will be reviewed by the Board upon request.

If the Complainant feels that the decision does not adequately address the complaint s/he may appeal the decision to the State Superintendent of Public Instruction by submitting a written request to the Wisconsin Department of Public Instruction, Pupil Nondiscrimination Program, or by contacting the DPI Pupil Nondiscrimination Program at (608) 267-9157. Any person, including the Respondent in a complaint, who is subject to disciplinary action up to and including termination as a result of a complaint may choose to file a grievance utilizing the District's grievance procedure as outlined in Policy 3340 or Policy 4340. 86

The Board reserves the right to investigate and resolve a complaint or report regardless of whether the member of the School District community or third party chooses to pursue the complaint. The Board also reserves the right to have the complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board.

The parties may be represented, at their own cost, at any of the above-described meetings/hearings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint process is not a prerequisite to the pursuit of other remedies.

Additional School District Action

If the evidence suggests that any conduct at issue violates any other policies of the Board, is a crime, or requires mandatory reporting under the Children's Code (Sec. 48.981, Wis. Stat.) (Policy 8462), or threats of violence (Policy 8462.01), the CO or Superintendent shall take such additional actions as necessary and appropriate under the circumstances, which may include a report to the appropriate social service and/or law enforcement agency charged with responsibility for handling such investigations.

Privacy/Confidentiality

The District will make reasonable efforts to protect the privacy of any individuals involved in the investigation process. Confidentiality cannot be guaranteed, however. Additionally, the Respondent must be provided the Complainant's identity. All Complainants proceeding through the investigation process should be advised that as a result of the investigation, allegations against individuals may become known to those individuals, including the Complainant's identity.

During the course of an investigation, the CO or designee will instruct all members of the School District community and third parties who are interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of an investigation is expected not to disclose any information that is learned or provided s/he learns or that s/he provides during the course of the investigation.

Remedial Action and Monitoring

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken because of the discrimination, the opportunity to complete assignments missed due to absences related to the discrimination, or other appropriate action.

The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against discrimination/retaliation by taking appropriate action reasonably calculated to stop and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and the terms of any relevant codes of conduct.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the ages and maturity level of any student involved. In those cases where discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior disciplinary action has been taken against the Respondent, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its reoccurrence, and remedy its effects.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging harassment/retaliation or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made unlawful by any Federal or State civil rights law, or because that individual made a report, formal complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of discriminatory practices. The Superintendent shall provide appropriate information to all members of the School District community related to the implementation of this policy and shall provide training for District students and staff where appropriate. All training, as well as all information, provided regarding the Board's policy and discrimination in general, will be age and content appropriate.

Retention of ~~Public Records, Student Records, and~~ Investigatory Records and Materials

The Compliance Officer(s) is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all information, documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and received as part of an investigation, including but not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;
- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;
- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
- F. all documentary evidence;
- G. e-mails, texts, or social media posts related to the investigation;
- H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
- I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;
- J. dated written determinations to the parties;
- K. dated written descriptions of verbal notifications to the parties;
- L. written documentation of any supportive interim measures offered and/or provided to Complainant and/or the Respondent/complainants, including no contact orders issued to both parties, the dates issued, and the dates the parties acknowledged receipt; and
- M. documentation of all actions, both individual and systemic, taken to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects.
- N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with

respect to the subject of this policy (e.g., Student Code of Conduct and/or Employee Handbooks);

- O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy.; REMINDER: Documentation of training should be maintained regardless of whether there is an investigation of an alleged violation of this policy. It is best practice to maintain a log of all staff members who participate in a training, along with the date, time and location of the training, and a copy of the materials reviewed and/or presented during the training. [DRAFTING NOTE: The following options should be selected if the District concludes that the following items are not adequately encompassed in the preceding paragraphs.]
- Q. ~~documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms);~~(
- R. ~~copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy);~~(
- S. ~~copies of any notices sent to the Complainant and the Respondent in advance of any interview, meeting, or hearing);~~(
- T. ~~copies of any notices sent to the complainant and alleged perpetrator in advance of any interview or hearing);~~(
- U. ~~copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.);~~(

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The information, documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The information, documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

Revised 10/25/17

Revised 4/24/19

T.C. 6/22/20

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Legal	118.13 Wis. Stats. P.I. 9, Wis. Adm. Code P.I. 41, Wis. Adm. Code Fourteenth Amendment, U.S. Constitution 20 U.S.C. 1701 et seq., Equal Educational Opportunities Act of 1974 20 U.S.C. 7905, Boy Scouts of America Equal Access Act 29 U.S.C. 794, Section 504 of the Rehabilitation Act of 1973, as amended 42 U.S.C. 6101 et seq., Age Discrimination Act of 1975 42 U.S.C. 2000 et seq., Civil Rights Act of 1964 42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act 42 U.S.C. 12101 et seq., The Americans with Disabilities Act of 1990, as amended 29 C.F.R. Part 1635, The GINA Regulations 34 C.F.R. Part 110, The Age Discrimination Act Regulations Guidelines for Vocational Education Programs, Department of Education, Office for Civil Rights, March 21, 1979
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Book	Policy Manual
Section	Second Reading by Board
Title	SECTION 504/ADA PROHIBITION AGAINST DISCRIMINATION BASED ON DISABILITY
Code	po2260.01
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	10/21/2020

2260.01 - SECTION 504/ADA PROHIBITION AGAINST DISCRIMINATION BASED ON DISABILITY

Pursuant to Section 504 of the Rehabilitation Act of 1973 ("Section 504"), the Americans with Disabilities Act of 1990, as amended ("ADA"), and the implementing regulations (collectively "Section 504/ADA"), no otherwise qualified individual with a disability shall, ~~solely by reason of his/her disability,~~ be excluded from participation in, ~~be~~ denied the benefits of, or ~~be~~ subjected to discrimination under any program or activity receiving Federal financial assistance solely by reason of disability. The Board does not discriminate in admission or access to, ~~or~~ participation in, ~~or~~ treatment in its programs or activities. As such, the Board's policies and practices will not discriminate against students with disabilities and the Board will make its facilities, programs, and activities accessible to qualified individuals with disabilities ~~will make accessible to qualified individuals with disabilities its facilities, programs, and activities~~. No discrimination will be knowingly permitted against any individual with a disability on the sole basis of that disability in any of the programs, activities, policies, and/or practices in the District.

Notice of the Board's policy on nondiscrimination in employment practices and the identity of the School District's Compliance Officer(s) (see below) will be published on the District's website, posted throughout the District, and included in the District's recruitment statements or general information publications.

Free Appropriate Public Education

The Board is committed to identifying, evaluating, and providing a free appropriate public education ("FAPE") to students with disabilities within its jurisdiction who are determined eligible for special education and related services under the Individuals with Disabilities Education Act ("IDEA") or Section 504, regardless of the nature or severity of their disabilities.

If a student has a physical or mental impairment that significantly limits one or more major life activities (see Definitions below), the Board shall provide the student a FAPE. An appropriate education may include regular or special education and related aids and services to accommodate the unique needs of students with disabilities. For students with disabilities who are not eligible for specially designed instruction under the IDEA, the related aids and services (including accommodations/modifications/interventions) they need in order to have their needs met as adequately as the needs of students without disabilities are met shall be delineated, along with their placement, in a Section 504 Plan (Form 2260.01A F13). Parents/guardians/custodians ("parents") are invited and encouraged to participate fully in the evaluation process and development of a Section 504 Plan. The quality of education services provided to students with disabilities shall be equal to the quality of services provided to students without disabilities.

The Board is committed to educating (or providing for the education of) each qualified student with a disability within its jurisdiction with students without disabilities to the maximum extent appropriate. Generally, the District will place a student with a disability in the general education environment unless it is demonstrated that the education of the student in the general education environment, even with the use of supplementary aids and services, cannot be achieved satisfactorily. If the District places a student in a setting other than the general education environment, it shall take into account the proximity of the alternate setting to the student's home. If the Board operates a separate class or facility that is identified as being provided for students with disabilities, the facility, program, and activities and services must be comparable to the facilities, programs, and activities and services offered to students without disabilities.

The District will provide non-academic extra-curricular services and activities in such a manner as is necessary to afford qualified students with disabilities an equal opportunity for participation in such services and activities. Nonacademic and extra-curricular services and activities may include counseling services, athletics, transportation, health services, recreational activities, special interests groups or clubs sponsored by the District, referrals to agencies that provide assistance to individuals with disabilities, and employment of students. In providing or arranging for the provision of meals and recess periods and nonacademic and extracurricular services and activities, including those listed above, the District will verify that students with disabilities participate with students without disabilities in such services and activities to the maximum extent appropriate.

In accordance with Section 504, parents and students shall be notified of their right to file an internal complaint regarding an alleged violation, misinterpretation, or misapplication of Section 504. In addition, students and their parents shall be notified of their right to file a complaint with the U.S. Department of Education's Office for Civil Rights ("OCR"). Finally, students and parents shall be advised of their right to request a due process hearing before an Impartial Hearing Officer ("IHO") regarding the identification, evaluation, or educational placement of persons with disabilities, and their right to examine relevant education records. (See also AG 2260.01B - Section 504/ADA - Complaint and Due Process Procedures).

Definitions

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

Complainant: is the individual who alleges or is alleged to have been subjected to discrimination/retaliation, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged discrimination/retaliation.

Respondent: is the individual who is alleged to have engaged in discrimination/retaliation, regardless of whether the Complainant files a formal complaint or is seeking an informal resolution to the alleged discrimination/retaliation.

District community: means students, District employees (i.e., administrators and professional and support staff), and Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties: include but are not limited to guests and/or visitors on District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with or seeking to do business with the Board, and other individuals who come in contact with members of the District community at school-related events/activities (whether on or off District property).

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Individual "An individual with a disability" means a person who has, ~~has had~~ a record of, or is regarded as having, a physical or mental impairment that substantially limits one or more major life activities.

Major Life Activities

Major life activities are functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, eating, sleeping, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, sitting, reaching, interacting with others, and working.

Major life activities also include the operation of a major bodily function, including, but not limited to, functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, hemic, lymphatic, musculoskeletal and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

Impairment That Substantially Limits a Major Life Activity

~~An impairment that is episodic in nature or in remission is considered a disability if it would substantially limit a major life activity when active.~~

The determination of whether an impairment substantially limits a major life activity must be made without regard to the ameliorative effects of mitigating measures such as medication, medical supplies, equipment or appliances, low-vision devices (not including ordinary eyeglasses or contact lenses), prosthetics (including limbs and devices), hearing aids and cochlear implants or other implantable hearing devices, mobility devices, oxygen therapy equipment or supplies, assistive technology, reasonable accommodations or auxiliary aids or services, or learned behavioral or adaptive neurological modifications.

An impairment that is episodic in nature or in remission is considered a disability if it would substantially limit a major life activity when active.

Qualified Individual with a Disability

With respect to public preschool, elementary, and secondary educational services, a qualified individual person with a disability means a student with a disability~~disabled person~~:

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- A. who is of an age during which ~~nondisabled~~ persons without disabilities are provided educational services;
- B. who is of any age during which it is mandatory under Wisconsin law to provide educational services to ~~disabled~~ persons with disabilities; or
- C. to whom the State is required to provide a free appropriate public education pursuant to the IDEA Individuals with Disabilities Education Improvement Act (IDEIA).

With respect to vocational education services, a qualified individual person with a disability means a student~~disabled person~~ with a disability who meets the academic and technical standards requisite to admission or participation in the vocational program or activity. The Board will not deny a student with disability access to its vocational education programs or courses due to architectural and/or equipment barriers, or because the student needs related aids or services to receive an appropriate education.

With respect to employment, a qualified individual with a disability means the individual satisfies the requisite skill, experience, education and other job-related requirements of the employment position the individual holds or desires and can perform the essential functions of the job in question, with or without reasonable accommodation.

Reasonable Accommodation

With respect to employment, the Board will provide a reasonable accommodation to a qualified individual who has an actual disability or who has a record of a disability, unless the accommodation would impose an undue hardship on the operation of the Board's program and/or activities. A reasonable accommodation is not required for an individual who is merely regarded as having a disability.

Facilities

No qualified person with a disability will be denied the benefits of, excluded from participation in, or otherwise subjected to discrimination under any program or activity to which Section 504/ADA applies because the District's facilities are inaccessible to or unusable by persons with disabilities.

For facilities constructed or altered after June 3, 1977, the District will comply with applicable accessibility standards. For those existing facilities constructed prior to June 3, 1977, the District is committed to operating its programs and activities so that they are readily accessible to persons with disabilities.

District Compliance Officers (hereinafter referred to as the "COs")

The following person(s) is/are designated as the District Section 504 Compliance Officer(s)/ADA Coordinator(s):

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Dr. Jeff Lindell
 Director of Student Services~~Matt Spets, Assistant Superintendent~~
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. ~~13512~~
 jlindell~~mspets~~@dce.K12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public and on the School District's website.

The COs are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding discrimination/retaliation or denial of equal access. The COs also shall verify that proper notice of nondiscrimination for Title II of the Americans with Disabilities Act (as amended), Title VI and Title VII of the Civil Rights Act of 1964, Section 504 of the Rehabilitation

Act of 1973 (as amended), and the Age Discrimination in Employment Act of 1975 is provided to staff members and the general public. A copy of each of the Acts and regulations on which this notice is based will be made available upon request from the CO and fulfill its responsibilities under Section 504 and Title II of the ADA. A copy of Section 504 and the ADA, including copies of their implementing regulations, may be obtained from the CO. 93

The CO will oversee the investigation of any complaints of discrimination based on disability, which may be filed pursuant to the Board's adopted internal complaint procedure, and will attempt to resolve such complaints.

The Board will provide for the prompt and equitable resolution of complaints alleging violations of Section 504/ADA. (See below.) The Board will further will establish and implement a system of procedural safeguards in accordance with Section 504, including the right to an impartial due process hearing, for parents of students with disabilities. Finally, students and parents will be advised of their right to request a due process hearing before an Impartial Hearing Officer (IHO) regarding the identification, evaluation or educational placement of persons with disabilities, including the right to participation by the student's parents and representation of counsel, and their right to examine relevant education records.

Training

The CO will also oversee the training of employees of the Board so that all employees understand their rights and responsibilities under Section 504 and the ADA, and are informed of the Board's policies, administrative guidelines, and practices with respect to fully implementing and complying with the requirements of Section 504/ADA.

The Board will provide in-service training and consultation to staff responsible for the education of persons with disabilities, as necessary and appropriate.

Facilities

No qualified person with a disability will, because the District's facilities are inaccessible to or unusable by persons with disabilities, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which Section 504/ADA applies.

For facilities constructed or altered after June 3, 1977, the District will comply with applicable accessibility standards. For those existing facilities constructed prior to June 3, 1977, the District is committed to operating its programs and activities so that they are readily accessible to persons with disabilities. This includes, but is not limited to, providing accommodations to parents with disabilities who desire access to their child's educational program or meetings pertinent thereto. Programs and activities will be designed and scheduled so that the location and nature of the facility or area will not deny a student with a disability the opportunity to participate on the same basis as students without disabilities.

Education

The Board is committed to identifying, evaluating, and providing a free appropriate public education ("FAPE") to students within its jurisdiction who are disabled within the definition of Section 504, regardless of the nature or severity of their disabilities.

If a student has a physical or mental impairment that significantly limits one or more major life activities, the Board will provide the student with a free appropriate public education ("FAPE"). An appropriate education may include regular or special education and related aids and services to accommodate the unique needs of students with disabilities. For disabled students who are not eligible for specially designed instruction under the Individuals with Disabilities Education Improvement Act ("IDEIA"), the related aids and services (including accommodations/modifications/interventions) they need in order to have their needs met as adequately as the needs of nondisabled students are met, shall be delineated, along with their placement, in a Section 504 Plan (Form 2260.01A F13). Parents/guardians/custodians ("parents") are invited and encouraged to participate fully in the evaluation process and development of a Section 504 Plan.

The Board is committed to educating (or providing for the education of) each qualified person with a disability who resides within the District with persons who are not disabled to the maximum extent appropriate. Generally, the District will place a person with a disability in the regular educational environment unless it is demonstrated that the education of the person in the regular environment even with the use of supplementary aids and services cannot be achieved satisfactorily. If the District places a person in a setting other than the regular educational environment, it shall take into account the proximity of the alternate setting to the person's home.

The Board will provide non-academic extracurricular services and activities in such a manner as is necessary to afford qualified persons with disabilities an equal opportunity for participation in such services and activities. Nonacademic and extracurricular services and activities may include counseling services, physical recreational athletics, transportation, health services, recreational activities, special interests groups or clubs sponsored by the District, referrals to agencies that provide assistance to persons with disabilities, and employment of students. In providing or arranging for the provision of meals and recess periods, and nonacademic and extracurricular services and activities, including those listed above, the District will verify that persons with disabilities participate with persons without disabilities in such services and activities to the maximum extent appropriate.

Reports and Complaints of Discrimination and Retaliation

Students and District employees are required, and all other members of the District community and Third Parties are encouraged, to promptly report incidents of discrimination and/or retaliation to an administrator, supervisor, or other District official so that the Board may address the conduct. Any teacher, administrator, supervisor, or other District employee or official who receives such a complaint shall file it with the CO within two (2) days. **[NOTE: While students are advised to report discrimination/retaliation to administrators, supervisors, or other District officials, the Board recognizes that some students may report discrimination/retaliation to a teacher. When a teacher receives such a report, the teacher must file it with the CO as indicated above.]**

Members of the District community, which includes students or Third Parties, who believe they have been discriminated/retaliated against are entitled to utilize the complaint process set forth below. Initiating a complaint, whether formally or informally, will not adversely affect the Complainant's employment or participation in educational or extra-curricular programs. While there are no time limits for initiating complaints under this policy, individuals should make every effort to file a complaint as soon as possible after the conduct occurs while the facts are known and potential witnesses are available.

A student and/or parent may initiate the internal complaint procedure when they believe that a violation, misapplication or misinterpretation of Section 504 has occurred. Additionally, the following procedure may be used for any disagreement with respect to actions regarding the identification, evaluation, or educational program or placement of students who are identified as having a disability or believed to have a disability pursuant to Section 504 and are not eligible under the IDEA, except in the case of disciplinary actions where the provisions of the Student Code of Conduct apply. Use of the internal complaint procedure is not a prerequisite to the pursuit of other remedies, including the filing of a complaint with the OCR or requesting an impartial due process hearing.

If during an investigation of alleged bullying, aggressive behavior and/or harassment in accordance with Policy 5517.01 - Bullying, the Principal believes that the reported misconduct may constitute discrimination based on a Protected Class, the Principal shall report the act to one of the COs, who shall investigate the allegation in accordance with this policy. While the CO investigates the allegation, the Principal shall suspend the Policy 5517.01 investigation to await the CO's written report. The CO shall keep the Principal informed of the status of the Policy 2260 investigation and provide the Principal with a copy of the resulting written report.

The COs will be available during regular school/work hours to discuss concerns related to discrimination/retaliation. COs shall accept reports of discrimination/retaliation directly from any member of the District community or a Third Party and reports that initially are made to another District employee. Upon receipt of a report of alleged discrimination/retaliation, the CO will contact the Complainant and begin either an informal or formal complaint process (depending on the Complainant's request and the nature of the alleged discrimination/retaliation) or designate a specific individual to conduct such a process.

The CO will provide a copy of this policy to the Complainant and the Respondent. In the case of a formal complaint, the CO will prepare recommendations for the Superintendent or oversee the preparation of such recommendations by a designee. All members of the District community must report incidents of discrimination/retaliation that are reported to them to the CO within two (2) days of learning of the incident/conduct.

Any District employee who directly observes discrimination/retaliation of a student is obligated, in accordance with this policy, to report such observations to one of the COs within two (2) days. Additionally, any District employee who observes an act of discrimination/retaliation is expected to intervene to stop the misconduct unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other District employees and/or local law enforcement officials, as necessary, to stop the misconduct. Thereafter, the CO/designee must contact the Complainant if age eighteen (18) or older or the Complainant's parents/guardians if the student is under the age eighteen (18) within two (2) days to advise of the Board's intent to investigate the alleged wrongdoing.

Investigation and Complaint Procedure

The CO shall investigate any complaints brought under this policy. Throughout the course of the process as described herein, the CO should keep the parties reasonably informed of the status of the investigation and the decision-making process.

All complaints must include the following information to the extent known it is available: a description of the alleged violation, the identity of the Respondent individual(s) believed to have engaged in, or to be actively engaging in, conduct in violation of this policy, if any; a detailed description of the facts upon which the complaint is based (i.e., when, where, and what occurred); and a list of potential witnesses; and the resolution sought by the Complainant.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the CO shall ask for such details in an oral interview. Thereafter the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the report by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken during the investigatory phase to protect the Complainant from further discrimination or retaliation/loss of educational opportunity, including but not limited to a change of work

~~assignment or~~ class schedule for the Complainant ~~and/or the Respondent~~; ~~tentative enrollment in a program, or other appropriate action.~~ In making such a determination, the CO should consult the **Complainant to assess whether the individual agrees with the proposed action. If the Complainant is unwilling to consent to the proposed change, the CO still may take whatever actions are deemed appropriate in consultation with the Superintendent** ~~(-) Principal (-) Superintendent~~ **[END OF OPTIONS]** ~~prior to any action being taken. The Complainant should be notified of any proposed action prior to such action being taken.~~

As soon as appropriate in the investigation process, the CO will inform any individual names by the Complainant in connection with an alleged violation of this policy, that a complaint has been received. The person(s) must also be provided an opportunity to respond to the complaint.

Within ~~two (2) five (5) business~~ days of receiving the complaint, the CO ~~or designee~~ will initiate an investigation ~~to determine whether the Complainant has been subjected to discrimination/retaliation by at a minimum confirming receipt of the complaint with the Complainant and informing the Complainant of the investigation process.~~

Investigations shall be completed promptly. What constitutes promptness will depend on the complexity of the issues, the number of incidents or factual elements, the number of witnesses and documents to be consulted, and the availability of witnesses and other evidence. The CO shall keep the Complainant reasonably informed of the investigation's progress.

The investigation will include:

- A. interview(s) with the Complainant;
- B. interview(s) with ~~the Respondent~~ ~~any persons named in the complaint~~;
- C. interviews with any other witnesses who ~~reasonably~~ may ~~reasonably~~ be expected to have any information relevant to the allegations, as determined by the CO;
- D. consideration of any documentation or other ~~information~~ ~~evidence~~ presented by the Complainant, Respondent, or any other witness which is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO ~~or the designee~~ shall prepare and deliver a written report to the Superintendent which summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the ~~definition of discrimination/retaliation as provided in Board policy and State and Federal law as to whether the Respondent has engaged in harassment/retaliation of the Complainant~~ ~~definitions in this Policy, as well as in State and Federal law as to whether the Complainant has been denied access to educational opportunities on the basis of one of the protected classifications, based on a preponderance of evidence standard.~~ The CO's recommendations must be based upon the totality of the circumstances, ~~including the ages and maturity levels of those involved.~~ ~~In determining if discrimination or retaliation occurred, a preponderance of evidence standard will be used.~~

The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.

In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation, the CO may in consultation with the Superintendent or Board President, **if the matter involves the Superintendent**, engage outside legal counsel to conduct the investigation consistent with this policy.

Absent extenuating circumstances, within ~~five (5) ten (10) business~~ days of receiving the report of the CO ~~or designee~~, the Superintendent must either issue a final decision regarding ~~whether the charges have been substantiated~~ ~~the complaint~~ or request further investigation. A copy of the Superintendent's final decision will be delivered to the Complainant ~~(-)~~ and to the Respondent, ~~if any~~ **[END OF OPTION]**. The Superintendent may redact information from the decision in the event the release of information raises concerns regarding the integrity of the complaint or investigation process. The Board authorizes the Superintendent to consult with legal counsel to determine the extent to which information in an investigation report must be provided to either the Complainant or Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within ~~five (5) ten (10) business~~ days. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above. The decision of the Superintendent will be reviewed by the Board upon request.

If the Complainant feels that the decision does not adequately address the complaint s/he may appeal the decision to the State Superintendent of Public Instruction.

The Board reserves the right to investigate and resolve a complaint, or report of, discrimination/retaliation regardless of whether the Complainant pursues ~~member of the School District community or third party chooses to pursue~~ the complaint. The Board also ⁹⁶ reserves the right to have the complaint investigation conducted by an external person in accordance with this policy, or in such other manner as deemed appropriate by the Board or its designee.

The parties may be represented, at their own cost, at any of the above-described interviews/meetings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the OCR or ICRC, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint process is not a prerequisite to the pursuit of other remedies.

Additional School District Action

If the evidence suggests that any conduct at issue violates any other policies of the Board, is a crime, or requires mandatory reporting under the Children's Code (Sec. 48.981, Wis. Stat.), the CO or Superintendent shall take additional such actions as necessary and appropriate under the circumstances, which may include a report to the appropriate social service and/or law enforcement agency charged with responsibility for handling such investigations.

Privacy/Confidentiality

The District will employ all make reasonable efforts to protect the rights of the Complainant, the Respondent(s), and the witnesses as much as possible, consistent with the District's legal obligations to investigate, take appropriate action, and comply with any discovery or disclosure obligations ~~privacy of any individuals involved in the investigation process~~. Confidentiality cannot be guaranteed, however. All Complainants proceeding through the investigation process should be advised that as a result of the investigation, allegations against individuals may become known to those individuals, including the Complainant's identity.

All records generated under the terms of this policy shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided the Complainant's identity.

During the course of an investigation, the CO or designee will instruct each person ~~all members of the School District community and third parties~~ who is are interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of an investigation is expected not to disclose to third parties any information that is learned or provided ~~s/he learns or that s/he provides~~ during the course of the investigation.

Remedial Action and Monitoring

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to the discrimination, the opportunity to complete assignments missed due to absences related to the discrimination, or other appropriate action.

The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and the terms of any relevant code of conduct.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the age and maturity level of any student involved. In those cases where discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior disciplinary action has been taken against the Respondent, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its recurrence, and remedy its effect.

Impartial Due Process Hearing

A student and/or parent may request an impartial due process hearing regarding the identification, evaluation, or placement of a student with a disability. The student and/or parent may but are not required to first exhaust the above complaint procedure before

requesting an impartial due process hearing. The parent of a student with a disability and a student over eighteen (18) years old (if not under guardianship) or an emancipated student has the right to: (1) examine records or documents that the school relied on in making its decision about the student; (2) request an impartial due process hearing that provides the parent and/or student with an opportunity to participate and permits representation by an attorney; and (3) have an opportunity for review of the decision made at the hearing.

A request for an impartial due process hearing should be made as soon as possible following a dispute in order to ensure that witnesses are available but no more than two years following the date of the matter in dispute. A request for an impartial due process hearing must be put in writing, identify the specific circumstances or areas of dispute that have given rise to the request for a hearing, and offer possible solutions to the dispute. The request for due process hearing must be filed with a District CO within the time limits specified above. The CO is available to assist individuals in filing a request for an impartial due process hearing.

When a request for an impartial due process hearing is received, the aggrieved party will have the opportunity to receive a hearing conducted by an IHO (i.e., by a person not employed by the District, not involved in the education or care of the child, and not having a personal or professional interest that would conflict with the IHO's objectivity in the hearing). The District will maintain a list of trained IHOs that may include IDEA/Article 7 hearing officers, attorneys, and Directors of Special Education outside the District. The District CO will appoint an IHO from that list, and the District will bear the costs of the hearing. The appointment of an IHO will be made within fifteen (15) days after the request for an impartial due process hearing is received.

A party to an impartial due process hearing has the right to:

- A. be accompanied and advised by legal counsel and individuals with special knowledge or training with respect to the problems of students with disabilities at the party's own cost;
- B. present evidence and confront, cross-examine and compel the attendance of witnesses;
- C. a written or electronic verbatim record of the hearing; and
- D. written findings of fact and conclusions of law setting forth the reasons for the decision.

The IHO shall conduct the impartial due process hearing within a reasonable period of time (i.e., not to exceed ninety (90) days from the request for a hearing, unless this time-frame is mutually waived by the parties or is determined by the IHO to be impossible to comply with due to extenuating circumstances). The IHO will give the parent and/or student written notice of the date, time and place of the hearing. Notice will be given no less than twenty-one (21) days prior to the date of the hearing, unless otherwise agreed to by the parent and/or student. The notice shall include:

- A. a statement of the time, place and nature of the hearing;
- B. a statement of the legal authority and jurisdiction under which the hearing is being held;
- C. a reference to the particular section(s) of the statutes and rules involved;
- D. a statement of the availability of relevant records for examination;
- E. a short and plain statement of the matters asserted; and
- F. a statement of the right to be represented by counsel.

The IHO shall conduct the hearing in a manner that will afford all parties a full and fair opportunity to present evidence and otherwise to be heard. The parent and/or student may be represented by another person of the parent or student's choice, including an attorney. The IHO shall make a full and complete record of the proceedings.

The IHO shall render a decision in writing to the parties within thirty (30) days following the conclusion of the hearing. The decision will be based solely on the testimony and demonstrative evidence presented at the hearing and include a summary of the evidence (i.e., findings of fact) and the reason for the decision (conclusions of law). The IHO's decision shall include a statement that either party may appeal the decision.

Appeal of the IHO's decision may be made to a Federal court of competent jurisdiction.

OCR Complaint

At any time, if a student or parent believes that the student has been subjected to discrimination based upon disability in violation of Section 504 or the ADA, the student or parent may file a complaint with the OCR. The OCR can be reached at:

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U.S. Department of Education
Office for Civil Rights
Chicago Office
John C. Kluczynski Federal Building
230 S. Dearborn Street, 37th Floor
Chicago, IL 60604
Telephone: 312-730-1560
FAX: 312-730-1576
TDD: 800-877-8339
E-mail: OCR.Chicago@ed.gov
Web: <http://www.ed.gov/ocr>

Except in extraordinary circumstances, the OCR does not review the result of individual placement and other educational decisions, so long as the District complies with the "process" requirements of Subpart D of Section 504.

Notice

Notice of the Board's policy on nondiscrimination in education practices and the identity of the COs will be published on the District's website and posted throughout the District, and included published in the District's recruitment statements or general information publications.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging discrimination/retaliation or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made by any Federal or State civil rights law, made a report/formal complaint, testified, assisted or participated, or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of discriminatory practices. The Superintendent shall provide appropriate information to all members of the District community related to the implementation of this policy and shall provide training for District students and staff where appropriate. All training and information provided regarding the Board's policy and discrimination in general will be age and content appropriate.

Retention of ~~Public Records, Student Records, and~~ Investigatory Records and Materials

The CO is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all information, documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and received as part of an investigation, including but not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;
- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;

- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
 - F. all documentary evidence;
 - G. e-mails, texts, or social media posts related to the investigation;
 - H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
 - I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;
 - J. dated written determinations to the parties;
 - K. dated written descriptions of verbal notifications to the parties;
 - L. written documentation of any supportive interim measures offered and/or provided to the Complainant and/or the Respondent/Complainants, including no contact orders issued to both parties, the dates issued, and the dates the parties acknowledged receipt; and
 - M. documentation of all actions, both individual and systemic, taken to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects.
 - N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Codes of Conduct and/or Employee Handbooks);
 - O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
 - P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy. ~~REMINDER: Documentation of training should be maintained regardless of whether there is an investigation of an alleged violation of this policy. It is best practice to maintain a log of all staff members who participate in a training, along with the date, time and location of the training, and a copy of the materials reviewed and/or presented during the training.~~
- ~~[DRAFTING NOTE: The following options should be selected if the District concludes that the following items are not adequately encompassed in the preceding paragraphs.]~~
- Q. ~~documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms;)(~~
 - R. ~~copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy;)(~~
 - S. ~~) copies of any notices sent to the Complainant and the Respondent in advance of any interview, meeting, or hearing;)(~~
 - T. ~~copies of any notices sent to the Complainant and alleged perpetrator in advance of any interview or hearing;)(~~
 - U. ~~copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.)(~~

Additionally, the CO shall retain copies of any written request for an impartial due process hearing, the IHO's notices to the parties, the evidence entered in the hearing, any transcript of the hearing, and the IHO's decision.

The information, documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The information, documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

~~F.C. 6/22/20~~
~~F.C. 8/24/20~~

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Legal 29 C.F.R. Part 1630
 34 C.F.R. Part 104
 42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	NONDISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY
Code	po3122
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	6/22/2020, 04/24/2019

3122 - NONDISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY

The Board does not discriminate in the employment of professional staff on the basis of ~~the Protected Classes of~~ race, color, national origin, age, sex (including ~~trans~~gender status, change of sex, sexual orientation, or gender identity), pregnancy, creed or religion, genetic information, handicap or disability, marital status, citizenship status, veteran status, military service (as defined in 111.32, Wis. Stats.), ancestry, arrest record, conviction record, use or non-use of lawful products off the District’s premises during non-working hours, declining to attend an employer-sponsored meeting or to participate in any communication with the employer about religious matters or political matters, or any other legally protected category in its programs and activities, including employment opportunities characteristic protected by law in its employment practices.

Notice of the Board's policy on nondiscrimination and the identity of the School District's Compliance Officer(s) (see below) will be published on the District's website, posted throughout the District, and included in the District's recruitment statements or general information publications.

Definitions

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

Complainant is the individual who alleges, or is alleged, to have been subjected to discrimination/retaliation, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged discrimination/retaliation.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Military status: refers to a person's status in the uniformed services, which includes the performance of duty on a voluntary or involuntary basis in a uniformed service, including active duty, active duty for training, initial active duty for training, inactive duty for training, full-time National Guard duty, and performance of duty or training by a member of Wisconsin organized militia. It also includes the period of time for which a person is absent from employment for the purpose of an examination to determine the fitness of the person to perform any duty listed above.

Respondent is the individual who has been alleged to have engaged in discrimination/retaliation, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged discrimination/retaliation.

School District community means students and Board employees (i.e., administrators, and professional and support staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals

who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

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District Compliance Officers

The Board designates the following individuals to serve as the District's "Compliance Officers" (also known as "Civil Rights Coordinators"); hereinafter referred to as the "COs").

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets, Assistant Superintendent
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public.

The COs are responsible for coordinating the District's efforts to comply with the applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding discrimination, retaliation, or denial of equal access. The COs shall also verify that proper notice of nondiscrimination has been provided for Title II of the Americans with Disabilities Act (as amended), Title VI and Title VII of the Civil Rights Act of 1964, ~~Title IX of the Education Amendment Act of 1972~~, Section 504 of the Rehabilitation Act of 1973 (as amended), the Age Discrimination in Employment Act of 1975, and the Genetic Information Nondiscrimination Act (GINA) to students, their parents, staff members, and the general public. (X) Any sections of the District's postings, notifications, advertisements, or other materials regarding recruiting, hiring, and promotion need to contain a statement of nondiscrimination similar to that in the Board's statement above. In addition, any gender-specific terms should be eliminated from these materials. A copy of each of the Acts and regulations on which this notice is available upon request from the CO.

Reports and Complaints of ~~Unlawful~~ Discrimination and Retaliation

Employees are ~~required to~~expected to promptly report incidents of ~~unlawful~~ discrimination and/or retaliation to an administrator, supervisor, or other supervisory employees so that the Board may address the conduct. Any administrator, supervisor, or other supervisory employees who receive such a ~~report~~complaint shall file it with the CO at ~~the employee's~~his/her first opportunity, but no later than two (2) ~~business~~ days.

Discrimination against an individual based on their sex (including gender status, sexual orientation, and gender identity) is discrimination in violation of Title VII. Specifically, discrimination on the basis of sex stereotyping/gender-nonconformity constitutes sex discrimination. This is true irrespective of the cause of the person's gender non-conforming behavior. Employment actions based upon an individual's sex could be suspect and potentially impermissible.

COs are required to investigate allegations of conduct involving the discrimination or harassment of an employee or applicant based upon his/her gender status, sexual orientation, and gender identity.

Any questions concerning whether alleged conduct might violate this prohibition should be brought to the CO's attention promptly.

Employees who believe they have been ~~unlawfully~~ discriminated/retaliated against are entitled to utilize the complaint process set forth below. Initiating a complaint will not adversely affect the ~~Complainant's~~complaining individual's employment. While there are no time limits for initiating complaints under this policy, individuals should make every effort to file a complaint as soon as possible after the conduct occurs while the facts are known and potential witnesses are available.

The COs will be available during regular school/work hours to discuss concerns related to ~~unlawful~~ discrimination/retaliation. COs shall accept ~~reports~~complaints of ~~unlawful~~ discrimination/retaliation directly from any member of the School District community or a Third Party, or receive reports that are initially filed with another Board employee (District employees, students, parent(s), and member of the Board), a resident of the District, or a visitor to the District. Upon receipt of a report of alleged discrimination/retaliation~~complaint, the either directly or through a school building administrator, a CO will contact the Complainant and begin either an informal or formal complaint process (depending on the Complainant's request and the nature of the alleged discrimination/retaliation) investigation, or [] Option 1 [t~~he CO will designate a specific individual to conduct such a process as

~~identified in a pre-defined list of investigators. the CO will designate a specific individual to conduct such a process.~~ The CO will provide a copy of this policy to ~~the Complainant and the Respondent upon request. any person who files a complaint. All members of the School District community must report incidents of discrimination/retaliation that are reported to them to the CO within two (2) business days of learning of the incident/conduct.~~ ¹⁰³

Any Board employee who directly observes ~~unlawful~~ discrimination/retaliation is obligated, in accordance with this policy, to report such observations to one of the COs within two (2) business days. Additionally, any Board employee who observes an act of ~~unlawful~~ discrimination/retaliation is expected to intervene to stop the misconduct, unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other Board employees and/or local law enforcement officials, as necessary, to stop the misconduct. Thereafter, the CO must contact the ~~Complainant~~ ^{employee} within two (2) business days to advise ~~him/her~~ of the Board's intent to investigate the alleged wrongdoing.

Investigation and Complaint Procedure

~~Except for sex discrimination and/or sexual harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities, any employee who alleges to have been~~ ^{Any employee who believes that s/he has been} subjected to ~~unlawful~~ discrimination or retaliation may seek resolution of ~~the his/her~~ complaint through the procedures described below. The complaint procedures involve an investigation of the individual's claims ~~of discrimination/retaliation~~ and a process for rendering a decision regarding whether the charges are substantiated.

Once the complaint process begins, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) ~~business~~ days of the complaint being received).

The procedures set forth below are not intended to interfere with the rights of any individual to pursue a complaint of ~~unlawful~~ discrimination or retaliation with the United States Department of Education Office for Civil Rights, the Wisconsin Equal Rights Division, or the Equal Employment Opportunity Commission ("EEOC").

Complaint Procedure

~~A Complainant who alleges discrimination/retaliation. An individual who believes s/he has been subjected to unlawful discrimination/retaliation (hereinafter referred to as the "Complainant"),~~ may file a complaint, either orally or in writing, ~~;~~ ¹⁾ with a Principal; ²⁾ the CO; ^{or 3)} to the Superintendent or other supervisory employees. Any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall assume the role of the CO for such complaints. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who shall ~~coordinate with the other appointed/designated~~ ^{assume the role of} CO ~~or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO. for such complaints.~~

Due to the sensitivity surrounding complaints of ~~unlawful~~ discrimination and retaliation, timelines are flexible for initiating the complaint process; however, individuals ~~are encouraged~~ ^{should make every effort} to file a complaint within thirty (30) ~~calendar~~ days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a Principal, Superintendent, or other supervisory employees, either orally or in writing, about any complaint of discrimination or retaliation, that employee must report such information to the CO ~~at the employee's first opportunity, but no later than~~ ^{within} two (2) ~~business~~ days.

Throughout the course of the process, the CO should keep the parties ~~reasonably~~ informed of the status of the investigation and the decision-making process.

All complaints must include the following information to the extent ~~known it is available~~: the identity of the ~~Respondent individual believed to have engaged in, or be engaging in, the discriminatory/retaliatory conduct~~; a detailed description of the facts upon which the complaint is based ~~(i.e., when, where, and what occurred)~~; a list of potential witnesses; and the resolution sought by the Complainant.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the CO shall ask for such details in an oral interview. Thereafter, the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken in the investigatory phase to protect the Complainant from further discrimination or retaliation, including, ~~but not limited to,~~ a change of work assignment or schedule for the Complainant and/or the ~~Respondent person who allegedly engaged in the misconduct~~. In making such a determination, the CO should consult the Complainant to assess ~~whether the individual agrees with his/her position to~~ the proposed action. If the Complainant is unwilling to consent to the proposed change, the CO may still ~~may~~ take whatever actions ~~are deemed~~ ^{s/he deems} appropriate in consultation with the Superintendent.

~~Within two (2) days of receiving the complaint, the CO or designee will initiate an investigation by at a minimum confirming receipt of the complaint with the Complainant and informing the Complainant of the investigation process. Within two (2) business days of~~

~~receiving the complaint, the CO will initiate an investigation to determine whether the Complainant has been subjected to unlawful discrimination/retaliation.~~

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Simultaneously, the CO will inform the ~~Respondent that a formal individual alleged to have engaged in the discriminatory or retaliatory conduct (hereinafter referred to as the "Respondent"), that a~~ complaint has been received. The Respondent will be informed about the nature of the allegations and ~~upon request~~ provided with a copy of any relevant policies and/or administrative guidelines, including this Policy. The Respondent must also be informed of the opportunity to submit a written response to the complaint ~~and the obligation to do so~~ within five (5) ~~business~~ days.

~~Investigations shall be completed promptly. What constitutes promptness will depend on the complexity of the issues, the number of incidents or factual elements, the number of witnesses and documents to be consulted, and the availability of witnesses and other evidence. The CO shall keep the Complainant reasonably informed of the investigation's progress. [END-OF-OPTIONS] Although certain cases may require additional time, the CO will attempt to complete an investigation into the allegations of discrimination/retaliation within fifteen (15) business days of receiving the formal complaint. The investigation will include:~~

The investigation will include:

- A. interviews with the Complainant;
- B. interviews with the Respondent;
- C. interviews with any other witnesses who may reasonably be expected to have any information relevant to the allegations, as determined by the CO;
- D. consideration of any documentation or other information presented by the Complainant, Respondent, or any other witness that is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO shall prepare and deliver a written report to the Superintendent that summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definition of ~~unlawful~~ discrimination/retaliation as provided in Board policy and State and Federal law as to whether the ~~Respondent has engaged in harassment/retaliation of the Complainant~~ ~~Complainant has been subjected to unlawful discrimination/retaliation~~. The CO's recommendations must be based upon the totality of the circumstances. In determining if discrimination or retaliation occurred, a preponderance of evidence standard will be used.

The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.

In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation, the CO may in consultation with the Superintendent or Board President, if the matter involves the Superintendent, engage outside legal counsel to conduct the investigation consistent with this policy.

Absent extenuating circumstances, within five (5) ~~business~~ days of receiving the report of the CO, the Superintendent ~~either~~ must ~~either~~ issue a ~~written final~~ decision regarding whether the charges have been substantiated or request further investigation. A ~~summary explanation of the copy of~~ the Superintendent's final decision will be ~~provided delivered~~ to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within five (5) ~~business~~ days, or as quickly as possible if additional time is necessary due to the availability of necessary witness(es) or documents. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above.

If the Superintendent determines the ~~Respondent engaged in discrimination/retaliation toward the Complainant, the Complainant was subjected to unlawful discrimination/retaliation, s/he~~ must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the discrimination/retaliation. The corrective action should be reasonable, timely, age-appropriate, effective, and tailored to the specific situation.

A Complainant or Respondent who is dissatisfied with the final decision of the Superintendent may appeal through a signed written statement to the Board within five (5) ~~business~~ days of the party's/his/her receipt of the Superintendent's ~~final~~ decision. The written statement of appeal must be submitted to the Superintendent, who will forward the request to the Board President.

In an attempt to resolve the complaint, the Board shall review the findings and may meet with the concerned parties and their

representatives within twenty (20) ~~business~~ days of the receipt of such an appeal. A copy of the Board's disposition of the appeal shall be sent to each concerned party within ten (10) ~~business~~ days of its decision. The decision of the Board will be final.

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The Board reserves the right to investigate and resolve a complaint or report of ~~unlawful~~ discrimination/retaliation regardless of whether the ~~Complainant employee alleging the misconduct~~ pursues the complaint. The Board also reserves the right to have the complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board or its designee.

The parties may be represented, at their own cost, at any of the above-described interviews/meetings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint ~~process~~ procedure is not a prerequisite to the pursuit of other remedies.

Privacy/Confidentiality

The Board will employ all reasonable efforts to protect the rights of the Complainant, the Respondent(s), and the witnesses as much as possible, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery or disclosure obligations.

All records generated under the terms of this policy shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Respondents must be provided an opportunity to meaningfully respond to allegations, which may include disclosure of the Complainant's identity. ~~Additionally, the Respondent must be provided the Complainant's identity. All Complainants will be advised that their identities may become known to the Respondent(s) through the investigation process.~~

During the course of an investigation, the CO will instruct each person who is interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of an investigation is expected not to disclose to third parties any information that is learned or provided ~~s/he learns and/or provides~~ during the course of the investigation.

Remedial Action ~~Sanctions~~ and Monitoring

~~The Board shall vigorously enforce its prohibitions against unlawful discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct. While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee. All disciplinary action will be taken in accordance with applicable State law. When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter. In those cases where unlawful discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies and/or the Employee Handbook.~~

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to the discrimination, or other appropriate action.

The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and any relevant codes of conduct.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the age and maturity level of any student involved. In those cases where discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior ~~disciplinary~~ remedial action has been taken against ~~the Respondent~~ an employee, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its recurrence, and remedy its effect.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging ~~unlawful~~ discrimination/retaliation, or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made by any Federal or State civil rights law, or because that individual made a report, formal complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy. ~~Specifically, the Board will not retaliate against, coerce, intimidate, threaten or interfere with any individual because the person opposed any act or practice made unlawful by any Federal or State civil rights law, or because that individual made a charge, testified, assisted or participated in any manner in an investigation, proceeding, or hearing under those laws, or because that individual exercised their rights, aided or encouraged any other person in the exercise of any right granted or protected by those laws.~~ 106

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of ~~unlawful~~ discriminatory practices. The Superintendent shall provide appropriate information to all members of the School District community related to the implementation of this policy and shall provide training for District staff where appropriate. All training, as well as all information provided regarding the Board's policy and discrimination in general, will be age and content appropriate.

Retention of Investigatory Records and Materials

The CO is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all ~~information,~~ documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include ~~including,~~ but are not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;
- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;
- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
- F. all documentary evidence;
- G. e-mails, texts, or social media posts pertaining to the investigation;
- H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
- I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;
- J. dated written determinations to the parties;
- K. dated written descriptions of verbal notifications to the parties;
- L. written documentation of any ~~supportive interim~~ measures offered and/or provided to the Complainant and/or the Respondent ~~complainants~~, including no contact orders issued to both parties, the dates issued, and the dates the parties acknowledged receipt; and

- M. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects; ~~;~~
- N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Codes of Conduct and/or Employee Handbooks);
- O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy. ~~;~~
- Q. ~~) documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms; (~~
- R. ~~copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy;) (~~
- S. ~~) copies of any notices sent to the Complainant and the Respondent in advance of any interview, meeting, or hearing; (~~
- T. ~~copies of any notices sent to the Complainant and alleged perpetrator in advance of any interview or hearing;) (~~
- U. ~~copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.) (~~

The ~~information,~~ documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The ~~information,~~ documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

~~Revised 10/4/18~~
~~Revised 4/24/19~~
~~T.C. 6/22/20~~

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Legal	111.31 et seq., Wis. Stats.	108
	111.335(d)(2), Wis. Stats.	
	118.195, Wis. Stats.	
	118.20, Wis. Stats.	
	Fourteenth Amendment, U.S. Constitution	
	20 U.S.C. Section 1701 et seq., Equal Educational Opportunities Act of 1974	
	20 U.S.C. Section 7905, Boy Scouts of America Equal Access Act	
	29 U.S.C. 701 et seq., Rehabilitation Act of 1973, as amended	
	38 U.S.C. 4301 et seq., Uniformed Services Employment and Reemployment Rights Act	
	42 U.S.C. 2000 et seq., Civil Rights Act of 1964	
	42 U.S.C. 2000d et seq., Title VI of the Civil Rights Act of 1964	
	42 U.S.C. 2000e et seq., Title VII of the Civil Rights Act of 1964	
	42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act of 1973 as amended	
	42 U.S.C. 6101 et seq., Age Discrimination Act of 1975	
	42 U.S.C. 12101 et seq., The Americans with Disabilities Act of 1990, as amended	
	29 C.F.R. Part 1635, The GINA Regulations	
	34 C.F.R. Part 110, The Age Discrimination Act Regulations	

Cross References [3122F - Discrimination/Harassment Complaint Form](#)

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	NONDISCRIMINATION BASED ON GENETIC INFORMATION OF THE EMPLOYEE
Code	po3122.02
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021

3122.02 - NONDISCRIMINATION BASED ON GENETIC INFORMATION OF THE EMPLOYEE

The Board of Education prohibits discrimination on the basis of genetic information in all aspects of employment, including hiring, firing, compensation, job assignments, promotions, layoffs, training, fringe benefits, or any other terms, conditions, or privileges of employment. The Board also does not limit, segregate, or classify applicants or employees in any way that would deprive or tend to deprive them of employment opportunities or otherwise adversely affect the status of the person as an employee as an employee, based on genetic information. Harassment of a person because of his/her genetic information is also is prohibited. Likewise, retaliation against a person for identifying, objecting to, or filing a complaint concerning a violation of this policy an applicant or employee for engaging in protected activity is prohibited.

The identity of the Compliance Officer (see Policy 3122 - Nondiscrimination and Equal Employment Opportunity) shall be posted throughout the District and published in any District statement regarding the prohibition of discrimination on the basis of genetic information in all aspects of employment, in any staff handbooks, and in general information publications of the District as required by Federal and State law and on the District website.

In accordance with Title II of the Genetic Information Nondiscrimination Act of 2008, 42 U.S.C. 2000ff, et seq., and 29 C.F.R. Part 1635 ("GINA"), the Board shall not request, require or purchase genetic information of employees, their family members or applicants for employment. Further, in compliance with GINA this Act, applicants and employees are directed not to provide any genetic information, including the individual's family medical history, in response to necessary requests for medical information, with the exception that family medical history may be provided acquired as part of the certification process for FMLA leave, or when an employee is asking for leave to care for an immediate family member with a serious health condition. Applicants for employment are directed not to provide any genetic information, including the individual's family medical history, in response to requests for medical information as part of the District's application for employment process. Employees and applicants for employment shall not be penalized for providing genetic information in good faith in response to a request from a District employee or agent, unless that applicant or employee refuses to delete the information at the request of the employee or agent of the District.

The Board District recognizes that genetic information may be acquired through commercially and publicly available media including documents like newspapers, books, magazines, periodicals, television shows or the Internet. The Board District prohibits, however, District its employees and agents including commercial background investigation agents from searching these such sources with the intent of finding or obtaining genetic information, or accessing sources from which they are likely to acquire genetic information. If genetic information about an employee or applicant is obtained in error, it shall be redacted immediately and not shared beyond the point of first receipt.

As used in this policy, "Genetic information," as defined by GINA, means information about: (a) an individual's genetic tests; (b) the genetic tests of that individual's family members; (c) the manifestation of disease or disorder in family members of the individual (i.e., family medical history); (d) an individual's request for, or receipt of, genetic services; or the participation in clinical research that includes genetic services by the individual or a family member of the individual; or (e) the genetic information of a fetus carried by an individual or a pregnant woman who is a family member of the individual and the genetic information of an embryo legally held by an individual or family member using assistive reproductive technology.

The term "genetic information" does not include information about the sex or age of the individual, the sex or age of family members, or information about the race or ethnicity of the individual or family member that is not derived from a genetic test.

As used in this policy, "genetic test" means an analysis of human DNA, RNA, chromosomes, proteins, or metabolites that detect genotypes, mutations, or chromosomal changes. The term includes any test of a person's DNA/RNA.

If the District's employees or agents District either legally and/or inadvertently receives genetic information about an employee or applicant for employment from the employee, applicant for employment, or a medical provider it shall be treated as a confidential medical record in accordance with law.

The District's Superintendent shall appoint a Compliance Officer (see Policy 3122 - Nondiscrimination and Equal Employment Opportunity) who shall be responsible for overseeing the Board District's compliance with this policy and GINA and proposing revisions and additions to this policy as necessary to ensure the Board's compliance with GINA Federal regulations and promptly dealing with any inquiries or complaints. This person shall be responsible for working with the Board's legal counsel to fully implement the requirements of GINA in all activities of the School District. The Compliance Officer S/He shall also shall verify that proper notice of nondiscrimination for Title II of GINA the Genetic Information Nondiscrimination Act of 2008 is provided to staff members, and that all District requests for health-related information (e.g., to support an employee's request for reasonable accommodation under the ADA or a request for sick leave) are accompanied by a written warning that directs the employee or health care provider not to collect or provide genetic information. The warning shall read as follows:

Genetic Information Nondiscrimination Act of 2008 (GINA) Disclosure Requirement

The Genetic Information Nondiscrimination Act of 2008 or ("GINA") prohibits employers and other entities covered by the law GINA Title II, including the Board of Education, from requesting or requiring genetic information of an employee or applicant individual or family member of an employee or applicant the individual, except as specifically allowed by law. To comply with GINA this law, do not provide any genetic information when responding to this request for medical information (unless the request pertains to a request for FMLA leave for purposes of caring for an immediate family member with a serious health condition). "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic test, the fact that an individual or an individual's family member sought or received genetic services or participated in clinical research that includes genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services. Questions concerning compliance with the requirements of GINA may be directed to the Compliance Officer at 715-359-4221.

The Board District offers health services. Participation in the services/program is voluntary. Genetic information (such as family medical history) may be obtained as part of an individual's participation in the service/program. If that occurs, individual genetic information may be provided to the individual receiving the services and to his/her health services providers, but only genetic information in aggregate form will be provided to the District Board and no applicant or employee shall be identified or identifiable from the reported information.

The grievance procedure for complaints of discrimination in Policy 3122 applies to complaints of discrimination, including harassment, or retaliation prohibited by GINA and may be utilized if an employee alleges discrimination or harassment on the basis of genetic information or retaliation for identifying, objecting to, or filing a complaint concerning a violation of GINA or this policy.

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Legal 42 U.S.C. 2000ff et seq.
Title II, The Genetic Information Nondiscrimination Act of 2008
29 C.F.R. Part 1635

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	SECTION 504/ADA PROHIBITION AGAINST DISABILITY DISCRIMINATION IN EMPLOYMENT
Code	po3123
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	6/22/2020

3123 - SECTION 504/ADA PROHIBITION AGAINST DISABILITY DISCRIMINATION IN EMPLOYMENT

The Board prohibits discrimination against any employee or applicant based upon his/her disability. As such, the Board will not engage in employment practices or adopt policies that discriminate on the basis of disability, or otherwise discriminate against qualified individuals with disabilities in regard to job application procedures, the hiring, advancement or discharge of employees, employee compensation, job training, or other terms, conditions and privileges of employment. The Board further will not limit, segregate or classify applicants or employees in any way that adversely affects their opportunities or status because of disability. Additionally, the Board will not participate in any contractual or other relationships that have the effect of subjecting qualified individuals with disabilities who are applicants or employees to discrimination on the basis of disability.

Notice of the Board's policy on nondiscrimination in employment practices and the identity of the School District's Compliance Officer(s) (see below) will be published on the District's website, posted throughout the District, and included in the District's recruitment statements or general information publications.

Definitions

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

Complainant: is the individual who alleges or is alleged to have been subjected to discrimination/retaliation, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged discrimination/retaliation.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Respondent: is the individual who is alleged to have engaged in discrimination/retaliation, regardless of whether the Complainant files a formal complaint or is seeking an informal resolution to the alleged discrimination/retaliation.

District community: means students, District employees (i.e., administrators, and professional and support staff), and Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties: include but are not limited to guests and/or visitors on District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with or seeking to do business with the Board, and other individuals who come in contact with members of the District community at school-related events/activities (whether on or off District property).

An individual with a disability means a person who has, **has had** a record of, or is regarded as having, a physical or mental impairment that substantially limits one or more major life activities.

Major Life Activities

Major life activities are functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, eating, sleeping, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, sitting, reaching, interacting with others, and working. 112

Major life activities also include the operation of a major bodily function, including, but not limited to, functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, hemic, lymphatic, musculoskeletal and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

Impairment That Substantially Limits a Major Life Activity

~~An impairment that is episodic in nature or in remission is considered a disability if it would substantially limit a major life activity when active.~~

The determination of whether an impairment substantially limits a major life activity must be made without regard to the ameliorative effects of mitigating measures such as medication, medical supplies, equipment or appliances, low-vision devices (defined as devices that magnify, enhance, or otherwise augment a visual image, but not including ordinary eyeglasses or contact lenses), prosthetics (including limbs and devices), hearing aid(s) and cochlear implant(s) or other implantable hearing devices, mobility devices, oxygen therapy equipment or supplies, use of assistive technology, reasonable accommodations or "auxiliary aids or services," learned behavioral or adaptive neurological modifications, psychotherapy, behavioral therapy, or physical therapy.

An impairment that is episodic in nature or in remission is considered a disability if it would substantially limit a major life activity when active.

Qualified Individual with a Disability

A qualified individual person with a disability means the individual satisfies the requisite skill, experience, education and other job-related requirements of the employment position the such individual holds or desires and ~~with or without reasonable accommodation,~~ can perform the essential functions of the job in question, with or without reasonable accommodation.

Reasonable Accommodation

The Board will provide a reasonable accommodation to a qualified individual who has an actual disability or who has a record of a disability unless the accommodation would impose an undue hardship on the operation of the Board District's program and/or activities. A reasonable accommodation is not ~~necessarily~~ required for an individual who is merely regarded as having a disability.

Facilities

No qualified person with a disability will be denied the benefits of, excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which Section 504/American with Disabilities Act (ADA) applies because the District's facilities are inaccessible to or unusable by persons with disabilities.

For facilities constructed or altered after June 3, 1977, the District will comply with applicable accessibility standards. For those existing facilities constructed prior to June 3, 1977, the District is committed to operating its programs and activities so that they are readily accessible to persons with disabilities.

District Compliance Officer(s)

The Board designates the following individual(s) to serve as the District's 504 CO(s)/ADA Coordinator(s) (hereinafter referred to as the "COs").

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets, Assistant Superintendent
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The name(s), title(s), and contact information of this/these individual(s) will be published annually on the School District's website.

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The COs are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding discrimination/retaliation or denial of equal access. The COs also shall verify that proper notice of nondiscrimination for Title II of the Americans with Disabilities Act (as amended), Title VI and Title VII of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 (as amended), and the Age Discrimination in Employment Act of 1975 is provided to staff members and the general public. A copy of each of the Acts and regulations on which this notice is based will be made available upon request from the CO. ~~Any sections of the and fulfill its responsibilities under Section 504 and Title II of the Americans with Disabilities Act, as amended ("ADA"). A copy of Section 504 and the ADA, including copies of their implementing regulations, may be obtained from the District COs.~~

The COs will oversee the investigation of any complaints of discrimination based on disability, which may be filed pursuant to the Board's adopted internal complaint procedure, and will attempt to resolve such complaints. Any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall assume the role of the CO for such complaints, as appropriate. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who shall coordinate with the other appointed/designated CO, or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO.

The Board will provide for the prompt and equitable resolution of complaints alleging violations of Section 504/ADA. (See Complaint Procedure below.)

Training

~~The COs will also oversee the training of employees in the District so that all employees understand their rights and responsibilities under Section 504 and the ADA, and are informed of the Board's policies, administrative guidelines, and practices with respect to fully implementing and complying with the requirements of Section 504/ADA.~~

~~The Board will provide in-service training and consultation to staff responsible for the education of persons with disabilities, as necessary and appropriate.~~

Facilities

~~No qualified person with a disability will, because the District's facilities are inaccessible to or unusable by persons with disabilities, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which Section 504/ADA applies.~~

~~For facilities constructed or altered after June 3, 1977, the District will comply with applicable accessibility standards. For those existing facilities constructed prior to June 3, 1977, the District is committed to operating its programs and activities so that they are readily accessible to persons with disabilities.~~

Notice

~~Notice of the Board's policy on nondiscrimination in employment practices and the identity of the COs will be posted throughout the District, and published in the District's recruitment statements or general information publications.~~

Complaint Procedures

If a person believes that s/he has been discriminated against on the basis of his/her disability, the person may utilize the following complaint procedures as a means of reaching, at the lowest possible administrative level, a prompt and equitable resolution of the matter.

In accordance with Section 504 of the Rehabilitation Act of 1973 and its implementing regulations ("Section 504"), employees will be notified of their right to file an internal complaint regarding an alleged violation, misinterpretation, or misapplication of Section 504. In addition, employees will be notified of their right to file a complaint with the U.S. Department of Education's Office for Civil Rights.

Internal complaints must be put in writing and must identify the specific circumstances or areas of dispute that have given rise to the complaint, and offer possible solutions to the dispute. The complaint must be filed with COs within the time limits specified below. The COs are available to assist individuals in filing a complaint.

Internal Complaint Procedure

The following internal complaint procedure is available to employees for the prompt and equitable resolution of complaints alleging discrimination based upon disability. Use of the internal complaint procedure is not a prerequisite to the pursuit of other remedies,

including the filing of a complaint with the U.S. Department of Education's Office for Civil Rights.

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- A. An employee with a complaint based on alleged discrimination on the basis of disability may first discuss the problem with the CO.
- B. If the informal discussion does not resolve the matter, or if the employee skips Step A, the individual may file a formal written complaint with the CO. The written complaint must contain the name and address of the individual or representative filing the complaint, be signed by the Complainant or someone authorized to sign for the Complainant, describe the alleged discriminatory action in sufficient detail to inform the CO of the nature and date of the alleged violation and propose a resolution. The complaint must be filed within thirty (30) ~~calendar~~ days of the circumstances or event giving rise to the complaint unless the time for filing is extended by the CO for good cause.
- C. The CO will conduct an independent investigation of the matter (which may or may not include a hearing). This complaint procedure contemplates informal, but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to present witnesses and other evidence relevant to the complaint. The CO will provide the Complainant with a written disposition of the complaint within ten (10) ~~business~~ days. If no decision is rendered within ten (10) business days, or the decision is unsatisfactory in the opinion of the Complainant, the employee may file, in writing, an appeal with the Superintendent. The CO shall maintain the District's files and records relating to the complaint.
- D. The Superintendent will, within ten (10) ~~business~~ days of receiving the written appeal, conduct a hearing with all parties involved in an attempt to resolve the complaint.

The Superintendent will render his/her decision within ten (10) ~~business~~ days of the hearing.
- E. The employee may be represented, at his/her own cost, at any of the above-described meetings/hearings.
- F. The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights or the filing of a court case. Use of this internal complaint procedure is not a prerequisite to the pursuit of other remedies.

If it is determined that the Complainant was subjected to ~~unlawful~~ discrimination, the CO must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the discrimination/retaliation. The corrective action should be reasonable, timely, effective, and tailored to the specific situation.

OCR Complaint

At any time, if an employee believes that s/he has been subjected to discrimination based upon his/her disability in violation of Section 504 or the ADA, the individual may file a complaint with the U.S. Department of Education's Office for Civil Rights ("OCR"). The OCR can be reached at:

U.S. Department of Education Office for Civil Rights Citigroup Center
500 W. Madison Street Suite 1475
Chicago, IL 60661
(312) 730-1560
FAX: (312) 730-1576
TDD: (877) 521-2172
E-mail: OCR.Chicago@ed.gov

Privacy/Confidentiality

The District will employ all reasonable efforts to protect the rights of the Complainant, the Respondent(s), and the witnesses as much as possible, consistent with the District's legal obligations to investigate, take appropriate action, and conform with any discovery or disclosure obligations.

All records generated under the terms of this policy shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided the Complainant's identity.

During the course of a formal investigation, the CO or designee will instruct each person who is interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of an investigation is expected not to disclose to third parties any information that is learned or provided during the course of the investigation.

Remedial Action and Monitoring

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to the discrimination or other appropriate action.

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The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and any relevant codes of conduct.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the age and maturity level of any student involved. In those cases where discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior disciplinary action has been taken against the Respondent, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its recurrence, and remedy its effect.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging ~~unlawful~~ discrimination/retaliation, or participates as a witness in an investigation, is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce, ~~Specifically, the Board will not discriminate/retaliate against, coerce, intimidate, threaten~~ or interfere with any individual because the person opposed any act or practice made ~~unlawful~~ by Section 504 or the ADA, or because that individual made a report, formal complaint charge, testified, assisted or participated, or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of discriminatory practices. The Superintendent shall provide appropriate information to all members of the District community related to the implementation of this policy and shall provide training for District students and staff where appropriate. All training and information provided regarding the Board's policy and discrimination, in general, will be age and content-appropriate.

Retention of Investigatory Records and Materials

The CO is responsible for overseeing the retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include but are not limited to:

- A. all written reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy;
- B. any narratives that memorialize oral reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy;
- C. any documentation that memorializes the actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities related to the investigation and/or the District's response to the alleged violation of this

policy;

- D. written witness statements;
- E. narratives, notes from, and audio, video, or digital recordings of witness interviews/statements;
- F. e-mails, texts, and social media posts that directly relate to or constitute evidence pertaining to an alleged violation of this policy (i.e., not after-the-fact commentary about or media coverage of the incident);
- G. notes and summaries prepared contemporaneously by the investigator in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.), but not including transitory notes whose content is otherwise memorialized in other documents;
- H. written disciplinary sanctions issued to students or employees and other documentation that memorializes oral disciplinary sanctions issued to students or employees for violations of this policy;
- I. dated written determinations/reports (including summaries of relevant exculpatory and inculpatory evidence) and other documentation that memorializes oral notifications to the parties concerning the outcome of the investigation, including any consequences imposed as a result of a violation of this policy;
- J. documentation of any supportive measures offered and/or provided to the Complainant and the Respondent, including no contact orders issued to both parties, the dates the no contact orders were issued, and the dates the parties acknowledged receipt of the no contact orders;
- K. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects;
- L. copies of the Board policy and procedures/guidelines used by the District to conduct the investigation and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Codes of Conduct and/or Employee Handbooks);
- M. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- N. documentation of any training provided to District personnel related to this policy including, but not limited to notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conduct an investigation of an alleged violation of this policy;
- O. ~~) documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms;(-~~
- P. ~~) copies of any notices sent to the Respondent of the allegations constituting a potential violation of this policy;(-~~
- Q. ~~) copies of any notices sent to the Complainant and the Respondent in advance of any interview or meeting;(-~~
- R. ~~) copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report and any written responses submitted by the Complainant or the Respondent.(-~~

The documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal (e.g., FERPA, ADA) and/or State law, such as student records and confidential medical records.

The documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years and longer if required by the District's records retention schedule.

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Legal 29 U.S.C. 794, Section 504 Rehabilitation Act of 1973, as amended
 42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended
 29 C.F.R. Part 1630
 34 C.F.R. Part 104



Book	Policy Manual
Section	Second Reading by Board
Title	EMPLOYEE ANTI-HARASSMENT
Code	po3362
Status	Second Reading
Adopted	November 17, 2021

3362 - **EMPLOYEE ANTI-HARASSMENT**

Prohibited Harassment

The Board is committed to a work environment that is free of harassment of any form. The Board will not tolerate any form of harassment and will take all necessary and appropriate action to eliminate it. Any member of the School District community who violates this policy will be subject to disciplinary action, up to and including termination of employment. Additionally, appropriate action will be taken to stop and otherwise deal with any third party who engages in harassment against our employees.

The Board will vigorously enforce its prohibition against harassment based on race, color, national origin, age, sex (including transgender status, change of sex, sexual orientation, or gender identity), pregnancy, creed or religion, genetic information, handicap or disability, marital status, citizenship status, veteran status, military service (as defined in 111.32, Wis. Stats.), ancestry, arrest record, conviction record, use or non-use of lawful products off the District’s premises during non-working hours, declining to attend an employer-sponsored meeting or to participate in any communication with the employer about religious matters or political matters (collectively, "Protected Classes"), or any other characteristic protected by law in its employment practices (hereinafter referred to as "harassment" "Protected Classes Characteristics"), and encourages those within the School District community as well as Third Parties, who feel aggrieved to seek assistance to rectify such problems. The Board prohibits harassment that affects tangible job benefits, interferes unreasonably with an individual’s work performance, or creates an intimidating, hostile, or offensive working environment. Harassment may occur employee-to-employee, employee-to-student, male-to-female, female-to-male, male-to-male, or female-to-female.

The Board will investigate all allegations of harassment and, in those cases where harassment is substantiated, the Board will take immediate steps calculated to end the harassment, prevent its reoccurrence, and, if applicable, remedy its effects.

Individuals who are found to have engaged in harassment will be subject to appropriate disciplinary action.

~~[] The District will offer counseling services to any person found to have been subjected to harassment and, where appropriate, the person(s) who committed the harassment.~~

~~For purposes of this policy, "School District community" means individuals subject to the control and supervision of the Board including, but not limited to, students, teachers, staff, volunteers, and Board members, agents, contractors, or other persons.~~

~~For purposes of this policy, "third parties" include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with the District, and other individuals who come in contact with members of the School District community at school related events/activities (whether on or off School District property).~~

Notice

Notice of the Board's policy on anti-harassment related to employment practices and the identity of the District's Compliance Officers will be posted throughout the District and published in any District statement regarding the availability of employment, staff handbooks, and general information publications of the District as required by Federal and State law and this policy.

Definitions

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

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Complainant: is the individual who alleges, or is alleged, to have been subjected to harassment, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged harassment.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Respondent: is the individual who has been alleged to have engaged in harassment, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged harassment.

School District community: means students and Board employees (i.e., administrators, and professional and support staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties: include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

Bullying

Bullying rises to the level of harassment when one or more persons systematically and chronically inflict physical hurt or psychological distress on one (1) or more students or employees and that bullying is based upon one (1) or more Protected Classes, that is, characteristics that are protected by Federal civil rights laws. It is defined as any unwanted and repeated written, verbal, or physical behavior, including any threatening, insulting, or dehumanizing gesture, by an adult or student, that is severe or pervasive enough to create an intimidating, hostile, or offensive educational or work environment; cause discomfort or humiliation; or unreasonably interfere with the individual's school or work performance or participation; and may involve:

- A. teasing;
- B. threats;
- C. intimidation;
- D. stalking;
- E. cyberstalking;
- F. cyberbullying;
- G. physical violence;
- H. theft;
- I. sexual, religious, or racial harassment;
- J. public humiliation; or
- K. destruction of property.

~~"Harassment" means any threatening, insulting, or dehumanizing gesture, use of data or computer software, or written, verbal or physical conduct directed against a school employee on the basis of the employee's Protected Classes Characteristics that:~~

- A. ~~places a school employee in reasonable fear of harm to his/her person or damage to his/her property;~~
- B. ~~is sufficiently severe, pervasive, and persistent so as to create a hostile working environment which materially alters the employee's working conditions from the perspective of a reasonable person similarly situated;~~
- C. ~~has the effect of substantially disrupting the orderly operation of a school or any other aspect of the District's operations;~~

"Harassment" also includes "hate speech"—the use of language, behavior, or images/symbols that express prejudice against a particular group or groups on the basis of any protected characteristic(s).

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Examples are:

- A. making statements that promote violence toward a racial or ethnic group;
- B. drawing, displaying, or posting images or symbols of prejudice (e.g., swastikas).

Sexual Harassment

For purposes of this policy and consistent with Pursuant to Title VII of the Civil Rights Act of 1964, and Title IX of the Educational Amendments of 1972, "sexual harassment" is defined as unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct based on sex constitutes sexual harassment when:

- A. a supervisory employee engages in harassing behavior towards a subordinate employee, regardless of whether such conduct creates a hostile work environment;
- B. acquiescence in or submission to such conduct is an explicit or implicit term or condition of employment;
- C. an individual's acquiescence in, submission to, or rejection of such conduct becomes the basis for employment decisions affecting that individual;
- D. such conduct is sufficiently severe, pervasive, and persistent such that it has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment;
- E. consensual sexual relationships where such relationship leads to favoritism of a subordinate employee with whom the superior is sexually involved and where such favoritism results in an adverse employment action for another employee or otherwise creates a hostile work environment;
- F. inappropriate boundary invasions by a District employee or other adult member of the District into a student's personal space and personal life.

Sexual harassment may involve the behavior of a person of any either gender against a person of the same or another opposite gender.

Sexual Harassment covered by Policy 2266/AG 2266 – Nondiscrimination on the Basis of Sex in Education Programs or Activities, i.e., sexual harassment prohibited by Title IX, is not included in this policy. Allegations of such conduct shall be addressed solely by Policy 2266/AG 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities.

Prohibited acts that constitute sexual harassment under this policy may take a variety of forms. Examples of the kinds of conduct that may constitute sexual harassment include, but are not limited to:

- A. unwelcome sexual propositions, invitations, solicitations, and flirtations;
- B. unwanted physical and/or sexual contact assault;
- C. threats or insinuations that a person's employment, wages, promotion, assignments, or other conditions of employment may be adversely affected by not submitting to sexual advances;
- D. unwelcome verbal expressions of a sexual nature, including graphic sexual commentaries about a person's body, dress, appearance, or sexual activities; the unwelcome use of sexually degrading language, profanity, jokes or innuendoes; unwelcome suggestive or insulting sounds or whistles; obscene telephone calls, text messages, or social media postings;
- E. sexually suggestive objects, pictures, graffiti, videos videotapes, posters, audio recordings, or literature, placed in the work or educational environment that reasonably may embarrass or offend individuals; ~~remarks speculating about a person's sexual activities or sexual history, or remarks about one's own sexual activities or sexual history;~~
- F. unwelcome and inappropriate touching, patting, or pinching; obscene gestures;

- G. asking or telling about sexual fantasies, sexual preferences, or sexual activities;
- H. speculation about a person's sexual activities or sexual history or remarks about one's own sexual activities or sexual history; 121
- I. giving unwelcome personal gifts, such as lingerie, that suggest the desire for a romantic relationship;
- J. leering or staring at someone in a sexual way, such as staring at a person's breasts, buttocks, or groin;
- K. consensual sexual relationships where such relationship leads to favoritism of a subordinate employee with whom the superior is sexually involved and where such favoritism adversely affects other employees or otherwise creates a hostile work environment; ~~and~~
- L. inappropriate boundary invasions by a District employee or other adult member of the School District community into a student's personal space and personal life; and
- M. verbal, nonverbal or physical aggression, intimidation, or hostility based on sex or sex-stereotyping that does not involve conduct of a sexual nature.

Sexual relationships between staff members, where one staff member has supervisory responsibilities over the other, are discouraged as a matter of Board policy. Such relationships have an inherent possibility of being construed as sexual harassment because the consensual aspect of the relationship may be the result of implicit or explicit duress caused by uncertainty regarding the consequences of non-compliance.

Romantic or sexual relationships between District staff (teachers, aides, administrators, coaches or other school authorities) and a student is expressly prohibited. Any school staff member who engages in sexual conduct with a student may also be guilty of a crime and any information regarding such instances will be reported to law enforcement authorities.

Boundary Invasions

Boundary invasions may be appropriate or inappropriate. Appropriate boundary invasions make medical or educational sense. For example, a teacher or aide assisting a kindergartner after a toileting accident or a coach touching a student during wrestling or football can be appropriate. However, other behaviors might be going too far, are inappropriate and may be signs of sexual grooming. Inappropriate boundary invasions may include, but are not limited to the following:

- A. hugging, kissing, or other physical contact with a student;
- B. telling sexual jokes to students;
- C. engaging in talk containing sexual innuendo or banter with students;
- D. talking about sexual topics that are not related to curriculum;
- E. showing pornography to a student;
- F. taking an undue interest in a student (i.e. having a "special friend" or a "special relationship");
- G. initiating or extending contact with students beyond the school day for personal purposes;
- H. using e-mail, text messaging, or websites to discuss personal topics or interests with students;
- I. giving students rides in the staff member's personal vehicle or taking students on personal outings without administrative approval;
- J. invading a student's privacy (e.g. walking in on the student in the bathroom, locker-room, asking about bra sizes or previous sexual experiences);
- K. going to a student's home for non-educational purposes;
- L. inviting students to the staff member's home without proper chaperones (i.e. another staff member or parent of student);
- M. giving gifts or money to a student for no legitimate educational purpose;
- N. accepting gifts or money from a student for no legitimate educational purpose;

- O. being overly "touchy" with students;
- P. favoring certain students by inviting them to come to the classroom at non-class times;
- Q. getting a student out of class to visit with the staff member;
- R. providing advice to or counseling a student regarding a personal problem (i.e. problems related to sexual behavior, substance abuse, mental or physical health, and/or family relationships, etc.), unless properly licensed and authorized to do so;
- S. talking to a student about problems that would normally be discussed with adults (i.e. marital issues);
- T. being alone with a student behind closed doors without a legitimate educational purpose;
- U. telling a student "secrets" and having "secrets" with a student;
- V. other similar activities or behavior.

Inappropriate boundary invasions are prohibited and must be reported promptly to one of the District Compliance Officers, as designated in this policy, the Building Principal or the Superintendent.

Religious (Creed) Harassment

Prohibited religious harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's religion or creed and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's religious tradition, clothing, or surnames, and/or involves religious slurs.

National Origin/Ancestry Harassment

Prohibited national origin/ancestry harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's national origin or ancestry and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's national origin or ancestry, such as negative comments regarding customs, manner of speaking, language, surnames, or ethnic slurs.

Age Harassment

Prohibited age-based harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's age, being over age forty (40), and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment.

Race/Color Harassment

Prohibited race/color based harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's race and/or color and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's race or color, such as racial slurs, nicknames implying stereotypes, epithets, and/or negative references regarding racial customs.

Disability Harassment

Prohibited disability harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's disability, perceived disability, or record of disability, and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's current or past disability ~~disabling condition~~ or a perceived condition, such as negative comments about speech patterns, movement, physical impairments or defects/appearances, or the like. Such harassment may further occur where conduct is directed at or pertains to a person's genetic information.

Anti-Harassment Compliance Officers

The following individual(s) shall serve as the District's Anti-Harassment Compliance Officer(s) (hereinafter, "the Compliance Officer(s)" or "CO" "COs"):

Dr. Kimberly Hall
 Director of Human Resources
 1699 Schofield Ave., Suite 300
 Schofield, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets Assistant Superintendent
 Business/Personnel Services
 1699 Schofield Ave., Suite 300
 Schofield, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public and on the School District's website.

The Compliance Officer(s) are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding harassment.

Reports and Complaints of Harassing Conduct

The Compliance Officer(s) will be available during regular school/work hours to discuss concerns related to harassment, to assist students, other members of the District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct, or to intercede informally on behalf of the individual in those instances where concerns have not resulted in the filing of a formal complaint and where all parties are in agreement to participate in an informal process.

Compliance Officers shall accept reports of harassment directly from any member of the School District community or a Third Party or receive reports that are initially filed with an administrator, supervisor, or other District-level official. Upon receipt of a report of alleged harassment, the Compliance Officer(s) will contact the Complainant and begin either an informal or formal complaint process (depending on the request of the Complainant or the nature of the alleged harassment), or Option 1 the CO(s) will designate a specific individual to conduct such a process as identified in a pre-defined list of investigators. Option 2 the Superintendent will designate a specific individual to conduct the process necessary for an informal or formal investigation. [END OF OPTION 2] The Compliance Officer(s) will provide a copy of this policy to the Complainant and Respondent. In the case of a formal complaint, the Compliance Officer(s) will prepare recommendations for the Superintendent or will oversee the preparation of such recommendations by a designee. All Board employees must report incidents of harassment that are reported to them to the Compliance Officer within two (2) days of learning of the incident.

Any Board employee who directly observes harassment is obligated, in accordance with this policy, to report such observations to the Compliance Officer(s) within two (2) days. Additionally, any Board employee who observes an act of harassment is expected to intervene to stop the harassment, unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other Board employees and/or local law enforcement officials, as necessary, to stop the harassment. Thereafter, the Compliance Officer(s) or designee must contact the Complainant, if age eighteen (18) or older, or Complainant's parents/guardians if the Complainant is under the age eighteen (18), within two (2) days to advise of the Board's intent to investigate the alleged wrongdoing.

Members of the School District community ~~and third parties, which includes all staff,~~ along with Third Parties are encouraged to promptly report incidents of harassing conduct to an administrator, supervisor or other District official so that the Board may address the conduct before it becomes severe, pervasive, or persistent. Any administrator, supervisor, or other District official who receives such a ~~report/complaint~~ shall file it with the ~~District's~~ Compliance Officer within two (2) days of receiving the report of harassment at his/her first opportunity.

Members of the School District community and Third Parties~~or third parties~~ who believe they have been harassed by another member of the School District community or a ~~Third Party~~third party are entitled to utilize the Board's complaint process that is set forth below. Initiating a complaint, whether formally or informally, will not adversely affect the ~~Complainant's/complaining individual's~~ employment unless the complaining individual makes the complaint maliciously or with the knowledge that it is false.

Reporting procedures are as follows:

- A. Any employee who believes s/he has been the victim of harassment prohibited under this policy is encouraged to report the alleged harassment to the appropriate school official as identified in D below.

- B. Teachers, administrators, and other District officials who have knowledge of or receive notice that an employee has or may have been the victim of harassment prohibited under this policy shall immediately report the alleged harassment to the appropriate school official as defined in D below.
- C. Any other person with knowledge or belief that an employee has or may have been the victim of harassment prohibited by this policy shall be encouraged to immediately report the alleged acts to an appropriate school official as identified in D below.
- D. Appropriate District officials are as follows:
1. Any complaint under this policy shall be reported to the District's Compliance Officer unless the complaint is regarding the Compliance Officer. In such cases, the complaints shall be reported to the Superintendent, who will coordinate with the other appointed/designated CO, or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO. for such complaints.
 2. Any complaint under this policy regarding the Superintendent or Board Member that is received by the District Compliance Officer shall be referred to the Board's legal counsel, who shall assume the role of the District Compliance Officer for such complaints.
- E. The reporting party or Complainant shall be encouraged to use a report form available from the Principal of each building or available from the District office, but oral reports shall be considered complaints as well. Use of formal reporting forms shall not be mandated. However, all oral complaints shall be reduced to writing. Further, nothing in this policy shall prevent any person from reporting harassment directly to the Superintendent or other supervisory employee.
- F. To provide individuals with options for reporting harassment to an individual of the gender with which they feel most comfortable, the District shall designate both a male and a female District Compliance Officer.

If during an investigation of alleged bullying, aggressive behavior, and/or harassment in accordance with Policy 5517.01 - Bullying, the Principal believes that the reported misconduct may have created a hostile work environment and may have constituted discriminatory harassment based on a Protected Class, the Principal shall report the act of bullying, aggressive behavior and/or harassment to the Compliance Officer(s) who shall investigate the allegation in accordance with this policy. If the alleged harassment involves Sexual Harassment as defined by Policy 2266, the matter will be investigated in accordance with the grievance process and procedures outlined in Policy 2266. While the Compliance Officer investigates the allegation, or the matter is being addressed pursuant to Policy 2266, the Principal shall suspend the Policy 5517.01 investigation to await the Compliance Officer's written report or the determination of responsibility pursuant to Policy 2266. The Compliance Officer shall keep the Principal informed of the status of the Policy 1662 investigation and provide the Principal with a copy of the resulting written report. Likewise, the Title IX Coordinator will provide the Principal with the determination of responsibility that results from the Policy 2266 grievance process.

~~A CO will be available during regular school/work hours to discuss concerns related to harassment, to assist students, other members of the School-District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct.~~

~~The COs are assigned to accept complaints of harassment directly from any member of the School-District community or a visitor to the District or to receive complaints that are initially filed with a school building administrator. Upon receipt of a complaint either directly or through a school building administrator, a CO will begin either an investigation or the CO will designate a specific individual to conduct such a process. The CO will prepare recommendations or will oversee the preparation of such recommendations. All members of the School District community should report incidents of harassment that are reported to them to the CO within two (2) business days of learning of the incident.~~

Investigation and Complaint Procedure

Except for Sexual Harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Program or Activities, aAny employee or other member of the School District community or Third Party (e.g., visitor to the District) who believes that they have/he has been subjected to harassment or has witnessed harassment of another may seek resolution of the his/her complaint through the procedures ~~as~~ described below. The complaint process involves an investigation of the Complainant's claims of harassment or retaliation and a process for rendering a decision regarding whether the charges are substantiated. Further, a process for investigating claims of harassment and a process for rendering a decision regarding whether the claim of harassment was substantiated are set forth below.

~~Once the complaint process begins, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) business days of the complaint being received).~~

The procedures set forth below are not intended to interfere with the rights of any individual to pursue a complaint of harassment or retaliation with the United States Department of Education Office for Civil Rights ("OCR"), the Wisconsin Equal Rights Division, and/or Equal Employment Opportunity Commission ("EEOC"). The Chicago Office of the OCR can be reached at John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL 60604; Telephone: 312-730-1560; FAX: 312-730-1576; TDD: 800-877-8339; Email: OCR.Chicago@ed.gov; Web: <http://www.ed.gov/ocr>.

Complaint Procedure

A Complainant An individual who believes s/he has been subjected to harassment hereinafter referred to as the "Complainant," who alleges harassment based on a protected class or retaliation may file a complaint, either orally or in writing: 1) with a teacher, Principal; 2) directly to one of the COs; or 3) to the Superintendent, or other supervisory employee. As noted above, any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall assume the role of the CO for such complaints. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who may will consult, in consultation with the other appointed/designated CO, if any, and if necessary, appoint/designate another individual to serve in the role of CO assume the role of the CO for such a complaint regarding a CO.

Due to the sensitivity surrounding complaints of harassment and retaliation, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a complaint within thirty (30) calendar days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a Principal, Superintendent, or other supervisory employee, either orally or in writing, about any complaint of discrimination or retaliation, that employee must report such information to the CO within two (2) business days.

Throughout the course of the process as described herein, the CO should keep the parties reasonably informed of the status of the investigation and the decision-making process.

All written complaints must include the following information to the extent known it is available: the identity of the Respondent individual believed to have engaged in, or be actively engaging in, harassment; a detailed description of the facts upon which the complaint is based (i.e., when, where, and what occurred); and a list of potential witnesses; and the resolution sought by the Complainant.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the CO shall ask for such details in an oral interview. Thereafter the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken in the investigatory phase to protect the Complainant from further harassment or retaliation including but not limited to a change of work assignment or schedule for the Complainant and/or the Respondent alleged harasser. In making such a determination, the CO should consult the Complainant to assess whether the individual agrees with his/her position to the proposed action. If the Complainant is unwilling to consent to the proposed change, the CO may still take whatever actions deemed s/he deems appropriate in consultation with the Superintendent. No temporary arrangements shall be disciplinary to either the Complainant or Respondent.

Within two (2) business days of receiving a complaint, the CO will inform the Respondent individual alleged to have engaged in the harassing or retaliatory conduct, hereinafter referred to as the "Respondent", that a complaint has been received.

The Respondent is not entitled to receive a copy of any written complaint unless the CO determines it is appropriate to do so; however, the Respondent will be informed about the nature of the allegations. The CO shall inform the Respondent of the requirements of this policy, which may include providing the Respondent with a copy of this policy or information about where to find it. Respondent shall be afforded the opportunity to submit a written response to the complaint. The CO shall inform the Respondent of the Respondent's deadline to provide the CO with the written response to the allegations in the complaint.

Within five (5) days of receiving the complaint, the CO will initiate an investigation by at a minimum confirming receipt of the complaint with the Complainant and informing the Complainant of the investigation process.

Investigations shall be completed promptly. What constitutes promptness will depend on the complexity of the issues, the number of incidents or factual elements, the number of witnesses and documents to be consulted, and the availability of witnesses and other evidence. The CO shall keep the Complainant reasonably informed of the investigation's progress. [END-OF-OPTIONS]

Within five (5) business days of receiving the complaint, the CO will initiate a formal investigation to determine whether the Complainant has been subject to offensive conduct/harassment.

Although certain cases may require additional time, the CO will attempt to complete an investigation into the allegations of harassment within fifteen (15) calendar days of receiving the formal complaint. The investigation will include:

- A. interview(s) with the Complainant;

- B. interview(s) with the Respondent;
- C. interviews with any other witnesses who may reasonably be expected to have any information relevant to the allegations, as determined by the CO; 126
- D. consideration of any documentation or other evidence presented by the Complainant, Respondent, or any other witness which is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO or designee shall prepare and deliver a written report to the Superintendent that summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definition of harassment as provided in this policy and State and Federal law as to whether the Respondent engaged in harassment of or retaliation toward the Complainant. ~~Complainant has been subjected to harassment.~~ The CO's recommendations must be based upon the totality of the circumstances, including the ages and maturity levels of those involved. In determining if discriminatory harassment or retaliation occurred, a preponderance of evidence standard will be used.

The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.

In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation, the CO may in consultation with the Superintendent or Board President, if the matter involves the Superintendent engage outside legal counsel to conduct the investigation consistent with this policy.

Absent extenuating circumstances, within five (5) ~~business~~ days of receiving the report of the CO, the Superintendent must either issue a ~~written final~~ decision regarding whether or not the complaint of harassment has been substantiated or request further investigation. A copy of the Superintendent's final decision will be delivered to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within five (5) ~~business~~ days. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above.

If the Superintendent determines the Respondent engaged in harassment of or retaliation toward the Complainant, the Superintendent must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the harassment or retaliation. The corrective action should be reasonable, timely, age-appropriate, effective, and tailored to the specific situation.

The decision of the Superintendent shall be final. If the investigation results in disciplinary action, the employee subject to discipline is entitled to file a grievance pursuant to Board Policy 3340. Nothing in this policy shall be construed to prevent an employee from bringing a complaint before the Equal Employment Opportunity Commission or the Wisconsin Equal Rights Division.

The Board reserves the right to investigate and resolve a complaint or report of harassment regardless of whether the member of the School District community or Third Party alleging the harassment pursues the complaint. The Board also reserves the right to have the formal complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board.

The parties may be represented, at their own cost, at any of the above-described meetings/hearings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint procedure is not a prerequisite to the pursuit of other remedies.

All timelines pertinent to the investigation process are intended to be guidelines to assure that the investigation proceeds with all deliberate efficiency. Failure of the CO to meet any specific timeline does not invalidate the investigation or provide a defense to the allegations.

Privacy/Confidentiality

The ~~School~~ District will employ reasonable efforts to protect the rights of the Complainant, the Respondent(s), and all the witnesses as much as possible, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery or disclosure obligation in an investigation of harassment. The School District will respect the privacy of the Complainant, the Respondent, and all witnesses in a manner consistent with the School District's legal obligations under State and Federal law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided with the Complainant's identity. All Complainants proceeding through the formal investigation process should be advised that their identities may be disclosed to the respondent.

During the course of an investigation, the CO will determine whether confidentiality during the investigation process is necessary to protect the interests and reputations of those involved and/or to protect the integrity of the investigation and if so, shall instruct all members of the School District community and third parties who are interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of a harassment investigation is expected not to disclose any information that is learned or provided s/he learns or that s/he provides during the course of the investigation.

Directives During Investigation

The CO may recommend to the Superintendent placing any employee involved in an investigation under this Policy on administrative leave pending resolution of the matter. If the Superintendent is the Respondent, the CO shall make such recommendation to the Board. Administrative leave may be appropriate in situations in which protecting the safety of any individual or the integrity of the investigation necessitates such action.

The CO shall determine whether any witnesses in the course of an investigation should be provided a *Garrity* warning apprising the person of his/her obligations to answer questions truthfully and honestly while preserving the right against self-incrimination in the context of any resulting criminal investigation or prosecution.

Every employee interviewed in the course of an investigation is required to provide truthful responses to all questions. Failure to do so may result in disciplinary action.

Remedial Action ~~Sanctions~~ and Monitoring

~~The Board shall vigorously enforce its prohibitions against harassment by taking appropriate action reasonably calculated to stop the harassment and prevent further such harassment.~~

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to because of the discrimination, or other appropriate action.

The Board may appoint an individual, who may be an employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against harassment/retaliation by taking appropriate action reasonably calculated to stop the harassment and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee. All disciplinary action will be taken in accordance with applicable law.

When imposing discipline, the Superintendent shall consider the totality of the circumstances. In those cases where harassment is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior disciplinary action has been taken against the Respondent, all ~~all~~ subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its reoccurrence, and remedy its effects.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging harassment/retaliation or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made by any Federal or State civil rights law, or because that individual made a report, formal complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Allegations Constituting Criminal Conduct

If the CO has reason to believe that the Complainant has been the victim of criminal conduct, such knowledge should be reported to local law enforcement. After such report has been made, the Superintendent shall be advised that local law enforcement was notified.

If the Complainant has been the victim of criminal conduct and the accused is the Superintendent, such knowledge should be reported by the CO to local law enforcement. After such report has been made, the Board Attorney shall be advised that local law enforcement was notified.

Any reports made to local law enforcement shall not terminate the COs obligation and responsibility to continue to investigate a complaint of harassment. While the COs may work cooperatively with outside agencies to conduct concurrent investigations, the harassment investigation shall not be stopped due to the involvement of outside agencies without good cause after consultation with the Superintendent.

Reprisal

Submission of a good faith complaint or report of harassment will not affect the Complainant's or reporter's work status or work environment. However, the Board also recognizes that false or fraudulent claims of harassment or false or fraudulent information about such claims may be filed. The Board reserves the right to discipline any person filing a false or fraudulent claim of harassment or false or fraudulent information about such a claim.

The District will discipline or take appropriate action against any member of the School District community who retaliates against any person who reports an incident of harassment prohibited by this policy or participates in a proceeding, investigation, or hearing relating to such harassment. Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment.

Miscellaneous

The District shall conspicuously post a notice including this policy against harassment in each school in a place accessible to the School District community and members of the public. This notice shall also include the name, mailing address, and telephone number of the COs, the name, mailing address, and telephone number of the State agency responsible for investigating allegations of discrimination in educational employment, and the mailing address and telephone number of the United States Equal Opportunity Employment Commission.

A link to this policy and any related administrative guidelines shall appear in the employee handbook and a copy shall be made available upon request of employees and other interested parties.

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of harassment. The Superintendent shall provide appropriate information to all members of the School District community related to the implementation of this policy and shall provide training for District staff at such times as the Board in consultation with the Superintendent determines is necessary or appropriate.

The Board will respect the privacy of the Complainant, the individuals against whom the complaint is filed, and the witnesses as much as practicable, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery, disclosure, or other legal obligations.

Retention of Investigatory Records and Materials

The CO(s) is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all ~~information,~~ documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include ~~including,~~ but are not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;
- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;

- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
- F. all documentary evidence;
- G. e-mails, texts, or social media posts pertaining to the investigation;
- H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
- I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;
- J. dated written determinations to the parties;
- K. dated written descriptions of verbal notifications to the parties;
- L. written documentation of any ~~supportive~~interim measures offered and/or provided to Complainant and/or the Respondent~~Complainants~~, including no contact orders issued to both parties, the dates issued, and the dates the parties acknowledged receipt; and
- M. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects.
- N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Code of Conduct and/or Employee Handbooks);
- O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy.†
- Q. ~~) documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms;(-~~
- R. ~~copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy;)(-~~
- S. ~~) copies of any notices sent to the Complainant and the Respondent in advance of any interview, meeting, or hearing;(-~~
- T. ~~copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.)(-~~

The ~~information,~~ documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The ~~information,~~ documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

~~Revised 4/24/19~~
~~T.C. 6/22/20~~

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Legal	111.31, 118.195, 118.20, Wis. Stats. 29 U.S.C. 621 et seq., Age Discrimination in Employment Act of 1967 29 U.S.C. 794, Rehabilitation Act of 1973 42 U.S.C. 1983 42 U.S.C. 2000d et seq., Title VI of the Civil Rights Act of 1964 42 U.S.C. 2000e et seq., Title VII of the Civil Rights Act of 1964 42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act 42 U.S.C. 6101 et seq., Age Discrimination Act of 1975 42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended 29 C.F.R. Part 1635 National School Boards Association Inquiry and Analysis - May 2008	130
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Cross References [3363F - Discrimination/Harassment Complaint Form](#)

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	NONDISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY
Code	po4122
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	6/22/2020, 04/24/2019

4122 - NONDISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY

The Board does not discriminate in the employment of support staff on the basis of ~~the Protected Classes of~~ race, color, national origin, age, sex (including ~~trans~~gender status, change of sex, sexual orientation, or gender identity), pregnancy, creed or religion, genetic information, handicap or disability, marital status, citizenship status, veteran status, military service (as defined in 111.32, Wis. Stats.), ancestry, arrest record, conviction record, use or non-use of lawful products off the District’s premises during non-working hours, declining to attend an employer-sponsored meeting or to participate in any communication with the employer about religious matters or political matters, or any other legally protected category in its programs and activities, including employment opportunities characteristic protected by law in its employment practices.

Notice of the Board's policy on nondiscrimination and the identity of the School District's Compliance Officer(s) (see below) will be published on the District's website, posted throughout the District, and included in the District's recruitment statements or general information publications.

Definitions

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

Complainant is the individual who alleges, or is alleged, to have been subjected to discrimination/retaliation, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged discrimination/retaliation.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Military status: refers to a person's status in the uniformed services, which includes the performance of duty on a voluntary or involuntary basis in a uniformed service, including active duty, active duty for training, initial active duty for training, inactive duty for training, full-time National Guard duty, and performance of duty or training by a member of Wisconsin organized militia. It also includes the period of time for which a person is absent from employment for the purpose of an examination to determine the fitness of the person to perform any duty listed above.

Respondent is the individual who has been alleged to have engaged in discrimination/retaliation, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged discrimination/retaliation.

School District community means students and Board employees (i.e., administrators, and professional and support staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals

who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

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District Compliance Officers

The Board designates the following individuals to serve as the District's "Compliance Officers" (also known as "Civil Rights Coordinators"; hereinafter referred to as the "COs").

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets, Assistant Superintendent
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public.

The COs are responsible for coordinating the District's efforts to comply with the applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding discrimination, retaliation, or denial of equal access. The COs shall also verify that proper notice of nondiscrimination has been provided for Title II of the Americans with Disabilities Act (as amended), Title VI and Title VII of the Civil Rights Act of 1964, ~~Title IX of the Education Amendment Act of 1972,~~ Section 504 of the Rehabilitation Act of 1973 (as amended), the Age Discrimination in Employment Act of 1975, and the Genetic Information Nondiscrimination Act (GINA) to students, their parents, staff members, and the general public. (X) Any sections of the District's postings, notifications, advertisements, or other materials regarding recruiting, hiring, and promotion need to contain a statement of nondiscrimination similar to that in the Board's statement above. In addition, any gender-specific terms should be eliminated from these materials.~~A copy of each of the Acts and regulations on which this notice is available upon request from the CO.~~

Reports and Complaints of ~~Unlawful~~ Discrimination and Retaliation

Employees are required to~~expected to promptly~~ report incidents of ~~unlawful~~ discrimination and/or retaliation to an administrator, supervisor, or other supervisory employees so that the Board may address the conduct. Any administrator, supervisor, or other supervisory employees who receive such a report~~complaint~~ shall file it with the CO at the employee's~~his/her~~ first opportunity, but no later than two (2) ~~business~~ days.

Discrimination against an individual based on their sex (including gender status, sexual orientation, and gender identity) is discrimination in violation of Title VII. Specifically, discrimination on the basis of sex stereotyping/gender-nonconformity constitutes sex discrimination. This is true irrespective of the cause of the person's gender non-conforming behavior. Employment actions based upon an individual's sex could be suspect and potentially impermissible.

COs are required to investigate allegations of conduct involving the discrimination or harassment of an employee or applicant based upon his/her gender status, sexual orientation, and gender identity.

Any questions concerning whether alleged conduct might violate this prohibition should be brought to the CO's attention promptly.

Employees who believe they have been ~~unlawfully~~ discriminated/retaliated against are entitled to utilize the complaint process set forth below. Initiating a complaint will not adversely affect the Complainant's~~complaining individual's~~ employment. While there are no time limits for initiating complaints under this policy, individuals should make every effort to file a complaint as soon as possible after the conduct occurs while the facts are known and potential witnesses are available.

The COs will be available during regular school/work hours to discuss concerns related to ~~unlawful~~ discrimination/retaliation. COs shall accept reports~~complaints~~ of ~~unlawful~~ discrimination/retaliation directly from any member of the School District community or a Third Party,~~or receive reports that are initially filed with another Board employee (District employees, students, parent(s), and member of the Board), a resident of the District, or a visitor to the District.~~ Upon receipt of a report of alleged discrimination/retaliation~~complaint, the either directly or through a school building administrator, a CO will contact the Complainant and begin either an informal or formal complaint process (depending on the Complainant's request and the nature of the alleged discrimination/retaliation) investigation, or [] Option 1 the CO will designate a specific individual to conduct such a process as~~

~~identified in a pre-defined list of investigators. [END OF OPTION 1] [] Option 2 the Superintendent will designate a specific individual to conduct the process necessary for an informal or formal investigation. [END OF OPTION 2] the CO will designate a specific individual to conduct such a process.~~ The CO will provide a copy of this policy to the Complainant and the Respondent ~~133~~ request any person who files a complaint. All members of the School District community must report incidents of discrimination/retaliation that are reported to them to the CO within two (2) business days of learning of the incident/conduct.

Any Board employee who directly observes ~~unlawful~~ discrimination/retaliation is obligated, in accordance with this policy, to report such observations to one of the COs within two (2) business days. Additionally, any Board employee who observes an act of ~~unlawful~~ discrimination/retaliation is expected to intervene to stop the misconduct, unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other Board employees and/or local law enforcement officials, as necessary, to stop the misconduct. Thereafter, the CO must contact the Complainant employee within two (2) business days to advise ~~him/her~~ of the Board's intent to investigate the alleged wrongdoing.

Investigation and Complaint Procedure

Except for sex discrimination and/or sexual harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities, any employee who alleges to have been ~~Any employee who believes that s/he has been~~ subjected to ~~unlawful~~ discrimination or retaliation may seek resolution of the his/her complaint through the procedures described below. The complaint procedures involve an investigation of the individual's claims of discrimination/retaliation and a process for rendering a decision regarding whether the charges are substantiated.

Once the complaint process begins, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) ~~business~~ days of the complaint being received).

The procedures set forth below are not intended to interfere with the rights of any individual to pursue a complaint of ~~unlawful~~ discrimination or retaliation with the United States Department of Education Office for Civil Rights, the Wisconsin Equal Rights Division, or the Equal Employment Opportunity Commission ("EEOC").

Complaint Procedure

A Complainant who alleges discrimination/retaliation ~~An individual who believes s/he has been subjected to unlawful discrimination/retaliation (hereinafter referred to as the "Complainant"),~~ may file a complaint, either orally or in writing, ~~;~~ 1) with a Principal; 2) the CO; ~~;~~ or 3) to the Superintendent or other supervisory employees. Any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall assume the role of the CO for such complaints. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who shall coordinate with the other appointed/designated ~~assume the role of~~ CO or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO. for such complaints.

Due to the sensitivity surrounding complaints of ~~unlawful~~ discrimination and retaliation, timelines are flexible for initiating the complaint process; however, individuals are encouraged ~~should make every effort~~ to file a complaint within thirty (30) ~~calendar~~ days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a Principal, Superintendent, or other supervisory employees, either orally or in writing, about any complaint of discrimination or retaliation, that employee must report such information to the CO at the employee's first opportunity, but no later than ~~within~~ two (2) ~~business~~ days.

Throughout the course of the process, the CO should keep the parties reasonably informed of the status of the investigation and the decision-making process.

All complaints must include the following information to the extent known it is available: the identity of the Respondent individual ~~believed to have engaged in, or be engaging in, the discriminatory/retaliatory conduct~~; a detailed description of the facts upon which the complaint is based (i.e., when, where, and what occurred); a list of potential witnesses; and the resolution sought by the Complainant.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the CO shall ask for such details in an oral interview. Thereafter, the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken in the investigatory phase to protect the Complainant from further discrimination or retaliation, including ~~;~~ but not limited to ~~;~~ a change of work assignment or schedule for the Complainant and/or the Respondent person who allegedly engaged in the misconduct. In making such a determination, the CO should consult the Complainant to assess whether the individual agrees with his/her position to the proposed action. If the Complainant is unwilling to consent to the proposed change, the CO may still may take whatever actions are deemed ~~s/he deems~~ appropriate in consultation with the Superintendent.

Within two (2) days of receiving the complaint, the CO or designee will initiate an investigation by at a minimum confirming receipt of the complaint with the Complainant and informing the Complainant of the investigation process. ~~Within two (2) business days of~~

~~receiving the complaint, the CO will initiate an investigation to determine whether the Complainant has been subjected to unlawful discrimination/retaliation.~~

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Simultaneously, the CO will inform the ~~Respondent that a formal individual alleged to have engaged in the discriminatory or retaliatory conduct (hereinafter referred to as the "Respondent"), that a~~ complaint has been received. The Respondent will be informed about the nature of the allegations and ~~upon request~~ provided with a copy of any relevant policies and/or administrative guidelines, including this Policy. The Respondent must also be informed of the opportunity to submit a written response to the complaint ~~and the obligation to do so~~ within five (5) ~~business~~ days.

~~Investigations shall be completed promptly. What constitutes promptness will depend on the complexity of the issues, the number of incidents or factual elements, the number of witnesses and documents to be consulted, and the availability of witnesses and other evidence. The CO shall keep the Complainant reasonably informed of the investigation's progress. [END-OF-OPTIONS]Although certain cases may require additional time, the CO will attempt to complete an investigation into the allegations of discrimination/retaliation within fifteen (15) business days of receiving the formal complaint. The investigation will include:~~

~~The investigation will include:~~

- A. interviews with the Complainant;
- B. interviews with the Respondent;
- C. interviews with any other witnesses who may reasonably be expected to have any information relevant to the allegations, as determined by the CO;
- D. consideration of any documentation or other information presented by the Complainant, Respondent, or any other witness that is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO shall prepare and deliver a written report to the Superintendent that summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definition of ~~unlawful~~ discrimination/retaliation as provided in Board policy and State and Federal law as to whether the ~~Respondent has engaged in harassment/retaliation of the Complainant~~ ~~Complainant has been subjected to unlawful discrimination/retaliation~~. The CO's recommendations must be based upon the totality of the circumstances. In determining if discrimination or retaliation occurred, a preponderance of evidence standard will be used.

~~The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.~~

~~In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation, the CO may in consultation with the Superintendent or Board President, if the matter involves the Superintendent, engage outside legal counsel to conduct the investigation consistent with this policy.~~

Absent extenuating circumstances, within five (5) ~~business~~ days of receiving the report of the CO, the Superintendent ~~either~~ must ~~either~~ issue a ~~written final~~ decision regarding whether the charges have been substantiated or request further investigation. An ~~summary explanation of the copy of~~ the Superintendent's final decision will be ~~provided delivered~~ to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within five (5) ~~business~~ days, ~~or as quickly as possible if additional time is necessary due to the availability of necessary witness(es) or documents~~. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above.

If the Superintendent determines the ~~Respondent engaged in discrimination/retaliation toward the Complainant, the Complainant was subjected to unlawful discrimination/retaliation, s/he~~ must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the discrimination/retaliation. The corrective action should be reasonable, timely, ~~age-appropriate,~~ effective, and tailored to the specific situation.

A Complainant or Respondent who is dissatisfied with the final decision of the Superintendent may appeal through a signed written statement to the Board within five (5) ~~business~~ days of ~~the party's his/her~~ receipt of the Superintendent's ~~final~~ decision. ~~The written statement of appeal must be submitted to the Superintendent, who will forward the request to the Board President.~~

In an attempt to resolve the complaint, the Board shall review the findings and may meet with the concerned parties and their

representatives within twenty (20) ~~business~~ days of the receipt of such an appeal. A copy of the Board's disposition of the appeal shall be sent to each concerned party within ten (10) ~~business~~ days of its decision. The decision of the Board will be final.

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The Board reserves the right to investigate and resolve a complaint or report of ~~unlawful~~ discrimination/retaliation regardless of whether the ~~Complainant employee alleging the misconduct~~ pursues the complaint. The Board also reserves the right to have the complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board or its designee.

The parties may be represented, at their own cost, at any of the above-described interviews/meetings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint ~~process~~ procedure is not a prerequisite to the pursuit of other remedies.

Privacy/Confidentiality

The Board will employ all reasonable efforts to protect the rights of the Complainant, the Respondent(s), and the witnesses as much as possible, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery or disclosure obligations.

All records generated under the terms of this policy shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Respondents must be provided an opportunity to meaningfully respond to allegations, which may include disclosure of the Complainant's identity. ~~Additionally, the Respondent must be provided the Complainant's identity. All Complainants will be advised that their identities may become known to the Respondent(s) through the investigation process.~~

During the course of an investigation, the CO will instruct each person who is interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of an investigation is expected not to disclose to third parties any information that is learned or provided ~~s/he learns and/or provides~~ during the course of the investigation.

Remedial Action ~~Sanctions~~ and Monitoring

~~The Board shall vigorously enforce its prohibitions against unlawful discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct. While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee. All disciplinary action will be taken in accordance with applicable State law. When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter. In those cases where unlawful discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies and/or the Employee Handbook.~~

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to the discrimination, or other appropriate action.

The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and any relevant codes of conduct.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the age and maturity level of any student involved. In those cases where discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior ~~disciplinary~~ remedial action has been taken against ~~the Respondent~~ an employee, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its recurrence, and remedy its effect.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging ~~unlawful~~ discrimination/retaliation, or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made by any Federal or State civil rights law, or because that individual made a report, formal complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy. ~~Specifically, the Board will not retaliate against, coerce, intimidate, threaten or interfere with any individual because the person opposed any act or practice made unlawful by any Federal or State civil rights law, or because that individual made a charge, testified, assisted or participated in any manner in an investigation, proceeding, or hearing under those laws, or because that individual exercised their rights, aided or encouraged any other person in the exercise of any right granted or protected by those laws.~~ 136

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of ~~unlawful~~ discriminatory practices. The Superintendent shall provide appropriate information to all members of the School District community related to the implementation of this policy and shall provide training for District staff where appropriate. All training, as well as all information provided regarding the Board's policy and discrimination in general, will be age and content appropriate.

Retention of Investigatory Records and Materials

The CO is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all ~~information,~~ documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include ~~including,~~ but are not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;
- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;
- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
- F. all documentary evidence;
- G. e-mails, texts, or social media posts pertaining to the investigation;
- H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
- I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;
- J. dated written determinations to the parties;
- K. dated written descriptions of verbal notifications to the parties;
- L. written documentation of any ~~supportive interim~~ measures offered and/or provided to the Complainant and/or the Respondent ~~complainants~~, including no contact orders issued to both parties, the dates issued, and the dates the parties acknowledged receipt; and

- M. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects; 137
- N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Codes of Conduct and/or Employee Handbooks);
- O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy.;
- Q. ~~documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms;)(~~
- R. ~~() copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy;~~
- S. ~~() copies of any notices sent to the Complainant and the Respondent in advance of any interview, meeting, or hearing;~~
- T. ~~() copies of any notices sent to the Complainant and alleged perpetrator in advance of any interview or hearing;~~
- U. ~~() copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.~~

The ~~information,~~ documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The ~~information,~~ documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

~~Revised 10/4/18~~

~~Revised 4/24/19~~

~~T.C. 6/22/20~~

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Legal	111.31 et seq., Wis. Stats.	138
	111.335(d)(2), Wis. Stats.	
	118.195, Wis. Stats.	
	118.20, Wis. Stats.	
	Fourteenth Amendment, U.S. Constitution	
	20 U.S.C. Section 1701 et seq., Equal Educational Opportunities Act of 1974	
	20 U.S.C. Section 7905, Boy Scouts of America Equal Access Act	
	29 U.S.C. 701 et seq., Rehabilitation Act of 1973, as amended	
	38 U.S.C. 4301 et seq., Uniformed Services Employment and Reemployment Rights Act	
	42 U.S.C. 2000 et seq., Civil Rights Act of 1964	
	42 U.S.C. 2000d et seq., Title VI of the Civil Rights Act of 1964	
	42 U.S.C. 2000e et seq., Title VII of the Civil Rights Act of 1964	
	42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act of 1973 as amended	
	42 U.S.C. 6101 et seq., Age Discrimination Act of 1975	
	42 U.S.C. 12101 et seq., The Americans with Disabilities Act of 1990, as amended	
	29 C.F.R. Part 1635, The GINA Regulations	
	34 C.F.R. Part 110, The Age Discrimination Act Regulations	

Cross References [4122F - Discrimination/Harassment Complaint Form](#)

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	NONDISCRIMINATION BASED ON GENETIC INFORMATION OF THE EMPLOYEE
Code	po4122.02
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021

4122.02 - NONDISCRIMINATION BASED ON GENETIC INFORMATION OF THE EMPLOYEE

The Board ~~of Education~~ prohibits discrimination on the basis of genetic information in all aspects of employment, including hiring, firing, compensation, job assignments, promotions, layoffs, training, fringe benefits, or any other terms, conditions, or privileges of employment. The Board also does not limit, segregate, or classify applicants or employees in any way that would deprive or tend to deprive them of employment opportunities or otherwise adversely affect the status of the person as an employee ~~as an employee~~, based on genetic information. Harassment of a person because of his/her genetic information ~~is also~~ is prohibited. Likewise, retaliation against a person for identifying, objecting to, or filing a complaint concerning a violation of this policy ~~an applicant or employee for engaging in protected activity~~ is prohibited.

The identity of the Compliance Officer (see Policy 41222 - Nondiscrimination and Equal Employment Opportunity) shall be posted throughout the District and published in any District statement regarding the prohibition of discrimination on the basis of genetic information in all aspects of employment, in any staff handbooks, and in general information publications of the District as required by Federal and State law and on the District website.

In accordance with Title II of the Genetic Information Nondiscrimination Act of 2008, 42 U.S.C. 2000ff, et seq., and 29 C.F.R. Part 1635 ("GINA"), the Board shall not request, require or purchase genetic information of employees, their family members or applicants for employment. Further, in compliance with GINA this Act, applicants and employees are directed not to provide any genetic information, including the individual's family medical history, in response to necessary requests for medical information, with the exception that family medical history may be provided ~~acquired~~ as part of the certification process for FMLA leave, or when an employee is asking for leave to care for an immediate family member with a serious health condition. Applicants for employment are directed not to provide any genetic information, including the individual's family medical history, in response to requests for medical information as part of the District's application for employment process. Employees and applicants for employment shall not be penalized for providing genetic information in good faith in response to a request from a District employee or agent, unless that applicant or employee refuses to delete the information at the request of the employee or agent of the District.

The ~~Board District~~ recognizes that genetic information may be acquired through commercially and publicly available media ~~including documents like~~ newspapers, books, magazines, periodicals, television shows or the Internet. The ~~Board District~~ prohibits, ~~however,~~ District its employees and agents including commercial background investigation agents from searching these such sources with the intent of finding or obtaining genetic information, or accessing sources from which they are likely to acquire genetic information. If genetic information about an employee or applicant is obtained in error, it shall be redacted immediately and not shared beyond the point of first receipt.

As used in this policy, "Genetic information," ~~as defined by GINA,~~ means information about: (a) an individual's genetic tests; (b) the genetic tests of that individual's family members; (c) the manifestation of disease or disorder in family members of the individual (i.e., family medical history); (d) an individual's request for, or receipt of, genetic services, or the participation in clinical research that includes genetic services by the individual or a family member of the individual; or (e) the genetic information of a fetus carried by an individual or a pregnant woman who is a family member of the individual and the genetic information of an embryo legally held by an individual or family member using assistive reproductive technology.

The term "genetic information" does not include information about the sex or age of the individual, the sex or age of family members, or information about the race or ethnicity of the individual or family member that is not derived from a genetic test.

As used in this policy, "genetic test" means an analysis of human DNA, RNA, chromosomes, proteins, or metabolites that detect genotypes, mutations, or chromosomal changes. The term includes any test of a person's DNA/RNA. 140

If the District's employees or agents District either legally and/or inadvertently receives genetic information about an employee or applicant for employment from the employee, applicant for employment, or a medical provider it shall be treated as a confidential medical record in accordance with law.

The District's Superintendent shall appoint a Compliance Officer (see Policy 4122 - Nondiscrimination and Equal Employment Opportunity) who shall be responsible for overseeing the Board District's compliance with this policy and GINA and proposing revisions and additions to this policy as necessary to ensure the Board's compliance with GINA Federal regulations and promptly dealing with any inquiries or complaints. This person shall be responsible for working with the Board's legal counsel to fully implement the requirements of GINA in all activities of the School District. The Compliance Officer S/He shall also shall verify that proper notice of nondiscrimination for Title II of GINA the Genetic Information Nondiscrimination Act of 2008 is provided to staff members, and that all District requests for health-related information (e.g., to support an employee's request for reasonable accommodation under the ADA or a request for sick leave) are accompanied by a written warning that directs the employee or health care provider not to collect or provide genetic information. The warning shall read as follows:

Genetic Information Nondiscrimination Act of 2008 (GINA) Disclosure Requirement

The Genetic Information Nondiscrimination Act of 2008 or ("GINA") prohibits employers and other entities covered by the law GINA Title II, including the Board of Education, from requesting or requiring genetic information of an employee or applicant individual or family member of an employee or applicant the individual, except as specifically allowed by law. To comply with GINA this law, do not provide any genetic information when responding to this request for medical information (unless the request pertains to a request for FMLA leave for purposes of caring for an immediate family member with a serious health condition). "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic test, the fact that an individual or an individual's family member sought or received genetic services or participated in clinical research that includes genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services. Questions concerning compliance with the requirements of GINA may be directed to the Compliance Officer at 715-359-4221.

The Board District offers health services. Participation in the services/program is voluntary. Genetic information (such as family medical history) may be obtained as part of an individual's participation in the service/program. If that occurs, individual genetic information may be provided to the individual receiving the services and to his/her health services providers, but only genetic information in aggregate form will be provided to the District Board and no applicant or employee shall be identified or identifiable from the reported information.

The grievance procedure for complaints of discrimination in Policy 4122 applies to complaints of discrimination, including harassment, or retaliation prohibited by GINA and may be utilized if an employee alleges discrimination or harassment on the basis of genetic information or retaliation for identifying, objecting to, or filing a complaint concerning a violation of GINA or this policy.

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Legal 42 U.S.C. 2000ff et seq.
Title II, The Genetic Information Nondiscrimination Act of 2008
29 C.F.R. Part 1635

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	SECTION 504/ADA PROHIBITION AGAINST DISABILITY DISCRIMINATION IN EMPLOYMENT
Code	po4123
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	6/22/2020

4123 - SECTION 504/ADA PROHIBITION AGAINST DISABILITY DISCRIMINATION IN EMPLOYMENT

The Board prohibits discrimination against any employee or applicant based upon his/her disability. As such, the Board will not engage in employment practices or adopt policies that discriminate on the basis of disability, or otherwise discriminate against qualified individuals with disabilities in regard to job application procedures, the hiring, advancement or discharge of employees, employee compensation, job training, or other terms, conditions and privileges of employment. The Board further will not limit, segregate or classify applicants or employees in any way that adversely affects their opportunities or status because of disability. Additionally, the Board will not participate in any contractual or other relationships that have the effect of subjecting qualified individuals with disabilities who are applicants or employees to discrimination on the basis of disability.

Notice of the Board's policy on nondiscrimination in employment practices and the identity of the School District's Compliance Officer(s) (see below) will be published on the District's website, posted throughout the District, and included in the District's recruitment statements or general information publications.

Definitions

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

Complainant: is the individual who alleges or is alleged to have been subjected to discrimination/retaliation, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged discrimination/retaliation.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Respondent: is the individual who is alleged to have engaged in discrimination/retaliation, regardless of whether the Complainant files a formal complaint or is seeking an informal resolution to the alleged discrimination/retaliation.

District community: means students, District employees (i.e., administrators, and professional and support staff), and Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties: include but are not limited to guests and/or visitors on District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with or seeking to do business with the Board, and other individuals who come in contact with members of the District community at school-related events/activities (whether on or off District property).

An individual with a disability means a person who has, **has had** a record of, or is regarded as having, a physical or mental impairment that substantially limits one or more major life activities.

Major Life Activities

Major life activities are functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, eating, sleeping, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, sitting, reaching, interacting with others, and working. 142

Major life activities also include the operation of a major bodily function, including, but not limited to, functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, hemic, lymphatic, musculoskeletal and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

Impairment That Substantially Limits a Major Life Activity

~~An impairment that is episodic in nature or in remission is considered a disability if it would substantially limit a major life activity when active.~~

The determination of whether an impairment substantially limits a major life activity must be made without regard to the ameliorative effects of mitigating measures such as medication, medical supplies, equipment or appliances, low-vision devices (defined as devices that magnify, enhance, or otherwise augment a visual image, but not including ordinary eyeglasses or contact lenses), prosthetics (including limbs and devices), hearing aid(s) and cochlear implant(s) or other implantable hearing devices, mobility devices, oxygen therapy equipment or supplies, use of assistive technology, reasonable accommodations or "auxiliary aids or services," learned behavioral or adaptive neurological modifications, psychotherapy, behavioral therapy, or physical therapy.

An impairment that is episodic in nature or in remission is considered a disability if it would substantially limit a major life activity when active.

Qualified Individual with a Disability

A qualified individual person with a disability means the individual satisfies the requisite skill, experience, education and other job-related requirements of the employment position the such individual holds or desires and ~~with or without reasonable accommodation,~~ can perform the essential functions of the job in question, with or without reasonable accommodation.

Reasonable Accommodation

The Board will provide a reasonable accommodation to a qualified individual who has an actual disability or who has a record of a disability unless the accommodation would impose an undue hardship on the operation of the Board District's program and/or activities. A reasonable accommodation is not ~~necessarily~~ required for an individual who is merely regarded as having a disability.

Facilities

No qualified person with a disability will be denied the benefits of, excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which Section 504/American with Disabilities Act (ADA) applies because the District's facilities are inaccessible to or unusable by persons with disabilities.

For facilities constructed or altered after June 3, 1977, the District will comply with applicable accessibility standards. For those existing facilities constructed prior to June 3, 1977, the District is committed to operating its programs and activities so that they are readily accessible to persons with disabilities.

District Compliance Officer(s)

The Board designates the following individual(s) to serve as the District's 504 CO(s)/ADA Coordinator(s) (hereinafter referred to as the "COs").

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets, Assistant Superintendent
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The name(s), title(s), and contact information of this/these individual(s) will be published annually on the School District's website.

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The COs are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding discrimination/retaliation or denial of equal access. The COs also shall verify that proper notice of nondiscrimination for Title II of the Americans with Disabilities Act (as amended), Title VI and Title VII of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 (as amended), and the Age Discrimination in Employment Act of 1975 is provided to staff members and the general public. A copy of each of the Acts and regulations on which this notice is based will be made available upon request from the CO. ~~Any sections of the and fulfill its responsibilities under Section 504 and Title II of the Americans with Disabilities Act, as amended ("ADA"). A copy of Section 504 and the ADA, including copies of their implementing regulations, may be obtained from the District COs.~~

The COs will oversee the investigation of any complaints of discrimination based on disability, which may be filed pursuant to the Board's adopted internal complaint procedure, and will attempt to resolve such complaints. Any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall assume the role of the CO for such complaints, as appropriate. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who shall coordinate with the other appointed/designated CO, or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO.

The Board will provide for the prompt and equitable resolution of complaints alleging violations of Section 504/ADA. (See Complaint Procedure below.)

Training

~~The COs will also oversee the training of employees in the District so that all employees understand their rights and responsibilities under Section 504 and the ADA, and are informed of the Board's policies, administrative guidelines, and practices with respect to fully implementing and complying with the requirements of Section 504/ADA.~~

~~The Board will provide in-service training and consultation to staff responsible for the education of persons with disabilities, as necessary and appropriate.~~

Facilities

~~No qualified person with a disability will, because the District's facilities are inaccessible to or unusable by persons with disabilities, be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any program or activity to which Section 504/ADA applies.~~

~~For facilities constructed or altered after June 3, 1977, the District will comply with applicable accessibility standards. For those existing facilities constructed prior to June 3, 1977, the District is committed to operating its programs and activities so that they are readily accessible to persons with disabilities.~~

Notice

~~Notice of the Board's policy on nondiscrimination in employment practices and the identity of the COs will be posted throughout the District, and published in the District's recruitment statements or general information publications.~~

Complaint Procedures

If a person believes that s/he has been discriminated against on the basis of his/her disability, the person may utilize the following complaint procedures as a means of reaching, at the lowest possible administrative level, a prompt and equitable resolution of the matter.

In accordance with Section 504 of the Rehabilitation Act of 1973 and its implementing regulations ("Section 504"), employees will be notified of their right to file an internal complaint regarding an alleged violation, misinterpretation, or misapplication of Section 504. In addition, employees will be notified of their right to file a complaint with the U.S. Department of Education's Office for Civil Rights.

Internal complaints must be put in writing and must identify the specific circumstances or areas of dispute that have given rise to the complaint, and offer possible solutions to the dispute. The complaint must be filed with COs within the time limits specified below. The COs are available to assist individuals in filing a complaint.

Internal Complaint Procedure

The following internal complaint procedure is available to employees for the prompt and equitable resolution of complaints alleging discrimination based upon disability. Use of the internal complaint procedure is not a prerequisite to the pursuit of other remedies,

including the filing of a complaint with the U.S. Department of Education's Office for Civil Rights.

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- A. An employee with a complaint based on alleged discrimination on the basis of disability may first discuss the problem with the CO.
- B. If the informal discussion does not resolve the matter, or if the employee skips Step A, the individual may file a formal written complaint with the CO. The written complaint must contain the name and address of the individual or representative filing the complaint, be signed by the Complainant or someone authorized to sign for the Complainant, describe the alleged discriminatory action in sufficient detail to inform the CO of the nature and date of the alleged violation and propose a resolution. The complaint must be filed within thirty (30) ~~calendar~~ days of the circumstances or event giving rise to the complaint unless the time for filing is extended by the CO for good cause.
- C. The CO will conduct an independent investigation of the matter (which may or may not include a hearing). This complaint procedure contemplates informal, but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to present witnesses and other evidence relevant to the complaint. The CO will provide the Complainant with a written disposition of the complaint within ten (10) ~~business~~ days. If no decision is rendered within ten (10) business days, or the decision is unsatisfactory in the opinion of the Complainant, the employee may file, in writing, an appeal with the Superintendent. The CO shall maintain the District's files and records relating to the complaint.
- D. The Superintendent will, within ten (10) ~~business~~ days of receiving the written appeal, conduct a hearing with all parties involved in an attempt to resolve the complaint.
- The Superintendent will render his/her decision within ten (10) ~~business~~ days of the hearing.
- E. The employee may be represented, at his/her own cost, at any of the above-described meetings/hearings.
- F. The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights or the filing of a court case. Use of this internal complaint procedure is not a prerequisite to the pursuit of other remedies.

If it is determined that the Complainant was subjected to ~~unlawful~~ discrimination, the CO must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the discrimination/retaliation. The corrective action should be reasonable, timely, effective, and tailored to the specific situation.

OCR Complaint

At any time, if an employee believes that s/he has been subjected to discrimination based upon his/her disability in violation of Section 504 or the ADA, the individual may file a complaint with the U.S. Department of Education's Office for Civil Rights ("OCR"). The OCR can be reached at:

U.S. Department of Education Office for Civil Rights Citigroup Center
500 W. Madison Street Suite 1475
Chicago, IL 60661
(312) 730-1560
FAX: (312) 730-1576
TDD: (877) 521-2172
E-mail: OCR.Chicago@ed.gov

Privacy/Confidentiality

The District will employ all reasonable efforts to protect the rights of the Complainant, the Respondent(s), and the witnesses as much as possible, consistent with the District's legal obligations to investigate, take appropriate action, and conform with any discovery or disclosure obligations.

All records generated under the terms of this policy shall be maintained as confidential to the extent permitted by law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided the Complainant's identity.

During the course of a formal investigation, the CO or designee will instruct each person who is interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of an investigation is expected not to disclose to third parties any information that is learned or provided during the course of the investigation.

Remedial Action and Monitoring

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to the discrimination or other appropriate action.

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The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against discrimination by taking appropriate action reasonably calculated to stop and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable State law and any relevant codes of conduct.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the age and maturity level of any student involved. In those cases where discrimination/retaliation is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior disciplinary action has been taken against the Respondent, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its recurrence, and remedy its effect.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging ~~unlawful~~ discrimination/retaliation, or participates as a witness in an investigation, is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce, Specifically, the Board will not discriminate/retaliate against, coerce, intimidate, threaten or interfere with any individual because the person opposed any act or practice made ~~unlawful~~ by Section 504 or the ADA, or because that individual made a report, formal complaint charge, testified, assisted or participated, or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of discriminatory practices. The Superintendent shall provide appropriate information to all members of the District community related to the implementation of this policy and shall provide training for District students and staff where appropriate. All training and information provided regarding the Board's policy and discrimination, in general, will be age and content-appropriate.

Retention of Investigatory Records and Materials

The CO is responsible for overseeing the retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include but are not limited to:

- A. all written reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy;
- B. any narratives that memorialize oral reports/allegations/complaints/grievances/statements/responses pertaining to an alleged violation of this policy;
- C. any documentation that memorializes the actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities related to the investigation and/or the District's response to the alleged violation of this

policy;

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- D. written witness statements;
- E. narratives, notes from, and audio, video, or digital recordings of witness interviews/statements;
- F. e-mails, texts, and social media posts that directly relate to or constitute evidence pertaining to an alleged violation of this policy (i.e., not after-the-fact commentary about or media coverage of the incident);
- G. notes and summaries prepared contemporaneously by the investigator in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.), but not including transitory notes whose content is otherwise memorialized in other documents;
- H. written disciplinary sanctions issued to students or employees and other documentation that memorializes oral disciplinary sanctions issued to students or employees for violations of this policy;
- I. dated written determinations/reports (including summaries of relevant exculpatory and inculpatory evidence) and other documentation that memorializes oral notifications to the parties concerning the outcome of the investigation, including any consequences imposed as a result of a violation of this policy;
- J. documentation of any supportive measures offered and/or provided to the Complainant and the Respondent, including no contact orders issued to both parties, the dates the no contact orders were issued, and the dates the parties acknowledged receipt of the no contact orders;
- K. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects;
- L. copies of the Board policy and procedures/guidelines used by the District to conduct the investigation and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Codes of Conduct and/or Employee Handbooks);
- M. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- N. documentation of any training provided to District personnel related to this policy including, but not limited to notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conduct an investigation of an alleged violation of this policy.
- O. ~~) documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms;(-~~
- P. ~~) copies of any notices sent to the Respondent of the allegations constituting a potential violation of this policy;(-~~
- Q. ~~) copies of any notices sent to the Complainant and the Respondent in advance of any interview or meeting;(-~~
- R. ~~) copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report and any written responses submitted by the Complainant or the Respondent.(-~~

The documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal (e.g., FERPA, ADA) and/or State law, such as student records and confidential medical records.

The documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years and longer if required by the District's records retention schedule.

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Legal	29 U.S.C. 794, Section 504 Rehabilitation Act of 1973, as amended	147
	42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended	
	29 C.F.R. Part 1630	
	34 C.F.R. Part 104	

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	EMPLOYEE ANTI-HARASSMENT
Code	po4362
Status	Second Reading
Adopted	May 25, 2016
Last Revised	November 17, 2021
Prior Revised Dates	10/21/2020

4362 - **EMPLOYEE ANTI-HARASSMENT**

Prohibited Harassment

The Board is committed to a work environment that is free of harassment of any form. The Board will not tolerate any form of harassment and will take all necessary and appropriate action to eliminate it. Any member of the School District community who violates this policy will be subject to disciplinary action, up to and including termination of employment. Additionally, appropriate action will be taken to stop and otherwise deal with any third party who engages in harassment against our employees.

The Board will vigorously enforce its prohibition against harassment based on race, color, national origin, age, sex (including transgender status, change of sex, sexual orientation, or gender identity), pregnancy, creed or religion, genetic information, handicap or disability, marital status, citizenship status, veteran status, military service (as defined in 111.32, Wis. Stats.), ancestry, arrest record, conviction record, use or non-use of lawful products off the District’s premises during non-working hours, declining to attend an employer-sponsored meeting or to participate in any communication with the employer about religious matters or political matters (~~collectively, "Protected Classes"~~), or any other characteristic protected by law in its employment practices (hereinafter referred to as ~~"harassment"~~ ~~"Protected Classes Characteristics"~~), and encourages those within the School District community as well as ~~T~~third ~~P~~parties, who feel aggrieved to seek assistance to rectify such problems. The Board prohibits harassment that affects tangible job benefits, interferes unreasonably with an individual’s work performance, or creates an intimidating, hostile, or offensive working environment. Harassment may occur employee-to-employee, employee-to-student, male-to-female, female-to-male, male-to-male, or female-to-female.

The Board will investigate all allegations of harassment and, in those cases where harassment is substantiated, ~~the Board will~~ take immediate steps ~~calculated~~ to end the harassment, prevent its reoccurrence, and, ~~if applicable,~~ remedy its effects.

Individuals who are found to have engaged in harassment will be subject to appropriate disciplinary action.

~~[] The District will offer counseling services to any person found to have been subjected to harassment and, where appropriate, the person(s) who committed the harassment.~~

~~For purposes of this policy, "School District community" means individuals subject to the control and supervision of the Board including, but not limited to, students, teachers, staff, volunteers, and Board members, agents, contractors, or other persons.~~

~~For purposes of this policy, "third parties" include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with the District, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off School District property).~~

Notice

Notice of the Board's policy on anti-harassment related to employment practices and the identity of the District's Compliance Officers will be posted throughout the District and published in any District statement regarding the availability of employment, staff handbooks, and general information publications of the District as required by Federal and State law and this policy.

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Definitions

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

Complainant: is the individual who alleges, or is alleged, to have been subjected to harassment, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged harassment.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Respondent: is the individual who has been alleged to have engaged in harassment, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged harassment.

School District community: means students and Board employees (i.e., administrators, and professional and support staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties: include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

Bullying

Bullying rises to the level of harassment when one or more persons systematically and chronically inflict physical hurt or psychological distress on one (1) or more students or employees and that bullying is based upon one (1) or more Protected Classes, that is, characteristics that are protected by Federal civil rights laws. It is defined as any unwanted and repeated written, verbal, or physical behavior, including any threatening, insulting, or dehumanizing gesture, by an adult or student, that is severe or pervasive enough to create an intimidating, hostile, or offensive educational or work environment; cause discomfort or humiliation; or unreasonably interfere with the individual's school or work performance or participation; and may involve:

- A. teasing;
- B. threats;
- C. intimidation;
- D. stalking;
- E. cyberstalking;
- F. cyberbullying;
- G. physical violence;
- H. theft;
- I. sexual, religious, or racial harassment;
- J. public humiliation; or
- K. destruction of property.

~~"Harassment" means any threatening, insulting, or dehumanizing gesture, use of data or computer software, or written, verbal or physical conduct directed against a school employee on the basis of the employee's Protected Classes Characteristics that:~~

- ~~A. places a school employee in reasonable fear of harm to his/her person or damage to his/her property;~~

B. ~~is sufficiently severe, pervasive, and persistent so as to create a hostile working environment which materially alters the employee's working conditions from the perspective of a reasonable person similarly situated;~~

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C. ~~has the effect of substantially disrupting the orderly operation of a school or any other aspect of the District's operations.~~

"Harassment" also includes "hate speech"—the use of language, behavior, or images/symbols that express prejudice against a particular group or groups on the basis of any protected characteristic(s).

Examples are:

A. making statements that promote violence toward a racial or ethnic group.

B. drawing, displaying, or posting images or symbols of prejudice (e.g., swastikas).

Sexual Harassment

For purposes of this policy and consistent with Pursuant to Title VII of the Civil Rights Act of 1964, ~~and Title IX of the Educational Amendments of 1972,~~ "sexual harassment" is defined as unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct based on sex constitutes sexual harassment when:

- A. a supervisory employee engages in harassing behavior towards a subordinate employee, regardless of whether such conduct creates a hostile work environment;
- B. acquiescence in or submission to such conduct is an explicit or implicit term or condition of employment;
- C. an individual's acquiescence in, submission to, or rejection of such conduct becomes the basis for employment decisions affecting that individual;
- D. such conduct is sufficiently severe, pervasive, and persistent such that it has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment;
- E. consensual sexual relationships where such relationship leads to favoritism of a subordinate employee with whom the superior is sexually involved and where such favoritism results in an adverse employment action for another employee or otherwise creates a hostile work environment;
- F. inappropriate boundary invasions by a District employee or other adult member of the District into a student's personal space and personal life.

Sexual harassment may involve the behavior of a person of any ~~either~~ gender against a person of the same or another ~~opposite~~ gender.

Sexual Harassment covered by Policy 2266/AG 2266 – Nondiscrimination on the Basis of Sex in Education Programs or Activities, i.e., sexual harassment prohibited by Title IX, is not included in this policy. Allegations of such conduct shall be addressed solely by Policy 2266/AG 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities.

Prohibited acts that constitute sexual harassment under this policy may take a variety of forms. Examples of the kinds of conduct that may constitute sexual harassment include, but are not limited to:

- A. unwelcome sexual propositions, invitations, solicitations, and flirtations;
- B. unwanted physical and/or sexual ~~contact~~ ~~assault~~;
- C. threats or insinuations that a person's employment, wages, promotion, assignments, or other conditions of employment may be adversely affected by not submitting to sexual advances;
- D. unwelcome verbal expressions ~~of a sexual nature~~, including graphic sexual commentaries about a person's body, dress, appearance, or sexual activities; the unwelcome use of sexually degrading language, profanity, jokes or innuendoes; unwelcome suggestive or insulting sounds or whistles; obscene telephone calls, text messages, or social media postings;

- E. sexually suggestive objects, pictures, graffiti, videos, videotapes, posters, audio recordings, or literature, placed in the work ~~of educational~~ environment that reasonably may embarrass or offend individuals; ~~remarks speculating about a person's sexual activities or sexual history, or remarks about one's own sexual activities or sexual history;~~
- F. unwelcome and inappropriate touching, patting, or pinching; obscene gestures;
- G. asking or telling about sexual fantasies, sexual preferences, or sexual activities;
- H. speculation about a person's sexual activities or sexual history or remarks about one's own sexual activities or sexual history;
- I. giving unwelcome personal gifts, such as lingerie, that suggest the desire for a romantic relationship;
- J. leering or staring at someone in a sexual way, such as staring at a person's breasts, buttocks, or groin;
- K. consensual sexual relationships where such relationship leads to favoritism of a subordinate employee with whom the superior is sexually involved and where such favoritism adversely affects other employees or otherwise creates a hostile work environment; ~~and~~
- L. inappropriate boundary invasions by a District employee or other adult member of the School District community into a student's personal space and personal life; and
- M. verbal, nonverbal or physical aggression, intimidation, or hostility based on sex or sex-stereotyping that does not involve conduct of a sexual nature.

Sexual relationships between staff members, where one staff member has supervisory responsibilities over the other, are discouraged as a matter of Board policy. Such relationships have an inherent possibility of being construed as sexual harassment because the consensual aspect of the relationship may be the result of implicit or explicit duress caused by uncertainty regarding the consequences of non-compliance.

Romantic or sexual relationships between District staff (teachers, aides, administrators, coaches or other school authorities) and a student is expressly prohibited. Any school staff member who engages in sexual conduct with a student may also be guilty of a crime and any information regarding such instances will be reported to law enforcement authorities.

Boundary Invasions

Boundary invasions may be appropriate or inappropriate. Appropriate boundary invasions make medical or educational sense. For example, a teacher or aide assisting a kindergartner after a toileting accident or a coach touching a student during wrestling or football can be appropriate. However, other behaviors might be going too far, are inappropriate and may be signs of sexual grooming. Inappropriate boundary invasions may include, but are not limited to the following:

- A. hugging, kissing, or other physical contact with a student;
- B. telling sexual jokes to students;
- C. engaging in talk containing sexual innuendo or banter with students;
- D. talking about sexual topics that are not related to curriculum;
- E. showing pornography to a student;
- F. taking an undue interest in a student (i.e. having a "special friend" or a "special relationship");
- G. initiating or extending contact with students beyond the school day for personal purposes;
- H. using e-mail, text messaging, or websites to discuss personal topics or interests with students;
- I. giving students rides in the staff member's personal vehicle or taking students on personal outings without administrative approval;
- J. invading a student's privacy (e.g. walking in on the student in the bathroom, locker-room, asking about bra sizes or previous sexual experiences);
- K. going to a student's home for non-educational purposes;

- L. inviting students to the staff member's home without proper chaperones (i.e. another staff member or parent of student);
- M. giving gifts or money to a student for no legitimate educational purpose;
- N. accepting gifts or money from a student for no legitimate educational purpose;
- O. being overly "touchy" with students;
- P. favoring certain students by inviting them to come to the classroom at non-class times;
- Q. getting a student out of class to visit with the staff member;
- R. providing advice to or counseling a student regarding a personal problem (i.e. problems related to sexual behavior, substance abuse, mental or physical health, and/or family relationships, etc.), unless properly licensed and authorized to do so;
- S. talking to a student about problems that would normally be discussed with adults (i.e. marital issues);
- T. being alone with a student behind closed doors without a legitimate educational purpose;
- U. telling a student "secrets" and having "secrets" with a student;
- V. other similar activities or behavior.

Inappropriate boundary invasions are prohibited and must be reported promptly to one of the District Compliance Officers, as designated in this policy, the Building Principal or the Superintendent.

Religious (Creed) Harassment

Prohibited religious harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's religion or creed and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's religious tradition, clothing, or surnames, and/or involves religious slurs.

National Origin/Ancestry Harassment

Prohibited national origin/ancestry harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's national origin or ancestry and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's national origin or ancestry, such as negative comments regarding customs, manner of speaking, language, surnames, or ethnic slurs.

Age Harassment

Prohibited age-based harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's age, being over age forty (40), and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment.

Race/Color Harassment

Prohibited race/color based harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's race and/or color and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's race or color, such as racial slurs, nicknames implying stereotypes, epithets, and/or negative references regarding racial customs.

Disability Harassment

Prohibited disability harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's disability, perceived disability, or record of disability, and when the conduct has the purpose or effect of interfering with the individual's work performance; or of creating an intimidating, hostile, or offensive working environment. Such harassment may occur where conduct is directed at the characteristics of a person's current or past disability ~~disabling condition~~ or a perceived condition, such as negative comments about speech patterns, movement, physical impairments or defects/appearances, or the like. Such harassment may further occur where conduct is directed at or pertains to a person's genetic information.

Anti-Harassment Compliance Officers

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The following individual(s) shall serve as the District's Anti-Harassment Compliance Officer(s) (hereinafter, "the Compliance Officer(s)" or "CO" "COs"):

Dr. Kimberly Hall
 Director of Human Resources
 1699 Schofield Ave., Suite 300 ~~6300 Alderson Street~~
 Schofield ~~Weston~~, WI 54476
 715-359-4221 ext. 1225
 khall@dce.K12.wi.us

Matt Spets Assistant Superintendent
 Business/Personnel Services
 1699 Schofield Ave., Suite 300 ~~6300 Alderson Street~~
 Schofield ~~Weston~~, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.K12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public and on the School District's website.

The Compliance Officer(s) are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding harassment.

Reports and Complaints of Harassing Conduct

The Compliance Officer(s) will be available during regular school/work hours to discuss concerns related to harassment, to assist students, other members of the District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct, or to intercede informally on behalf of the individual in those instances where concerns have not resulted in the filing of a formal complaint and where all parties are in agreement to participate in an informal process.

Compliance Officers shall accept reports of harassment directly from any member of the School District community or a Third Party or receive reports that are initially filed with an administrator, supervisor, or other District-level official. Upon receipt of a report of alleged harassment, the Compliance Officer(s) will contact the Complainant and begin either an informal or formal complaint process (depending on the request of the Complainant or the nature of the alleged harassment), or [] Option 1 the CO(s) will designate a specific individual to conduct such a process as identified in a pre-defined list of investigators. [END OF OPTION 1] [] Option 2 the Superintendent will designate a specific individual to conduct the process necessary for an informal or formal investigation. [END OF OPTION 2] The Compliance Officer(s) will provide a copy of this policy to the Complainant and Respondent. In the case of a formal complaint, the Compliance Officer(s) will prepare recommendations for the Superintendent or will oversee the preparation of such recommendations by a designee. All Board employees must report incidents of harassment that are reported to them to the Compliance Officer within two (2) days of learning of the incident.

Any Board employee who directly observes harassment is obligated, in accordance with this policy, to report such observations to the Compliance Officer(s) within two (2) days. Additionally, any Board employee who observes an act of harassment is expected to intervene to stop the harassment, unless circumstances make such an intervention dangerous, in which case the staff member should immediately notify other Board employees and/or local law enforcement officials, as necessary, to stop the harassment. Thereafter, the Compliance Officer(s) or designee must contact the Complainant, if age eighteen (18) or older, or Complainant's parents/guardians if the Complainant is under the age eighteen (18), within two (2) days to advise of the Board's intent to investigate the alleged wrongdoing.

Members of the School District community ~~and third parties, which includes all staff,~~ along with Third Parties are encouraged to promptly report incidents of harassing conduct to an administrator, supervisor or other District official so that the Board may address the conduct before it becomes severe, pervasive, or persistent. Any administrator, supervisor, or other District official who receives such a ~~report~~ complaint shall file it with the ~~District's~~ Compliance Officer within two (2) days of receiving the report of harassment ~~at his/her first opportunity.~~

Members of the School District community ~~and Third Parties~~ or third parties who believe they have been harassed by another member of the School District community or a ~~Third Party~~ third party are entitled to utilize the Board's complaint process that is set forth below. Initiating a complaint, whether formally or informally, will not adversely affect the ~~Complainant's~~ complaining individual's employment unless the complaining individual makes the complaint maliciously or with the knowledge that it is false.

Reporting procedures are as follows:

- A. Any employee who believes s/he has been the victim of harassment prohibited under this policy is encouraged to report~~154~~ alleged harassment to the appropriate school official as identified in D below.
- B. Teachers, administrators, and other District officials who have knowledge of or receive notice that an employee has or may have been the victim of harassment prohibited under this policy shall immediately report the alleged harassment to the appropriate school official as defined in D below.
- C. Any other person with knowledge or belief that an employee has or may have been the victim of harassment prohibited by this policy shall be encouraged to immediately report the alleged acts to an appropriate school official as identified in D below.
- D. Appropriate District officials are as follows:
1. Any complaint under this policy shall be reported to the District's Compliance Officer unless the complaint is regarding the Compliance Officer. In such cases, the complaints shall be reported to the Superintendent, who will coordinate with the other appointed/designated CO, or, if appropriate appoint/designate another individual to serve as CO for the complaint regarding a CO. for such complaints.
 2. Any complaint under this policy regarding the Superintendent or Board Member that is received by the District Compliance Officer shall be referred to the Board's legal counsel, who shall assume the role of the District Compliance Officer for such complaints.
- E. The reporting party or Complainant shall be encouraged to use a report form available from the Principal of each building or available from the District office, but oral reports shall be considered complaints as well. Use of formal reporting forms shall not be mandated. However, all oral complaints shall be reduced to writing. Further, nothing in this policy shall prevent any person from reporting harassment directly to the Superintendent or other supervisory employee.
- F. To provide individuals with options for reporting harassment to an individual of the gender with which they feel most comfortable, the District shall designate both a male and a female District Compliance Officer.

If during an investigation of alleged bullying, aggressive behavior, and/or harassment in accordance with Policy 5517.01 - Bullying, the Principal believes that the reported misconduct may have created a hostile work environment and may have constituted discriminatory harassment based on a Protected Class, the Principal shall report the act of bullying, aggressive behavior and/or harassment to the Compliance Officer(s) who shall investigate the allegation in accordance with this policy. If the alleged harassment involves Sexual Harassment as defined by Policy 2266, the matter will be investigated in accordance with the grievance process and procedures outlined in Policy 2266. While the Compliance Officer investigates the allegation, or the matter is being addressed pursuant to Policy 2266, the Principal shall suspend the Policy 5517.01 investigation to await the Compliance Officer's written report or the determination of responsibility pursuant to Policy 2266. The Compliance Officer shall keep the Principal informed of the status of the Policy 1662 investigation and provide the Principal with a copy of the resulting written report. Likewise, the Title IX Coordinator will provide the Principal with the determination of responsibility that results from the Policy 2266 grievance process.

~~A CO will be available during regular school/work hours to discuss concerns related to harassment, to assist students, other members of the School-District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct.~~

~~The COs are assigned to accept complaints of harassment directly from any member of the School-District community or a visitor to the District or to receive complaints that are initially filed with a school building administrator. Upon receipt of a complaint either directly or through a school building administrator, a CO will begin either an investigation or the CO will designate a specific individual to conduct such a process. The CO will prepare recommendations or will oversee the preparation of such recommendations. All members of the School District community should report incidents of harassment that are reported to them to the CO within two (2) business days of learning of the incident.~~

Investigation and Complaint Procedure

Except for Sexual Harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Program or Activities, aAny employee or other member of the School District community or Third Party (e.g., visitor to the District) who believes that they have/s/he has been subjected to harassment or has witnessed harassment of another may seek resolution of the his/her complaint through the procedures ~~as~~ described below. The complaint process involves an investigation of the Complainant's claims of harassment or retaliation and a process for rendering a decision regarding whether the charges are substantiated. Further, a process for investigating claims of harassment and a process for rendering a decision regarding whether the claim of harassment was substantiated are set forth below.

~~Once the complaint process begins, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) business days of the complaint being received).~~

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The procedures set forth below are not intended to interfere with the rights of any individual to pursue a complaint of harassment or retaliation with the United States Department of Education Office for Civil Rights ("OCR"), the Wisconsin Equal Rights Division, and/or Equal Employment Opportunity Commission ("EEOC"). The Chicago Office of the OCR can be reached at John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor, Chicago, IL 60604; Telephone: 312-730-1560; FAX: 312-730-1576; TDD: 800-877-8339; Email: OCR.Chicago@ed.gov; Web: http://www.ed.gov/ocr.

Complaint Procedure

~~A Complainant~~An individual who believes s/he has been subjected to harassment hereinafter referred to as the "Complainant," ~~who alleges harassment based on a protected class or retaliation~~ may file a complaint, either orally or in writing: 1) with a teacher, Principal; 2) directly to one of the COs; or 3) to the Superintendent; or other supervisory employee. As noted above, any complaint received regarding the Superintendent or a Board member shall be referred to the Board's legal counsel, who shall assume the role of the CO for such complaints. Additionally, if the complaint is regarding a CO, the complaint shall be reported to the Superintendent, who ~~may will consult, in consultation~~ with the other appointed/designated CO, if any, and if necessary appoint/designate another individual to serve in the role of CO ~~assume the role of the CO~~ for such a complaint regarding a CO.

Due to the sensitivity surrounding complaints of harassment and retaliation, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a complaint within thirty (30) ~~calendar~~ days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a Principal, Superintendent, or other supervisory employee, either orally or in writing, about any complaint of discrimination or retaliation, that employee must report such information to the CO within two (2) ~~business~~ days.

Throughout the course of the process as described herein, the CO should keep the parties reasonably informed of the status of the investigation and the decision-making process.

All written complaints must include the following information to the extent known it is available: the identity of the Respondent individual believed to have engaged in, or be actively engaging in, harassment; a detailed description of the facts upon which the complaint is based (i.e., when, where, and what occurred); and a list of potential witnesses; and the resolution sought by the Complainant.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the CO shall ask for such details in an oral interview. Thereafter the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken in the investigatory phase to protect the Complainant from further harassment or retaliation including but not limited to a change of work assignment or schedule for the Complainant and/or the Respondent alleged harasser. In making such a determination, the CO should consult the Complainant to assess whether the individual agrees with his/her position to the proposed action. If the Complainant is unwilling to consent to the proposed change, the CO may still take whatever actions deemed s/he deems appropriate in consultation with the Superintendent. No temporary arrangements shall be disciplinary to either the Complainant or Respondent.

Within two (2) ~~business~~ days of receiving a complaint, the CO will inform the Respondent individual alleged to have engaged in the harassing or retaliatory conduct, hereinafter referred to as the "Respondent", that a complaint has been received.

The Respondent is not entitled to receive a copy of any written complaint unless the CO determines it is appropriate to do so; however, the Respondent will be informed about the nature of the allegations. The CO shall inform the Respondent of the requirements of this policy, which may include providing the Respondent with a copy of this policy or information about where to find it. Respondent shall be afforded the opportunity to submit a written response to the complaint. The CO shall inform the Respondent of the Respondent's deadline to provide the CO with the written response to the allegations in the complaint.

Within five (5) days of receiving the complaint, the CO will initiate an investigation by at a minimum confirming receipt of the complaint with the Complainant and informing the Complainant of the investigation process.

Investigations shall be completed promptly. What constitutes promptness will depend on the complexity of the issues, the number of incidents or factual elements, the number of witnesses and documents to be consulted, and the availability of witnesses and other evidence. The CO shall keep the Complainant reasonably informed of the investigation's progress. [END-OF-OPTIONS]

~~Within five (5) business days of receiving the complaint, the CO will initiate a formal investigation to determine whether the Complainant has been subject to offensive conduct/harassment.~~

~~Although certain cases may require additional time, the CO will attempt to complete an investigation into the allegations of harassment within fifteen (15) calendar days of receiving the formal complaint.~~The investigation will include:

- A. interview(s) with the Complainant;
- B. interview(s) with the Respondent;
- C. interviews with any other witnesses who ~~may~~ reasonably may be expected to have any information relevant to the allegations, as determined by the CO;
- D. consideration of any documentation or other evidence presented by the Complainant, Respondent, or any other witness which is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO or designee shall prepare and deliver a written report to the Superintendent that summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definition of harassment as provided in this policy and State and Federal law as to whether the Respondent engaged in harassment of or retaliation toward the Complainant ~~Complainant has been subjected to harassment~~. The CO's recommendations must be based upon the totality of the circumstances, including the ages and maturity levels of those involved. In determining if discriminatory harassment or retaliation occurred, a preponderance of evidence standard will be used.

The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.

In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation, the CO may in consultation with the Superintendent or Board President, if the matter involves the Superintendent engage outside legal counsel to conduct the investigation consistent with this policy.

Absent extenuating circumstances, within five (5) ~~business~~ days of receiving the report of the CO, the Superintendent must either issue a written final decision regarding whether or not the complaint of harassment has been substantiated or request further investigation. A copy of the Superintendent's final decision will be delivered to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within five (5) ~~business~~ days. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above.

If the Superintendent determines the Respondent engaged in harassment of or retaliation toward the Complainant, the Superintendent must identify what corrective action will be taken to stop, remedy, and prevent the recurrence of the harassment or retaliation. The corrective action should be reasonable, timely, age-appropriate, effective, and tailored to the specific situation.

The decision of the Superintendent shall be final. If the investigation results in disciplinary action, the employee subject to discipline is entitled to file a grievance pursuant to Board Policy 3340. Nothing in this policy shall be construed to prevent an employee from bringing a complaint before the Equal Employment Opportunity Commission or the Wisconsin Equal Rights Division.

The Board reserves the right to investigate and resolve a complaint or report of harassment regardless of whether the member of the School District community or ~~Third Party~~ alleging the harassment pursues the complaint. The Board also reserves the right to have the formal complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board.

The parties may be represented, at their own cost, at any of the above-described meetings/hearings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint procedure is not a prerequisite to the pursuit of other remedies.

All timelines pertinent to the investigation process are intended to be guidelines to assure that the investigation proceeds with all deliberate efficiency. Failure of the CO to meet any specific timeline does not invalidate the investigation or provide a defense to the allegations.

Privacy/Confidentiality

The ~~School~~ District will employ reasonable efforts to protect the rights of the Complainant, the Respondent(s), and all the witnesses as much as possible, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery or disclosure obligation in an investigation of harassment. The School District will respect the privacy of the Complainant, the Respondent, and all witnesses in a manner consistent with the School District's legal obligations under State and Federal law. Confidentiality, however, cannot be guaranteed. Additionally, the Respondent must be provided with the Complainant's

~~identity. All Complainants proceeding through the formal investigation process should be advised that their identities may be disclosed to the respondent.~~

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During the course of an investigation, the CO will determine whether confidentiality during the investigation process is necessary to protect the interests and reputations of those involved and/or to protect the integrity of the investigation and if so, shall instruct all members of the School District community and third parties who are interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of a harassment investigation is expected not to disclose any information that is learned or provided s/he learns or that s/he provides during the course of the investigation.

Directives During Investigation

The CO may recommend to the Superintendent placing any employee involved in an investigation under this Policy on administrative leave pending resolution of the matter. If the Superintendent is the Respondent, the CO shall make such recommendation to the Board. Administrative leave may be appropriate in situations in which protecting the safety of any individual or the integrity of the investigation necessitates such action.

The CO shall determine whether any witnesses in the course of an investigation should be provided a *Garrity* warning apprising the person of his/her obligations to answer questions truthfully and honestly while preserving the right against self-incrimination in the context of any resulting criminal investigation or prosecution.

Every employee interviewed in the course of an investigation is required to provide truthful responses to all questions. Failure to do so may result in disciplinary action.

Remedial Action Sanctions and Monitoring

~~The Board shall vigorously enforce its prohibitions against harassment by taking appropriate action reasonably calculated to stop the harassment and prevent further such harassment.~~

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken due to because of the discrimination, or other appropriate action.

The Board may appoint an individual, who may be an employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against harassment/retaliation by taking appropriate action reasonably calculated to stop the harassment and prevent further misconduct.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee. All disciplinary action will be taken in accordance with applicable law.

When imposing discipline, the Superintendent shall consider the totality of the circumstances. In those cases where harassment is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior disciplinary action has been taken against the Respondent, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its reoccurrence, and remedy its effects.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging harassment/retaliation or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made by any Federal or State civil rights law, or because that individual made a report, formal complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Allegations Constituting Criminal Conduct

If the CO has reason to believe that the Complainant has been the victim of criminal conduct, such knowledge should be reported to local law enforcement. After such report has been made, the Superintendent shall be advised that local law enforcement was notified.

If the Complainant has been the victim of criminal conduct and the accused is the Superintendent, such knowledge should be reported by the CO to local law enforcement. After such report has been made, the Board Attorney shall be advised that local law enforcement was notified.

Any reports made to local law enforcement shall not terminate the COs obligation and responsibility to continue to investigate a complaint of harassment. While the COs may work cooperatively with outside agencies to conduct concurrent investigations, the harassment investigation shall not be stopped due to the involvement of outside agencies without good cause after consultation with the Superintendent.

Reprisal

Submission of a good faith complaint or report of harassment will not affect the Complainant's or reporter's work status or work environment. However, the Board also recognizes that false or fraudulent claims of harassment or false or fraudulent information about such claims may be filed. The Board reserves the right to discipline any person filing a false or fraudulent claim of harassment or false or fraudulent information about such a claim.

The District will discipline or take appropriate action against any member of the School District community who retaliates against any person who reports an incident of harassment prohibited by this policy or participates in a proceeding, investigation, or hearing relating to such harassment. Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment.

Miscellaneous

The District shall conspicuously post a notice including this policy against harassment in each school in a place accessible to the School District community and members of the public. This notice shall also include the name, mailing address, and telephone number of the COs, the name, mailing address, and telephone number of the State agency responsible for investigating allegations of discrimination in educational employment, and the mailing address and telephone number of the United States Equal Opportunity Employment Commission.

A link to this policy and any related administrative guidelines shall appear in the employee handbook and a copy shall be made available upon request of employees and other interested parties.

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of harassment. The Superintendent shall provide appropriate information to all members of the School District community related to the implementation of this policy and shall provide training for District staff at such times as the Board in consultation with the Superintendent determines is necessary or appropriate.

The Board will respect the privacy of the Complainant, the individuals against whom the complaint is filed, and the witnesses as much as practicable, consistent with the Board's legal obligations to investigate, to take appropriate action, and to conform with any discovery, disclosure, or other legal obligations.

Retention of Investigatory Records and Materials

The CO(s) is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all ~~information,~~ documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and/or received as part of an investigation, which may include ~~including,~~ but are not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;

- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;
- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
- F. all documentary evidence;
- G. e-mails, texts, or social media posts pertaining to the investigation;
- H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
- I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;
- J. dated written determinations to the parties;
- K. dated written descriptions of verbal notifications to the parties;
- L. written documentation of any supportive interim measures offered and/or provided to Complainant and/or the Respondent/Complainants, including no contact orders issued to both parties, the dates issued, and the dates the parties acknowledged receipt; and
- M. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects.
- N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Code of Conduct and/or Employee Handbooks);
- O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy;.
- Q. ~~documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms;(-)~~
- R. ~~copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy;(-)~~
- S. ~~copies of any notices sent to the Complainant and the Respondent in advance of any interview, meeting, or hearing;(-)~~
- T. ~~copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.(-)~~

The information, documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The information, documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, and Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

~~Revised 4/24/19~~

~~T.C. 6/22/20~~

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Legal

111.31, 118.195, 118.20, Wis. Stats.
29 U.S.C. 621 et seq., Age Discrimination in Employment Act of 1967
29 U.S.C. 794, Rehabilitation Act of 1973
42 U.S.C. 1983
42 U.S.C. 2000d et seq., Title VI of the Civil Rights Act of 1964
42 U.S.C. 2000e et seq., Title VII of the Civil Rights Act of 1964
42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act
42 U.S.C. 6101 et seq., Age Discrimination Act of 1975
42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended
29 C.F.R. Part 1635
National School Boards Association Inquiry and Analysis - May 2008

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Cross References

[4362F - Discrimination/Harassment Complaint Form](#)

Last Modified by Ellen Suckow on October 29, 2021



Book	Policy Manual
Section	Second Reading by Board
Title	STUDENT ANTI-HARASSMENT
Code	po5517
Status	Second Reading
Adopted	May 25, 2016
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5517 - STUDENT ANTI-HARASSMENT

Prohibited Harassment

It is the policy of the Board to maintain an educational environment that is free from all forms of harassment, ~~including sexual harassment~~. This commitment applies to all District operations, programs, and activities. All students, administrators, teachers, staff, and all other school personnel share responsibility for avoiding, discouraging, and reporting any form of harassment. This policy applies to conduct occurring in any manner or setting over which the Board can exercise control, including on school property, or at another location if such conduct occurs during an activity sponsored by the Board.

The Board will not tolerate any form of harassment and will take all necessary and appropriate actions to eliminate it, including suspension or expulsion of students and disciplinary action against any other individual in the School District community. Additionally, appropriate action will be taken to stop and otherwise deal with any third party who engages in harassment against our students.

The Board will vigorously enforce its prohibition against harassment based on the traits of sex (including ~~trans~~gender status, change of sex, or gender identity), race, color, national origin, religion, creed, ancestry, marital or parental status, sexual orientation or physical, mental, emotional or learning disability, or any other characteristic protected by Federal or State civil rights laws (hereinafter referred to as "Protected Classes"), and encourages those within the School District community as well as ~~I~~third ~~P~~parties, who feel aggrieved to seek assistance to rectify such problems. Additionally, the Board prohibits harassing behavior directed at students for any reason, even if not based on one of the Protected Classes, through its policies on bullying (See Policy 5517.01 – Bullying).

~~[] The District will offer counseling services to any person found to have been subjected to harassment and, where appropriate, the person(s) who committed the harassment.~~

Harassment may occur student-to-student, student-to-staff, staff-to-student, male-to-female, female-to-male, male-to-male, or female-to-female. The Board will investigate all allegations of harassment and in those cases where harassment is substantiated, the Board will take immediate steps designed to end the harassment, prevent its reoccurrence, and remedy its effects. Individuals who are found to have engaged in harassment will be subject to appropriate disciplinary action.

~~For purposes of this policy, "School District community" means individuals students, administrators, teachers, staff, and as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.~~

~~For purposes of this policy, "third parties" include, but are not limited to, guests and/or visitors on District property (e.g., visiting speakers, participants on opposing athletic teams parent), vendors doing business with, or seeking to do business with the Board, and other individuals who come in contact with members of the School District community at school related events/activities (whether on or off District property).~~

Other Violations of the Anti-Harassment Policy

The Board will also take immediate steps to impose disciplinary action on individuals engaging in any of the following prohibited acts:

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- A. Retaliating against a person who has made a report or filed a complaint alleging harassment, or who has participated as a witness in a harassment investigation;
- B. Filing a malicious or knowingly false report or complaint of harassment;
- C. Disregarding, failing to investigate adequately, or delaying investigation of allegations of harassment, when responsibility for reporting and/or investigating harassment charges comprises part of one's **supervisory** duties

Sexual Harassment covered by Policy 2266/AG 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities, i.e., sexual harassment prohibited by Title IX, is not included in this policy. Allegations of such conduct shall be addressed solely by Policy 2266/AG 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities.

Notice

Notice of the Board's policy on anti-harassment in the educational environment and the identity of the District's Compliance Officers will be posted throughout the District and published in any District statement regarding the availability of employment, staff handbooks, and general information publications of the District as required by Federal and State law and this policy.

Definitions

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

Complainant is the individual who alleges, or is alleged, to have been subjected to harassment, regardless of whether the person files a formal complaint or is pursuing an informal resolution to the alleged harassment.

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 District office is open for normal operating hours, Monday – Friday, excluding State-recognized holidays).

Respondent is the individual who has been alleged to have engaged in harassment, regardless of whether the Reporting Party files a formal complaint or is seeking an informal resolution to the alleged harassment.

School District community means students and Board employees (i.e., administrators, and professional and classified staff), as well as Board members, agents, volunteers, contractors, or other persons subject to the control and supervision of the Board.

Third Parties include, but are not limited to, guests and/or visitors on School District property (e.g., visiting speakers, participants on opposing athletic teams, parents), vendors doing business with, or seeking to do business with, the Board, and other individuals who come in contact with members of the School District community at school-related events/activities (whether on or off District property).

Bullying

Bullying is prohibited by Board Policy 5517.01 – Bullying. It is defined as deliberate or intentional behavior using words or actions, intended to cause fear, intimidation, or harm. Bullying may be a repeated behavior and involves an imbalance of power. Furthermore, it may be serious enough to negatively impact a student's educational, physical, or emotional well-being. Bullying need not be based on any Protected Class. Bullying behavior rises to the level of harassment when the prohibited conduct is based upon the student's sex (including **trans**gender status, change of sex, or gender identity), race color, national origin, religion, creed, ancestry, marital or parental status, sexual orientation or physical, mental, emotional or learning disability, or any other characteristic protected by Federal or State civil rights. Complaints brought under this policy that are more appropriately handled under the Bullying policy shall be referred for investigation consistent with the procedures in that policy.

Bullying that rises to the level of Sexual Harassment is covered by Policy 2266/AG 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities, i.e., sexual harassment prohibited by Title IX, and is not included in this policy. Allegations of such conduct shall be addressed solely by Policy 2266/AG 2266 - Nondiscrimination on the Basis of Sex in Education Programs or Activities.

Harassment

Harassment means any threatening, insulting, or dehumanizing gesture, use of data or computer software, or written, verbal or physical conduct directed against a student based on one or more of the student's Protected Class that:

- A. places a student in reasonable fear of harm to his/her person or damage to his/her property;
- B. has the effect of substantially interfering with a student's educational performance, opportunities, or benefits; or
- C. has the effect of substantially disrupting the orderly operation of a school.

"Harassment" also includes "hate speech"—the use of language, behavior, or images/symbols that express prejudice against a particular group or groups on the basis of any protected characteristic(s).

Examples are:

- A. making statements that promote violence toward a racial or ethnic group;
- B. drawing, displaying, or posting images or symbols of prejudice (e.g., swastikas).

Sexual Harassment

For purposes of this policy and consistent with Title VII of the Civil Rights Act of 1964, "Sexual harassment" is defined as unwelcome sexual advances, requests for sexual favors, sexually motivated physical conduct or other verbal or physical conduct or communication of a sexual nature when:

- A. submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of access to educational opportunities or program;
- B. submission or rejection of that conduct or communication by an individual is used as a factor in decisions affecting that individual's education;
- C. that conduct or communication has the purpose or effect of substantially or unreasonably interfering with an individual's education, or creating an intimidating, hostile, or offensive educational environment.

Sexual harassment may involve the behavior of a person of any either gender against a person of the same or another opposite gender.

Prohibited acts that constitute sexual harassment under this policy may take a variety of forms. Examples of the kinds of conduct that may constitute sexual harassment include, but are not limited to:

- A. unwelcome verbal harassment or abuse;
- B. unwelcome pressure for sexual activity;
- C. threats or insinuations that a person's employment, wages, academic grade, promotion, classroom work or assignments, academic status, participation in athletics or extra-curricular programs, activities, or events, or other conditions of employment or education may be adversely affected by not submitting to sexual advances;
- D. unwelcome verbal expressions, including graphic sexual commentaries about a person's body, dress, appearance, or sexual activities; the unwelcome use of sexually degrading language, profanity, jokes or innuendoes; unwelcome suggestive or insulting sounds or whistles; obscene telephone calls and obscene gestures;
- E. Sexually suggestive objects, pictures, graffiti, videos, posters, audio recordings or literature, placed in the work or educational environment, that may reasonably embarrass or offend individuals;
- F. unwelcome, sexually motivated or inappropriate patting, pinching, or physical contact, other than necessary restraint of students by teachers, administrators, or other school personnel to avoid physical harm to persons or property;
- G. unwelcome sexual behavior or words including demands for sexual favors, accompanied by implied or overt threats concerning an individual's educational status;
- H. unwelcome sexual behavior or words, including demands for sexual favors, accompanied by implied or overt promises of preferential treatment with regard to an individual's educational status;

I. unwelcome behavior or words directed at an individual because of gender;

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Examples are:

1. repeatedly asking a person for dates or sexual behavior after the person has indicated no interest;
2. rating a person's sexuality or attractiveness;
3. staring or leering at various parts of another person's body;
4. spreading rumors about a person's sexuality;
5. letters, notes, telephone calls, or materials of a sexual nature;
6. displaying pictures, calendars, cartoons, or other materials with sexual content.

J. inappropriate boundary invasions by a District employee or other adult member of the District community into a student's personal space and personal life.

Boundary invasions may be appropriate or inappropriate. Appropriate boundary invasions make medical or educational sense. For example, a teacher or aide assisting a kindergartner after a toileting accident or a coach touching a student during wrestling or football can be appropriate. However other behaviors might be going too far, are inappropriate and may be signs of sexual grooming.

Inappropriate boundary invasions may include, but are not limited to the following:

1. hugging, kissing, or other physical contacts with a student;
2. telling sexual jokes to students;
3. engaging in talk containing sexual innuendo or banter with students;
4. talking about sexual topics that are not related to the curriculum;
5. showing pornography to a student;
6. taking an undue interest in a student (i.e. having a "special friend" or a "special relationship");
7. initiating or extending contact with students beyond the school day for personal purposes;
8. using e-mail, text messaging or websites to discuss personal topics or interests with students;
9. giving students rides in the staff member's personal vehicle or taking students on personal outings without administrative approval;
10. invading a student's privacy (e.g. walking in on the student in the bathroom, locker-room, asking about bra sizes or previous sexual experiences);
11. going to a student's home for non-educational purposes;
12. inviting students to the staff member's home without proper chaperones (i.e. another staff member or parent of a student);
13. giving gifts or money to a student for no legitimate educational purpose;
14. accepting gifts or money from a student for no legitimate educational purpose;
15. being overly "touchy" with students;
16. favoring certain students by inviting them to come to the classroom at non-class times;

17. getting a student out of class to visit with the staff member;
18. providing advice to or counseling a student regarding a personal problem (i.e. problems related to sexual behavior, substance abuse, mental or physical health, and/or family relationships, etc.), unless properly licensed and authorized to do so; 165
19. talking to a student about problems that would normally be discussed with adults (i.e. marital issues);
20. being alone with a student behind closed doors without a legitimate educational purpose;
21. telling a student "secrets" and having "secrets" with a student;
22. other similar activities or behavior.

Inappropriate boundary invasions are prohibited and must be reported promptly to one of the District Compliance Officers, as designated in this policy, the Building Principal or the Superintendent.

- H. ~~(X) a pattern of conduct, which can be subtle in nature, that has sexual overtones and is intended to create or has the effect of creating discomfort and/or humiliation to another;~~
- I. ~~remarks speculating about a person's sexual activities or sexual history, or remarks about one's own sexual activities or sexual history; and~~
- J. verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex-stereotyping that does not involve conduct of a sexual nature.

It is further the policy of the Board that a sexual relationship between staff and students is not permissible in any form or under any circumstances, in or out of the workplace, in that it interferes with the educational process and may involve elements of coercion by reason of the relative status of a staff member to a student.

Not all behavior with sexual connotations constitutes sexual harassment. Sex-based or gender-based conduct must be sufficiently severe, pervasive, and persistent such that it adversely affects, limits, or denies an individual's education, or such that it creates a hostile or abusive educational environment, or such that it is intended to, or has the effect of, denying or limiting a student's ability to participate in or benefit from the educational program or activities.

Race/Color Harassment

Prohibited racial harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's race or color and when the conduct has the purpose or effect of: interfering with the individual's educational performance; creating an intimidating, hostile, or offensive learning environment; or interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's race or color, such as racial slurs, nicknames implying stereotypes, epithets, and/or negative references regarding relative to racial customs.

Religious (Creed) Harassment

Prohibited religious harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's religion or creed and when the conduct has the purpose or effect of: interfering with the individual's work or educational performance; creating an intimidating, hostile, or offensive learning environment; or interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's religious tradition, clothing, or surnames, and/or involves religious slurs.

National Origin/Ancestry Harassment

Prohibited national origin/ancestry harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's national origin or ancestry and when the conduct has the purpose or effect of: interfering with the individual's educational performance; creating an intimidating, hostile, or offensive working and/or learning environment; or interfering with one's ability to participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's national origin or ancestry, such as negative comments regarding customs, manner of speaking, language, surnames, or ethnic slurs.

Disability Harassment

Prohibited disability harassment occurs when unwelcome physical, verbal, or nonverbal conduct is based upon an individual's physical, mental, emotional or learning disability and when the conduct has the purpose or effect of: interfering with the individual's educational performance; creating an intimidating, hostile, or offensive learning environment; or interfering with one's ability to

participate in or benefit from a class or an educational program or activity. Such harassment may occur where conduct is directed at the characteristics of a person's disability~~disabling condition~~, such as negative comments about speech patterns, movement, physical impairments or defects/appearances, or the like.

Anti-Harassment Compliance Officers

The Board designates the following individuals to serve as the District's Compliance Officers (also known as "Anti-Harassment Compliance Officers"; hereinafter referred to as the "COs").

Employee Issues:

Dr. Kimberly Hall
 Director of Human Resources
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
715-359-4221, ext. 1225
 khall@dce.k12.wi.us

Matt Spets, Assistant Superintendent
 Business/Personnel Services
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 ext. 1243
 mspets@dce.k12.wi.us

Student Issues:

Dr. Casey Nye
 Assistant Superintendent of Learning
 D.C. Everest Area School District
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 Ext. 1327
cnyemjlechner@dce.k12.wi.us

Dr. Jeff Lindell
 Student Services Director
 D.C. Everest Area School District
1699 Schofield Ave., Suite 300~~6300 Alderson Street~~
Schofield~~Weston~~, WI 54476
 715-359-4221 Ext. 1351
 jlindell@dce.k12.wi.us

The names, titles, and contact information of these individuals will be published annually in the School District Annual Report to the public and on the School District's website.

The Compliance Officer(s) are responsible for coordinating the District's efforts to comply with applicable Federal and State laws and regulations, including the District's duty to address in a prompt and equitable manner any inquiries or complaints regarding harassment.

Reports and Complaints of Harassing Conduct~~Reporting Procedures~~

~~Students and all other members of the School District community, as well as third parties, are encouraged to promptly report incidents of harassing conduct to a teacher, administrator, supervisor, or District employee or official so that the Board may address the conduct before it becomes severe, pervasive, or persistent. Any teacher, administrator, supervisor, or other District employee or official who receives such a complaint shall file it with the District's Anti-Harassment Compliance Officer at his/her first opportunity.~~

~~Students who believe they have been subjected to harassment are entitled to utilize the Board's complaint process that is set forth below. Initiating a complaint will not adversely affect the complaining individual's participation in educational or extra-curricular programs unless the complaining individual makes the complaint maliciously or with the knowledge that it is false.~~

~~If, during an investigation of a reported act of bullying in accordance with Policy 5517.01—Bullying, the principal determines that the reported misconduct may have created a hostile learning environment and may have constituted harassment based on sex (including transgender status, change of sex, or gender identity), race, color, national origin, religion, creed, ancestry, marital or parental status, sexual orientation or physical, mental, emotional or learning disability, or any other characteristic protected by~~

~~Federal or State civil rights laws, the principal will report the act of bullying to one of the Compliance Officers who shall assume responsibility to investigate the allegation in accordance with this policy.~~

Reporting procedures are as follows:

- A. Any student who believes s/he has been the victim of harassment prohibited under this policy will be encouraged to report the alleged harassment to any District employee, such as a teacher, administrator or other employees.
- B. Any parent of a student who believes the student has been the victim of harassment prohibited under this policy is encouraged to report the alleged harassment to the student's teacher, building administrator or Superintendent.
- C. Teachers, administrators, and other school officials who have the knowledge or received notice that a student has or may have been the victim of harassment prohibited under this policy shall immediately report the alleged harassment to the Compliance Officer.
- D. Any other person with knowledge or belief that a student has or may have been the victim of harassment prohibited by this policy shall be encouraged to immediately report the alleged acts to any District employee, such as a teacher, administrator or other employees.
- E. The reporting party or Complainant shall be encouraged to use a report form available from the principal of each building or available from the District office, but oral reports shall be considered complaints as well. Use of formal reporting forms shall not be mandated. However, all oral complaints shall be reduced to writing. (5517F)
- F. To provide individuals with options for reporting harassment to an individual of the gender with which they feel most comfortable, each school's building principal shall be advised to designate both a male and a female Compliance Officer for receiving reports of harassment prohibited by this policy. At least one (1) Compliance Officer or other individuals shall be available outside regular school hours to address complaints of harassment that may require immediate attention.

A CO will be available during regular school/work hours to discuss concerns related to harassment, to assist students, other members of the School District community, and third parties who seek support or advice when informing another individual about "unwelcome" conduct, or to intercede informally on behalf of the student.

Any Board employee who directly observes harassment of a student is obligated, in accordance with this policy, to report such observations to one of the COs within two (2) ~~business~~ days. Thereafter, the COs must contact the Complainant student, if over age eighteen (18) or the Complainant's student's parents/guardians if under the age eighteen (18), within two (2) ~~business~~ days to advise s/he/them of the Board's intent to investigate the alleged misconduct, including the obligation of the compliance officer to conduct an investigation following all the procedures outlined in the complaint procedures.

The COs are assigned to accept complaints of harassment directly from any member of the School District community or a Third Party visitor to the District, or to receive complaints that are initially filed with a school building administrator. Upon receipt of a complaint, either directly or through a school building administrator, ~~a CO will contact the Complainant and begin either an informal or formal process (depending on the request of the Complainant or the nature of the alleged harassment), review and investigation or [] Option 1~~ the CO(s) will designate a specific individual to conduct such a process as identified in a pre-defined list of investigators. ~~[END OF OPTION 1] [] Option 2 the Superintendent will designate a specific individual to conduct the process necessary for an informal or formal investigation. [END OF OPTION 2] or the CO will designate a specific individual to conduct such a process.~~ The Compliance Officer(s) will provide a copy of this policy to the Complainant and Respondent. The CO will prepare recommendations for the Superintendent or will oversee the preparation of such recommendations by a designee. All Board employees ~~members of the School District community~~ must report incidents of harassment that are reported to them to the Compliance Officer as soon as possible, but always within no more than two (2) ~~calendar~~ days of learning of the incident.

Investigation and Complaint Procedure

Except for Sexual Harassment that is covered by Policy 2266 - Nondiscrimination on the Basis of Sex in Education Program or Activities, a Any student who believes that they have s/he has been subjected to harassment may seek resolution of the his/her complaint through the procedures described below. The formal complaint process involves an investigation of the Complainant's claims of harassment or retaliation and a process for rendering a decision regarding whether the charges are substantiated. Further, a process for investigating claims of harassment and a process for rendering a decision regarding whether the claim of harassment was substantiated are set forth below.

Due to the sensitivity surrounding complaints of harassment, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a complaint within thirty (30) days after the conduct occurs while the facts are known and potential witnesses are available. Once the complaint process is begun, the investigation will be completed in a timely manner (ordinarily, within fifteen (15) calendar days of the complaint being received).

The procedures set forth below are not intended to interfere with the rights of a student to pursue a complaint of harassment or retaliation with the United States Department of Education Office for Civil Rights ("OCR") and/or the Wisconsin Equal Rights Division. The Chicago Office of the OCR can be reached at:

U.S. Department of Education
Office for Civil Rights
Chicago Office
John C. Kluczynski Federal Building
230 S. Dearborn Street, 37th Floor
Chicago, IL 60604
Telephone: 312-730-1560
FAX: 312-730-1576
TDD: 800-877-8339
E-mail: OCR.Chicago@ed.gov
Web: <http://www.ed.gov/ocr>

~~John C. Kluczynski Federal Building, 230 S. Dearborn Street, 37th Floor Chicago, IL 60604; Telephone: 312-730-1560; FAX: 312-730-1576; TDD: 800-877-8339; Email: OCR.Chicago@ed.gov; Web: <http://www.ed.gov/ocr>~~

If at any time during the investigation process the investigator determines that the complaint is properly defined as Bullying, under Policy 5517.01 - Bullying and not Harassment under this Policy, because the conduct at issue is not based on a student's Protected Characteristics, the investigator shall transfer the investigation to the appropriate building principal.

Complaint Procedure

~~A Complainant~~ A student who believes s/he has been subjected to harassment hereinafter referred to as the "Complainant", may file a complaint, either orally or in writing with a teacher, principal, or other District employee at the student's school, the CO, Superintendent, or other District ~~official~~ employee who works at another school or at the District level. Due to the sensitivity surrounding complaints of harassment, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a complaint within thirty (30) days after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs a teacher, principal, or other District ~~official~~ employee at the student's school, the CO, Superintendent, or other District employee, either orally or in writing, about any complaint of harassment, that employee must report such information to the CO within two (2) ~~business~~ days.

Throughout the course of the process ~~as described herein~~, the CO should keep the parties ~~reasonably~~ informed of the status of the investigation and the decision-making process.

All complaints must include the following information to the extent ~~known it is available~~: the identity of the ~~Respondent individual believed to have engaged in, or to be actively engaging in, harassment~~; a detailed description of the facts upon which the complaint is based ~~(i.e., when, where, and what occurred)~~; and a list of potential witnesses.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the Compliance Officer shall ask for such details in an oral interview. Thereafter the CO will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document.

Upon receiving a complaint, the CO will consider whether any action should be taken in the investigatory phase to protect the Complainant from further harassment or retaliation including but not limited to a change of class schedule for the Complainant or the ~~Respondent alleged harasser~~, or possibly a change of school for either or both of the parties. The Complainant should be notified of any proposed action prior to such action being taken.

As soon as appropriate in the investigation process, the CO will inform the ~~Respondent individual alleged to have engaged in the harassing conduct, hereinafter referred to as the "Respondent"~~, that a complaint has been received. The Respondent will be informed about the nature of the allegations and a copy of ~~any relevant policies and/or these~~ administrative procedures and the Board's anti-harassment policy shall be provided to the Respondent at that time. The Respondent must also be provided an opportunity to respond to the complaint.

Within five (5) business days of receiving the complaint, the CO will initiate an investigation by at a minimum confirming receipt of the complaint with the complainant and informing the complainant of the investigation process.

~~Investigations shall be completed promptly. What constitutes promptness will depend on the complexity of the issues, the number of incidents or factual elements, the number of witnesses and documents to be consulted, and the availability of witnesses and other evidence. The CO shall keep the complainant reasonably informed of the investigation's progress.~~

~~Within five (5) business days of receiving the complaint, the CO will initiate a formal investigation to determine whether the Complainant has been subject to offensive conduct/harassment. A principal will not conduct an investigation unless directed to do so by the Compliance Officer.~~

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Although certain cases may require additional time, the ~~CO or designee~~ ~~Compliance Officer~~ will attempt to complete an investigation into the allegations of harassment based on a Protected Class or retaliation within fifteen (15) ~~calendar~~ days of receiving the formal complaint.

The investigation will include:

- A. interview(s) with the Complainant;
- B. interview(s) with the Respondent;
- C. interviews with any other witnesses who ~~may~~ reasonably may be expected to have any information relevant to the allegations, as determined by the CO;
- D. consideration of any documentation or other evidence presented by the Complainant, Respondent, or any other witness which is reasonably believed to be relevant to the allegations, as determined by the CO.

At the conclusion of the investigation, the CO shall prepare and deliver a written report to the Superintendent which summarizes the evidence gathered during the investigation and provides recommendations based on the evidence and the definition of harassment as provided in Board policy and State and Federal law as to whether the Respondent engaged in harassment/retaliation of the Complainant ~~Complainant has been subject to harassment~~. In determining if harassment occurred, a preponderance of evidence standard will be used. The CO's recommendations must be based upon the totality of the circumstances, including the ages and maturity levels of those involved.

The CO may consult with the Board's attorney during the course of the investigatory process and/or before finalizing the report to the Superintendent.

In cases where no District CO is able to investigate a complaint due to concerns regarding conflicts, bias or partiality, or for other reasons that impair the CO's ability to conduct an investigation the CO may in consultation with the Superintendent or Board President, if the matter involves the Superintendent, engage outside legal counsel to conduct the investigation consistent with this policy.

Absent extenuating circumstances, within ten (10) ~~business~~ days of receiving the report of the CO, the Superintendent ~~must~~ either must issue a final decision regarding whether or not the complaint of harassment has been substantiated or request further investigation. A copy of the Superintendent's ~~written final~~ decision will be delivered to both the Complainant and the Respondent.

If the Superintendent requests additional investigation, the Superintendent must specify the additional information that is to be gathered, and such additional investigation must be completed within ten (10) ~~business~~ days. At the conclusion of the additional investigation, the Superintendent must issue a final written decision as described above.

The decision of the Superintendent shall be final. If the Complainant feels that the decision does not adequately address the complaint s/he may appeal the decision to the State Superintendent of Public Instruction by submitting a written request to the Wisconsin Department of Public Instruction ("DPI"), Pupil Nondiscrimination Program, or by contacting the DPI Pupil Nondiscrimination Program at (608) 267-9157.

If the decision of the Superintendent is that there is no finding of harassment pursuant to this policy, the student/parent will be informed of the provisions of Policy 5517.01 - Bullying.

The Board reserves the right to investigate and resolve a complaint or report of harassment regardless of whether the member of the School District community or ~~Third Party~~ ~~third party~~ alleging the harassment pursues the complaint. The Board also reserves the right to have the complaint investigation conducted by an external person in accordance with this policy or in such other manner as deemed appropriate by the Board.

The parties may be represented, at their own cost, at any of the above-described meetings/hearings.

The right of a person to a prompt and equitable resolution of the complaint shall not be impaired by the person's pursuit of other remedies such as the filing of a complaint with the Office for Civil Rights, the filing of charges with local law enforcement, or the filing of a civil action in court. Use of this internal complaint process is not a prerequisite to the pursuit of other remedies.

Additional School District Action

If the evidence suggests that the harassment at issue is a crime or requires mandatory reporting under the Children's Code (Sec. 48.981, Wis. Stat.), the CO or Superintendent shall report the harassment to the appropriate social service and/or law enforcement agency charged with responsibility for handling such investigations and crimes. 170

Any reports made to the local child protection service or to local law enforcement shall not terminate the CO's obligation and responsibility to continue to investigate a complaint of harassment. While the COs may work cooperatively with outside agencies to conduct concurrent investigations, in no event shall the harassment investigation be inhibited by the involvement of outside agencies without good cause after consultation with the Superintendent.

Privacy/Confidentiality

The District will make all reasonable efforts to protect the rights of the Complainant and the Respondent. The District will respect the privacy of the Complainant, the Respondent, and all witnesses in a manner consistent with the District's legal obligations under State and Federal law. Confidentiality cannot be guaranteed, however. Additionally, the Respondent must be provided the Complainant's identity. ~~All Complainants proceeding through the investigation process should be advised that as a result of the investigation, the Respondent may become aware of the Complainant's identity.~~

During the course of an investigation, the CO or designee will instruct all members of the School District community and third parties who are interviewed about the importance of maintaining confidentiality. Any individual who is interviewed as part of a harassment investigation is expected not to disclose any information that is learned or provided ~~s/he learns or that s/he provides~~ during the course of the investigation.

Remedial Action Sanctions and Monitoring

If warranted, appropriate remedial action shall be determined and implemented on behalf of the Complainant, including but not limited to counseling services, reinstatement of leave taken because of the discrimination, or other appropriate action.

The Board may appoint an individual, who may be a District employee, to follow up with the Complainant to ensure no further discrimination or retaliation has occurred and to take action to address any reported occurrences promptly.

Sanctions and Disciplinary Action

The Board shall vigorously enforce its prohibitions against harassment by taking appropriate action reasonably calculated to stop the harassment and prevent further ~~misconduct~~ such harassment.

While observing the principles of due process, a violation of this policy may result in disciplinary action up to and including the discharge of an employee or the suspension/expulsion of a student. All disciplinary action will be taken in accordance with applicable law.

When imposing discipline, the Superintendent shall consider the totality of the circumstances involved in the matter, including the ~~ages~~ ages and maturity ~~level~~ levels of ~~any student~~ those involved. In those cases where harassment is not substantiated, the Board may consider whether the alleged conduct nevertheless warrants discipline in accordance with other Board policies.

Where the Board becomes aware that a prior ~~disciplinary~~ remedial action has been taken against ~~the Respondent~~ a member of the School District community, all subsequent sanctions imposed by the Board and/or Superintendent shall be reasonably calculated to end such conduct, prevent its recurrence, and remedy its effects.

Retaliation

Retaliation against a person who makes a report or files a complaint alleging harassment/retaliation or participates as a witness in an investigation is prohibited. Neither the Board nor any other person may intimidate, threaten, coerce or interfere with any individual because the person opposed any act or practice made by any Federal or State civil rights law, or because that individual made a report, formal complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under those laws and/or this policy, or because that individual exercised, enjoyed, aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by those laws and/or this policy.

Retaliation against a person for making a report of discrimination, filing a formal complaint, or participating in an investigation or meeting is a serious violation of this policy that can result in imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

Formal complaints alleging retaliation may be filed according to the internal complaint process set forth above.

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

Reprisal

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Submission of a good faith complaint or report of harassment will not affect the Complainant's status or educational environment. However, the Board also recognizes that false or fraudulent claims of harassment or false or fraudulent information about such claims may be filed. The Board reserves the right to discipline any person filing a false or fraudulent claim of harassment or false or fraudulent information about such a claim.

The District will discipline or take appropriate action against any member of the School District community who retaliates against any person who reports an incident of harassment prohibited by this policy or participates in a proceeding, investigation, or hearing relating to such harassment. Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment.

Education and Training

In support of this policy, the Board promotes preventative educational measures to create greater awareness of discriminatory practices. The Superintendent will develop a method of discussing this policy with the School District community. Training on the requirements of non-discrimination and the appropriate responses to issues of harassment will be provided to the School District community at such times as the Board in consultation with the Superintendent determines is necessary or appropriate.

This policy shall be reviewed at least annually for compliance with local, State, and Federal law.

The District shall conspicuously post a notice including this policy against harassment in each school in a place accessible to the School District community and members of the public. This notice shall also include the name, mailing address and telephone number of the Compliance Officers, the name, mailing address and telephone number of the State agency responsible for investigating allegations of discrimination in educational opportunities, and the mailing address and telephone number of the United States Department of Education, Office for Civil Rights.

A summary of this policy shall appear in the student handbook and shall be made available upon request of parents, students, and other interested parties.

Retention of ~~Public Records, Student Records, and~~ Investigatory Records and Materials

The CO is responsible for overseeing retention of all records that must be maintained pursuant to this policy. All individuals charged with conducting investigations under this policy shall retain all information, documents, electronically stored information ("ESI"), and electronic media (as defined in Policy 8315) created and received as part of an investigation including but not limited to:

- A. all written reports/allegations/complaints/statements;
- B. narratives of all verbal reports, allegations, complaints, and statements collected;
- C. a narrative of all actions taken by District personnel;
- D. any written documentation of actions taken by District personnel or individuals contracted or appointed by the Board to fulfill its responsibilities;
- E. narratives of, notes from, or audio, video, or digital recordings of witness statements;
- F. all documentary evidence;
- G. e-mails, texts, or social media posts pertaining to the investigation;
- H. contemporaneous notes in whatever form made (e.g., handwritten, keyed into a computer or tablet, etc.) pertaining to the investigation;
- I. written disciplinary sanctions issued to students or employees and a narrative of verbal disciplinary sanctions issued to students or employees for violations of the policies and procedures prohibiting discrimination or harassment;
- J. dated written determinations to the parties;
- K. dated written descriptions of verbal notifications to the parties;
- L. written documentation of any supportive interim measures offered and/or provided to the Complainant and/or the Respondent/Complainants, including no contact orders issued to both parties, the dates issued, and the dates the parties

acknowledged receipt; and

- M. documentation of all actions taken, both individual and systemic, to stop the discrimination or harassment, prevent its recurrence, eliminate any hostile environment, and remedy its discriminatory effects. 172
- N. copies of the Board policy and/or procedures/guidelines used by the District to conduct the investigation, and any documents used by the District at the time of the alleged violation to communicate the Board's expectations to students and staff with respect to the subject of this policy (e.g., Student Code of Conduct and/or Employee Handbooks);
- O. copies of any documentation that memorializes any formal or informal resolutions to the alleged discrimination or harassment;
- P. documentation of any training provided to District personnel related to this policy, including but not limited to, notification of the prohibitions and expectations of staff set forth in this policy and the role and responsibility of all District personnel involved in enforcing this policy, including their duty to report alleged violations of this policy and/or conducting an investigation of an alleged violation of this policy.
- Q. ~~documentation that any rights or opportunities that the District made available to one party during the investigation were made available to the other party on equal terms;(-)~~
- R. ~~copies of any notices sent to the alleged perpetrator/responding party of the allegations constituting a potential violation of this policy;(-)~~
- S. ~~copies of any notices sent to the Complainant and the Respondent in advance of any interview or hearing;(-)~~
- T. ~~copies of any documentation or evidence used during informal and formal disciplinary meetings and hearings, including the investigation report, and any written responses submitted by the Complainant or the Respondent.)(-)~~

The information, documents, ESI, and electronic media (as defined in Policy 8315) retained may include public records and records exempt from disclosure under Federal and/or State law (e.g., student records).

The information, documents, ESI, and electronic media (as defined in Policy 8315) created or received as part of an investigation shall be retained in accordance with Policy 8310, Policy 8315, Policy 8320, Policy 8330 for not less than three (3) years, but longer if required by the District's records retention schedule.

~~Revised 4/24/19~~

~~Revised 9/6/19~~

~~T.C. 6/22/20~~

~~Revised 2/17/21~~

~~T.C. 7/14/21~~

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Legal

48.981, Wis. Stats.

118.13, Wis. Stats.

P.I. 9, Wis. Admin. Code

P.I. 41 Wis. Admin. Code

20 U.S.C. 1400 et seq., the Individuals with Disabilities Education Act of 2004, as amended (IDEA)

29 U.S.C. 794, Section 504 of the Rehabilitation Act of 1973, as amended

42 U.S.C. 1983

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

42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended

34 C.F.R. Part 104, Section 504 Regulations

34 C.F.R. Part 300, IDEA Regulations

Cross References [5517 F2 - Student Bullying Complaint Form](#)
 [5517F1 - Student Harassment Complaint Form](#)

Last Modified by Ellen Suckow on October 29, 2021

**D.C. Everest Area School District**

1699 Schofield Ave, Suite 300
Schofield, WI 54476
Phone 715-359-4221
www.dce.k12.wi.us

Emily Seehafer
Director of Finance

MISSION STATEMENT

D.C. Everest Area School District, in partnership with the community, is committed to being an innovative educational leader in developing knowledgeable, productive, caring, creative, responsible individuals prepared to meet the challenges of an ever-changing global society.

TO: Matthew Spets, Assistant Superintendent of Business/Personnel Services
Dr. Kristine Gilmore, Superintendent

FROM: Emily Seehafer, Director of Finance

RE: 2020-2021 Financial Audit

DATE: November 17, 2021

Attached is the final audit report for the past school year completed by Hawkins Ash CPAs. The audit was an unmodified opinion, which in audit terminology is a good meaning.

The District's audited fund balance is \$11,337,982, which is up \$1,155,006 from the start of the 2020-21 school year. This equates to 13.9% of total revenues. Of this fund balance, \$12,490 is restricted for carryover Common School Funds and \$215,638 is nonspendable for those assets recorded as prepaid expenses as of June 30, 2021. The remaining fund balance of \$11,109,854 is unassigned and represents equity available for any purpose.

I recommend the School Board to accept these reports.

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

**FINANCIAL STATEMENTS
WITH INDEPENDENT AUDITORS' REPORT**

JUNE 30, 2021

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MEMBERS OF THE BOARD OF EDUCATION

President	Katie Felch
Vice President	Lindsey Lewitzke
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Member	Corina Norrbom
Member	Bruce Krueger
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Assistant Superintendent	Matt Spets
Assistant Superintendent	Casey Nye
Director of Finance	Emily Seehafer



INDEPENDENT AUDITORS' REPORT

To the Board of Education
D.C. Everest Area School District
Schofield, Wisconsin

Report on the Financial Statements

We have audited the accompanying financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the D.C. Everest Area School District, as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the District's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

D.C. Everest Area School District's management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditors' Responsibility

Our responsibility is to express opinions on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Opinions

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities, each major fund, and the aggregate remaining fund information of the D.C. Everest Area School District as of June 30, 2021, and the respective changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis, budgetary comparison information, Wisconsin Retirement System pension schedules, Wisconsin Retirement System local retiree life insurance fund, and OPEB healthcare defined benefit plan schedules, as listed in the table of contents, be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the D.C. Everest Area School District's basic financial statements. The combining and individual nonmajor fund financial statements, and schedule of charter school authorizer operating costs are presented for purposes of additional analysis and are not a required part of the basic financial statements. The schedule of expenditures of federal awards and state financial assistance are presented for purposes of additional analysis as required by Title 2 U.S. *Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* and *State Single Audit Guidelines* issued by the Wisconsin Department of Administration, and are also not a required part of the basic financial statements.

The combining and individual nonmajor fund financial statements, schedule of charter school authorizer operating costs, schedule of expenditures of federal awards, and state financial assistance are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of

America. In our opinion, this information is fairly stated in all material respects in relation to the basic financial statements as a whole.

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Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated November 1, 2021, on our consideration of the D.C. Everest Area School District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering D.C. Everest Area School District's internal control over financial reporting and compliance.

HAWKINS ASH CPAS, LLP

A handwritten signature in cursive script that reads "Hawkins Ash CPAs, LLP".

Manitowoc, Wisconsin

November 1, 2021

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN
MANAGEMENT'S DISCUSSION AND ANALYSIS**



D.C. Everest Area School District

1699 Schofield Ave, Suite 300
Schofield, WI 54476
Phone 715-359-4221

Emily Seehafer
Director of Finance

MISSION STATEMENT

D.C. Everest Area School District, in partnership with the community, is committed to being an innovative educational leader in developing knowledgeable, productive, caring, creative, responsible individuals prepared to meet the challenges of an ever-changing global society.

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Management's Discussion and Analysis

Fiscal Year Ending June 30, 2021

The following discussion and analysis is of the D.C. Everest Area School District's annual financial performance during the fiscal year ending June 30, 2021. Please read it in conjunction with the District's financial statements immediately following this section.

The Management's Discussion and Analysis (MD&A) is Required Supplementary Information specified in the Governmental Accounting Standard Board's (GASB) Statement No. 34 - Basic Financial Statements - and Management's Discussion and Analysis - for State and Local Governments issued in June 1999. Certain comparative information between this reported fiscal year and the prior fiscal year is required to be presented in the MD&A.

FINANCIAL HIGHLIGHTS

- Total governmental general revenues based off the Statement of Activities were \$94,965,886 to include \$27,543,229 of property and other taxes and \$53,010,714 of general state and federal aid. Total governmental activities expenditures were \$84,419,049 including \$47,988,633 for direct instruction.
- The District's financial status, per the Statement of Net Position, increased by \$10,546,837.

OVERVIEW OF THE FINANCIAL STATEMENTS

The basic financial statements are comprised of **1)** district-wide financial statements, **2)** fund financial statements, and **3)** notes to the financial statements. In addition, other information supplemental to the basic financial statements is provided.

The basic financial statements consist of two kinds of statements that present different views of the District's financial activities.

- The **Statement of Net Position and Statement of Activities** provide information on a district-wide basis. The statements present an aggregate view of the District's finances. District-wide statements contain useful long-term information as well as information for the just-completed fiscal year.
- The remaining statements are **fund financial statements** that focus on individual parts of the District. Fund statements generally report operations in more detail than the district-wide statements.

The **notes to the financial statements** provide further explanation of some of the information in the statements. They also provide additional disclosures so statement users have a complete picture of the District's financial activities and position.

Required supplementary information further explains and supports the financial statements by including a comparison of the District's budget data for the year.

The major features of the District's financial statements, including the activities reported and the type of information contained are shown in the following table.

	District-wide Statements	Fund Financial Statements	
		Governmental	Fiduciary
Scope	Entire district (except fiduciary funds)	Activities of the District for instruction, the support of instruction, special projects and revenue, debt service, food service, community education, and capital projects as needed.	Assets held by the District on behalf of someone else.
Required financial statements	Statement of Net Assets Statement of Activities	Balance Sheet Statement of Revenue, Expenditure and Change in Fund Balance	Statement of Fiduciary Net Assets Statement of Change in Fiduciary Net Assets
Basis of accounting and measurement focus	Accrual accounting Economic resources focus	Modified accrual accounting Current financial resources focus	Accrual accounting Economic resources focus
Type of asset and liability information	All assets and liabilities, both financial and capital, short-term and long-term	Generally, consumable assets and liabilities coming due during the year or soon thereafter, no capital assets included.	All assets and liabilities. These funds do not currently contain any capital assets, although they can.
Type of inflow and outflow information	All revenues and expenses during the year, regardless of when cash is received or paid	Revenue for which cash is received during or soon after the end of the year; expenditures when goods or services have been received and the related liability are due and payable during the year or soon thereafter.	All additions and/or deductions during the year, regardless of when cash is received or paid.

The district-wide statements report information about the District as a whole using accounting methods similar to those used by private-sector companies. The statement of activities reports all revenues and expenses used to support the District. The statement of net position reports all assets and liabilities available to support District activities. The two district-wide statements report the District's *net position* and how they have changed. Net position, the difference between the District's assets and liabilities, is one way to measure the District's overall financial position. Increases or decreases in the District's net position are one indicator of whether its financial position is improving or deteriorating respectively. To assess the overall financial condition of the District, additional non-financial factors such as changes in the District's property tax base and the condition of school buildings and other facilities, should be considered.

In the district-wide financial statements, the District's activities are reported as governmental activities. Most of the District's basic services are included here, such as regular and special education, transportation, support services, debt service, capital projects, food service, community programs and administration. Property taxes and state school aid, finance most of these activities.

FUND FINANCIAL STATEMENTS

The fund financial statements provide more detailed information about the District's funds, focusing on its most significant or "major" funds - not the District as a whole. Funds are accounting devices the District uses to keep track of sources of funding and spending on particular programs and to demonstrate compliance with various regulatory requirements. Some funds are required by state law and by bond covenants. The District establishes other funds to control and manage money for particular purposes (like repaying its long-term debt), or to show that it is properly using certain revenues (like capital project funds).

The District has two kinds of funds:

- **Governmental funds** - Most of the District's basic services are included in governmental funds, which generally focus on (1) how cash and other financial assets can readily be converted to cash flow in and out; (2) the balances left at year-end that are available for funding future basic services. Governmental funds statements provide a detailed short-term view that help determine whether there are more or fewer financial resources that can be spent in the near future to finance the District's programs. Governmental funds information does not report on long-term commitments as is reported on the district-wide statements.
- **Fiduciary funds** - The District serves as a trustee, or fiduciary, for OPEB employee benefit trust fund and private purpose trust fund. The District is responsible for ensuring that the assets reported in these funds are used only for their intended purposes, and only by those to whom the assets belong. These activities are excluded from the district-wide financial statements because the District cannot use these assets to finance its operations.

The District as a Whole

Table 1 provides a summary of the District's net position for year ending June 30, 2021 compared with the prior year. The District's total assets and deferred outflows of resources were \$212,251,636. The District's total liabilities and deferred inflows of resources were \$149,106,536. The District's net position was \$63,145,100. The District's combined net position increased by \$10,546,837.

**Table 1
D.C. Everest Area School District
Statement of Net Position**

	Governmental Activities	
	As of June 30, 2020	As of June 30, 2021
Current and other assets	\$ 72,819,054	\$ 59,048,118
Capital assets	103,019,906	126,367,731
Deferred outflow of resources	19,312,014	26,835,787
Total Assets	195,150,974	212,251,636
Current liabilities	18,571,410	16,693,356
Long-term liabilities	98,571,720	97,020,479
Deferred inflow of resources	25,409,581	35,392,701
Total Liabilities	142,552,711	149,106,536
Net assets		
Investment in capital assets, net of related debt	14,529,279	38,374,785
Restricted	50,532,060	36,856,234
Unrestricted	(12,463,076)	(12,085,919)
Total Net Assets	\$ 52,598,263	\$ 63,145,100
Increase (Decrease)		\$ 10,546,837

Table 2 provides summarized operating results and their impact on net position. The District relies primarily on state and federal aids 56% and property taxes 29% of total revenues to fund governmental activities. These two funding sources make up 85% of the total revenues. All other revenues accounted for 15% of total revenue for the year.

The District's total revenues were \$94,965,886 for the year ending June 30, 2021.

The total cost of all programs and services was \$84,419,049. The district experienced an increase in net position of \$10,546,837. The District's expenses are predominantly related to educating and caring for students. Those costs not directly related to instruction are incurred in support of the instructional mission.

Table 2
D.C. Everest Area School District
Statement of Activities

	Governmental Activities	
	As of	As of
	June 30, 2020	June 30, 2021
Revenues:		
Program revenues		
Charges for services	\$ 2,128,763	\$ 960,089
Grants and contributions	5,824,006	7,471,517
General revenues		
Property taxes	27,071,881	27,543,229
State aid - formula grants	47,753,959	53,010,714
Other	6,299,449	5,980,337
Total Revenues	<u>89,078,058</u>	<u>94,965,886</u>
Expenses:		
Instruction	44,619,144	47,988,633
Pupil and instructional services	8,491,709	7,804,533
Administration and business	21,173,107	18,821,108
Interest and other	2,980,757	3,340,731
Other expenses	6,607,776	6,464,044
Total Expenses	<u>83,872,493</u>	<u>84,419,049</u>
Change in net assets	<u>\$ 5,205,565</u>	<u>\$ 10,546,837</u>

Net Cost of Governmental Activities.

Table 3 presents the cost of the major district activities. The table reports each activities net cost (total cost less fees generated by the activities and intergovernmental aid provided for specific programs). The net cost reflects the financial burden that was placed on the District's taxpayers by each of these functions.

The net cost of all governmental activities this year was \$75,987,443.

Table 3
D.C. Everest Area School District
Net Cost of Governmental Activities

	Net Cost of Services 2020	Net Cost of Services 2021
Expenses		
Instruction	\$ 40,636,667	\$ 43,663,047
Pupil and instructional services	8,202,263	7,544,653
Administration and business	18,544,783	15,679,674
Interest on debt	2,980,757	3,340,731
Other	5,555,254	5,759,338
Total	\$ 75,919,724	\$ 75,987,443

General Fund Budgetary Highlights

Over the course of the year, the District revised the annual operating budget several times. These budget amendments fall into three categories:

1. Implementing budgets for specially funded projects, which include both federal and state grants.
2. Increasing appropriations for significant unbudgeted costs.
3. Reallocating the budget between functional lines.

The District prepares and reviews an interim budget in spring for the subsequent year. Consistent with current state statutes and regulations, an original budget is adopted in October following determination of official enrollment and certification of general state aids. Generally, the original budget is not significantly modified.

The District's General Fund for 2020-21 showed an equity increase by \$1,155,006 resulting in a fund balance of \$11,337,982, 13.9% of revenues.

- Actual General Fund revenues and other financing sources (including fund 27) were \$85,450,713.
- Actual General Fund expenditures and other financing uses (including fund 27) were \$84,295,707.

The District's Total Governmental Fund for 2020-21 showed an equity decrease by \$19,684,456 resulting in a fund balance of \$32,752,019.

- Actual Governmental Fund revenues and other financing sources were \$103,553,230.
- Actual Governmental Fund expenditures and other financing uses were \$123,237,686.

The change to the total governmental fund balance was due the following:

Table 4
D.C. Everest Area School District
Changes in Governmental Fund Balance

Fund	Fund Name	Increase (Decrease) in Fund Balance	
10/27	General Fund	\$	1,155,006
21	Special Revenue Fund		(65,806)
38	Non-Referendum Debt Service Fund		(16,777)
39	Referendum Debt Service Fund		(270,653)
46	Capital Improvement Trust Fund		3,652,744
49	Other Capital Projects Fund		(24,355,904)
50	Food Service Fund		372,324
80	Community Service Fund		(155,390)
Total		\$	(19,684,456)

Capital Assets

At the end of the fiscal year, the District had \$170 million in a broad range of capital assets, including land, sites & improvements, buildings, and equipment. Total accumulated depreciation on these assets was \$43.6 million.

- Asset acquisitions during this fiscal year for governmental activities totaled \$30,318,806.
- Asset deletions during this fiscal year for governmental activities totaled \$4,162,070.
- The District recognized depreciation expense of \$4,626,442 for Governmental Activities during this fiscal year.

Table 5
D.C. Everest Area School District
Capital Assets

	2020 Governmental Activities	2021 Governmental Activities
Land	\$ 821,265	\$ 835,973
Construction in progress	53,499,020	77,193,281
Sites and improvements	4,466,270	5,379,413
Buildings and improvements	70,725,294	71,404,935
Equipment	14,275,106	15,130,089
Capital Assets	143,786,955	169,943,691
Accumulated depreciation	(40,767,049)	(43,575,960)
Assets less depreciation	\$ 103,019,906	\$ 126,367,731

Long-Term Debt

At year-end the District had \$87,810,000 in general obligation debt. Additional information about the District's long-term liabilities is presented in the financial statements.

- The District retired \$10,095,000 of outstanding general obligation bonds.
- The district currently has a Moody's Investors Service rating of Aa3.

Debt of the District is secured by an irrevocable tax levy adopted by the School Board at the time of issuance. Wisconsin state statutes require that the first property tax receipts be segregated for annual debt service payments.

Factors Bearing on the District's Future

Currently known circumstances that will impact the district's financial status in the future are:

- In the 2021-22 school year, the district has levied to its maximum. This will make future school budgets more challenging if State of Wisconsin continues to provide little or no funding increases.
- In the 2021-22 school year, total revenue limit student FTE increased by 49 compared to the prior school year. This will impact future revenue limit capacity. The District has been fortunate to experience relatively stable membership over the past several years.
- With the most recent third Friday Head Count, the district had 430 student Open Enrollment (OE) in and 331 OE out for a positive number of 99. Open enrollment in has continued to exceed open enrollment out which creates a positive funding source for the District.
- The district does not anticipate any significant labor negotiation issues, however is concerned with the tight labor pool and increased wage pressures.
- Key Benefits Concepts, LLC completed an actuarial study of our postretirement benefits in fiscal year 2019 and determined the post-retirement benefit liability as of 6/30/2020 to be \$7,912,535. The trust fund was funded at 58% with an actuarial value of assets of \$4,635,104 to offset this liability.
- The existence of COVID-19 continues to significantly impact how we provide education to our students. We anticipate this will create long-term school funding issues.

CONTACTING THE DISTRICT'S FINANCIAL MANAGEMENT

This financial report is designed to provide our citizens, taxpayers, customers, investors and creditors with a general overview of the District's finances to demonstrate the District's accountability for the money it receives.

If you have questions about this report or need additional financial information, contact Emily Seehafer, CPA, Director of Finance, by mail at 1699 Schofield Ave, Suite 300, Schofield, Wisconsin 54476, by phone at (715) 359-4221, ext. 1213, or by email at eseehafer@dce.k12.wi.us

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

**BASIC
FINANCIAL STATEMENTS**

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

**DISTRICT-WIDE
FINANCIAL STATEMENTS**

D.C. EVEREST AREA SCHOOL DISTRICT
STATEMENT OF NET POSITION
JUNE 30, 2021

192

	<u>GOVERNMENTAL ACTIVITIES</u>
ASSETS	
Cash and investments	\$ 33,417,842
Receivables	
Accounts	128,420
Taxes	7,071,832
Due from other governments	2,784,679
Prepaid expenses	215,638
Wisconsin Retirement System net pension	15,429,707
Capital assets (net of accumulated depreciation)	
Capital assets not being depreciated	78,029,254
Capital assets being depreciated	<u>48,338,477</u>
TOTAL ASSETS	<u>185,415,849</u>
DEFERRED OUTFLOWS OF RESOURCES	
Wisconsin Retirement System pension	24,076,448
Wisconsin Retirement System LRLIF	1,677,472
OPEB healthcare	<u>1,081,867</u>
TOTAL DEFERRED OUTFLOWS OF RESOURCES	<u>26,835,787</u>
TOTAL ASSETS AND DEFERRED OUTFLOWS OF RESOURCES	<u><u>212,251,636</u></u>
LIABILITIES	
Accounts payable	3,411,412
Self insurance claims payable	72,135
Accrued liabilities	
Payroll, payroll taxes, insurance	7,178,411
Interest	798,207
Due to external parties	8,716
Unearned revenue	195,718
Current portion of long-term obligations	5,028,757
Noncurrent portion of long-term obligations	<u>97,020,479</u>
TOTAL LIABILITIES	<u>113,713,835</u>
DEFERRED INFLOWS OF RESOURCES	
Revenue on refunding	20,195
Wisconsin Retirement System pension	33,786,486
Wisconsin Retirement System LRLIF	458,587
OPEB healthcare	<u>1,127,433</u>
TOTAL DEFERRED INFLOWS OF RESOURCES	<u>35,392,701</u>
NET POSITION	
Net investment in capital assets	38,374,785
Restricted for	
Special revenue	2,047,002
Debt service	1,992,134
Capital projects	17,374,901
Other activities	15,442,197
Unrestricted	<u>(12,085,919)</u>
TOTAL NET POSITION	<u>63,145,100</u>
TOTAL LIABILITIES, DEFERRED INFLOWS OF RESOURCES, AND NET POSITION	<u>\$ 212,251,636</u>

The accompanying notes are an integral part of these statements.

D.C. EVEREST AREA SCHOOL DISTRICT

STATEMENT OF ACTIVITIES
YEAR ENDED JUNE 30, 2021

193

FUNCTIONS/PROGRAMS	EXPENSES	PROGRAM REVENUE		NET (EXPENSES) REVENUE AND CHANGES IN NET POSITION
		CHARGES FOR SERVICES	OPERATING GRANTS AND CONTRIBUTIONS	
GOVERNMENTAL ACTIVITIES				
Instruction				
Regular instruction	\$ 34,671,129	\$ 3,716	\$ 89,989	\$ (34,577,424)
Vocational instruction	1,906,838	10,399	25,582	(1,870,857)
Special instruction	7,699,447	-	4,158,958	(3,540,489)
Other instruction	3,711,219	36,942	-	(3,674,277)
Total instruction	<u>47,988,633</u>	<u>51,057</u>	<u>4,274,529</u>	<u>(43,663,047)</u>
Support services				
Pupil services	3,925,654	-	-	(3,925,654)
Instructional staff services	3,878,879	-	259,880	(3,618,999)
General administration services	542,324	-	-	(542,324)
Building administration services	3,057,004	-	-	(3,057,004)
Business services	12,549,469	211,916	2,929,518	(9,408,035)
Central services	2,079,189	-	-	(2,079,189)
Insurance	593,122	-	-	(593,122)
Interest and other	3,340,731	-	-	(3,340,731)
Other support services	1,656,653	-	-	(1,656,653)
Community services	881,136	697,116	7,590	(176,430)
Total support services	<u>32,504,161</u>	<u>909,032</u>	<u>3,196,988</u>	<u>(28,398,141)</u>
Non-program transactions	3,926,255	-	-	(3,926,255)
TOTAL GOVERNMENTAL ACTIVITIES	<u>\$ 84,419,049</u>	<u>\$ 960,089</u>	<u>\$ 7,471,517</u>	<u>(75,987,443)</u>
General revenues				
Taxes				
Property taxes				
				27,476,773
Other taxes				
				66,456
State and federal aids not restricted to specific functions				
				53,010,714
Interest and investment earnings				
				189,329
Miscellaneous				
				5,791,008
Total general revenues				
				<u>86,534,280</u>
CHANGE IN NET POSITION				
				10,546,837
NET POSITION - BEGINNING OF YEAR				
				52,598,263
NET POSITION - END OF YEAR				
				<u>\$ 63,145,100</u>

The accompanying notes are an integral part of these statements.

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

**FUND
FINANCIAL STATEMENTS**

D.C. EVEREST AREA SCHOOL DISTRICT
 BALANCE SHEET
 GOVERNMENTAL FUNDS
 JUNE 30, 2021

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	10/27	39	49	21/38/46/50/80	
	GENERAL	DEBT SERVICE FUND	OTHER	TOTAL NONMAJOR	TOTAL
	FUND	REFERENDUM APPROVED	CAPITAL PROJECTS	GOVERNMENTAL FUNDS	GOVERNMENTAL FUNDS
ASSETS					
Cash and investments	\$ 13,427,551	\$ 1,533,984	\$ 12,134,872	\$ 6,321,435	\$ 33,417,842
Receivables					
Accounts	1,114	-	-	127,306	128,420
Taxes	7,071,832	-	-	-	7,071,832
Due from other funds	57,056	-	85,921	4,042,389	4,185,366
Due from other governments	2,667,862	-	-	116,817	2,784,679
Prepaid expenses	215,638	-	-	-	215,638
TOTAL ASSETS	<u>23,441,053</u>	<u>1,533,984</u>	<u>12,220,793</u>	<u>10,607,947</u>	<u>47,803,777</u>
LIABILITIES					
Accounts payable	878,038	-	2,441,756	91,618	3,411,412
Self insurance claims payable	72,135	-	-	-	72,135
Accrued payroll liabilities	7,101,793	-	-	76,618	7,178,411
Due to other funds	4,051,105	-	-	142,977	4,194,082
Unearned revenue	-	-	-	195,718	195,718
TOTAL LIABILITIES	<u>12,103,071</u>	<u>-</u>	<u>2,441,756</u>	<u>506,931</u>	<u>15,051,758</u>
FUND BALANCES					
Nonspendable	215,638	-	-	-	215,638
Restricted	12,490	1,533,984	9,779,037	10,101,016	21,426,527
Unassigned	11,109,854	-	-	-	11,109,854
TOTAL FUND BALANCES	<u>11,337,982</u>	<u>1,533,984</u>	<u>9,779,037</u>	<u>10,101,016</u>	<u>32,752,019</u>
TOTAL LIABILITIES AND FUND BALANCES	<u>\$ 23,441,053</u>	<u>\$ 1,533,984</u>	<u>\$ 12,220,793</u>	<u>\$ 10,607,947</u>	

Total net position reported for governmental activities in the statement of net position is different from the amount reported above as total governmental funds fund balance because:

Capital assets used in governmental activities are not financial resources and therefore are not reported in the fund statements. Amounts reported for governmental activities in the statement of net position are:

Governmental capital asset	\$ 169,943,691	
Governmental accumulated depreciation	<u>(43,575,960)</u>	126,367,731

Wisconsin Retirement System asset, deferred inflows of resources, and deferred outflows of resources are not current financial resources and are not reported in fund statements:

6,938,554

Other post employment benefits deferred inflows of resources and deferred outflows of resources are not current financial resources and are not reported in fund statements:

(45,566)

Long-term liabilities are not due in the current period and therefore are not reported in the fund statements. Long-term liabilities reported in the statement of net position that are not reported in the funds balance sheet are:

General obligation debt	\$ (87,810,000)	
Premium	(3,654,720)	
Capital leases	(3,324,931)	
Deferred revenue on refunding	(20,195)	
Accrued interest	(798,207)	
WRS liability	(3,942,131)	
Vested employee benefits	(40,023)	
Net OPEB obligation	<u>(3,277,431)</u>	<u>(102,867,638)</u>

Total net position - governmental activities **\$ 63,145,100**

The accompanying notes are an integral part of these statements.

D.C. EVEREST AREA SCHOOL DISTRICT
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES
GOVERNMENTAL FUNDS
YEAR ENDED JUNE 30, 2021

196

	10/27	39	49	21/38/46/50/80	
	GENERAL	DEBT SERVICE	OTHER	TOTAL	TOTAL
	FUND	REFERENDUM	CAPITAL PROJECTS	NONMAJOR	GOVERNMENTAL
		APPROVED		GOVERNMENTAL	GOVERNMENTAL
				FUNDS	FUNDS
REVENUES					
Property taxes	\$ 19,233,947	\$ 6,664,759	\$ -	\$ 1,644,523	\$ 27,543,229
Other local sources	197,415	6,296	163,169	1,430,661	1,797,541
Interdistrict sources	3,879,296	-	-	-	3,879,296
Intermediate sources	5,298	-	-	-	5,298
State sources	52,504,443	-	-	52,843	52,557,286
Federal sources	5,176,900	-	-	2,688,578	7,865,478
Other sources	439,793	-	-	43,759	483,552
TOTAL REVENUES	81,437,092	6,671,055	163,169	5,860,364	94,131,680
EXPENDITURES					
Current					
Instruction					
Regular instruction	33,053,786	-	-	436,207	33,489,993
Vocational instruction	2,057,739	-	-	-	2,057,739
Special instruction	8,259,797	-	-	-	8,259,797
Other instruction	3,808,006	-	-	121,209	3,929,215
Total instruction	47,179,328	-	-	557,416	47,736,744
Support services					
Pupil services	4,219,746	-	-	-	4,219,746
Instructional staff services	4,124,046	-	-	-	4,124,046
General administration services	568,061	-	-	-	568,061
Building administration services	3,267,213	-	-	-	3,267,213
Business services	9,796,136	-	24,519,073	3,100,808	37,416,017
Central services	897,679	-	-	76	897,755
Insurance	593,122	-	-	-	593,122
Other support services	1,725,069	-	-	-	1,725,069
Community services	-	-	-	867,036	867,036
Total support services	25,191,072	-	24,519,073	3,967,920	53,678,065
Non-program transactions	3,929,192	-	-	1,627	3,930,819
Debt service					
Principal	663,856	8,285,000	-	500,000	9,448,856
Interest	23,314	2,472,251	-	911,300	3,406,865
Other	2,138	80,792	-	-	82,930
Total debt service	689,308	10,838,043	-	1,411,300	12,938,651
Capital outlay	3,306,807	-	-	135,006	3,441,813
TOTAL EXPENDITURES	80,295,707	10,838,043	24,519,073	6,073,269	121,726,092
EXCESS (DEFICIENCY) OF REVENUES OVER EXPENDITURES	1,141,385	(4,166,988)	(24,355,904)	(212,905)	(27,594,412)
OTHER FINANCING (USES) SOURCES					
Net transfer (to) from other funds	(4,000,000)	-	-	4,000,000	-
Capital lease proceeds	3,179,415	-	-	-	3,179,415
Sale of capital assets	834,206	-	-	-	834,206
Issuance of long-term debt	-	5,195,000	-	-	5,195,000
Payment to debt escrow agent	-	(1,511,594)	-	-	(1,511,594)
Premium on refunding bonds issued	-	212,929	-	-	212,929
TOTAL OTHER FINANCING (USES) SOURCES	13,621	3,896,335	-	4,000,000	7,909,956
NET CHANGE IN FUND BALANCE	1,155,006	(270,653)	(24,355,904)	3,787,095	(19,684,456)
FUND BALANCE - BEGINNING OF YEAR	10,182,976	1,804,637	34,134,941	6,313,921	52,436,475
FUND BALANCE - END OF YEAR	\$ 11,337,982	\$ 1,533,984	\$ 9,779,037	\$ 10,101,016	\$ 32,752,019

The accompanying notes are an integral part of these statements.

D.C. EVEREST AREA SCHOOL DISTRICT

RECONCILIATION OF THE STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES 197
 OF GOVERNMENTAL FUNDS TO THE STATEMENT OF ACTIVITIES
 YEAR ENDED JUNE 30, 2021

Net change in fund balances - total governmental funds \$ (19,684,456)

Amounts reported for governmental activities in the statement of activities are different because:

The acquisition of capital assets are reported in the governmental funds as expenditures. However, for governmental activities those costs are shown in the statement of net position and allocated over their estimated useful lives as annual depreciation expenses in the statement of activities.

Capital outlay reported in fund statements	\$ 3,441,813	
Capital outlay reported as other expenses in fund statements	26,876,993	
Depreciation expense reported in the statement of activities	(4,626,442)	
Net book value of capital assets disposed	<u>(2,344,539)</u>	
Amount by which capital outlays are greater than depreciation in the current period:		23,347,825

The amount of the loan and lease is reported in the governmental funds as a source of financing. In the statement of net position however, loans and capital leases are not reported as a financing source, but rather constitute a long-term liability. The amount of loans and capital leases reported in the governmental funds statement is:

(8,374,415)

Certain employee benefits are reported in the governmental funds when amounts are paid. The statement of activities reports the value of benefits earned during the year.

This year the accrual of these benefits decreased by: 125,500

Wisconsin Retirement System pension asset, deferred outflows of resources, liability, and deferred inflows of resources changes: 4,472,450

Wisconsin Retirement System LRLIF asset, deferred outflows of resources, liability, and deferred inflows of resources changes: (489,069)

OPEB healthcare deferred outflows of resources, liability, and deferred inflows of resources changes: 252,417

Repayment of principal on long-term debt is reported in the governmental funds as an expenditure, but is reported as a reduction in long-term debt in the statement of net position and does not affect the statement of activities.

Amount of long-term debt principal payments in the current year is: 10,758,856

In governmental funds interest payments and other debt costs on outstanding debt are reported as an expenditure when paid. In the statement of activities interest is reported as it accrues.

Amount of interest and other debt costs paid during the current period is	\$ 3,478,460	
Amount of interest and other debt costs accrued during the current period is	<u>(3,340,731)</u>	
Interest paid is greater than interest accrued by:		<u>137,729</u>

Change in net position - governmental activities \$ 10,546,837

D.C. EVEREST AREA SCHOOL DISTRICT

STATEMENT OF NET POSITION

FIDUCIARY FUNDS

JUNE 30, 2021

	72	73
	PRIVATE PURPOSE TRUST FUND	PENSION (OTHER EMPLOYEE BENEFIT) TRUST FUND
	<u>SCHOLARSHIPS</u>	<u>EMPLOYEE BENEFIT</u>
ASSETS		
Cash	\$ 209,701	\$ -
Investments	-	4,441,072
Due from other funds	-	8,716
TOTAL ASSETS	<u>209,701</u>	<u>4,449,788</u>
NET POSITION		
Restricted for		
Postemployment benefits other than pensions	-	4,449,788
Individuals and organizations	209,701	-
TOTAL NET POSITION	<u>\$ 209,701</u>	<u>\$ 4,449,788</u>

The accompanying notes are an integral part of these statements.

D.C. EVEREST AREA SCHOOL DISTRICT
STATEMENT OF CHANGES IN NET POSITION
FIDUCIARY FUNDS
YEAR ENDED JUNE 30, 2021

199

	72	73
	PRIVATE PURPOSE TRUST FUND	PENSION (OTHER EMPLOYEE BENEFIT) TRUST FUND
	<u>SCHOLARSHIPS</u>	<u>EMPLOYEE BENEFIT</u>
ADDITIONS		
Investment income	\$ 1,090	\$ 88,496
Contributions	<u>-</u>	<u>759,279</u>
TOTAL ADDITIONS	<u>1,090</u>	<u>847,775</u>
DEDUCTIONS		
Disbursements	<u>18,779</u>	<u>1,033,091</u>
TOTAL DEDUCTIONS	<u>18,779</u>	<u>1,033,091</u>
CHANGE IN NET POSITION	(17,689)	(185,316)
NET POSITION - BEGINNING OF YEAR	<u>227,390</u>	<u>4,635,104</u>
NET POSITION - END OF YEAR	<u>\$ 209,701</u>	<u>\$ 4,449,788</u>

The accompanying notes are an integral part of these statements.

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

**NOTES TO THE BASIC
FINANCIAL STATEMENTS**

NOTE 1 - Summary of Significant Accounting Policies

The financial statements of the D.C. Everest Area School District (the "District") have been prepared in conformity with generally accepted accounting principles (GAAP) in the United States of America as applied to government units. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. The significant accounting principles and policies utilized by the District are described below.

Reporting Entity - The D.C. Everest Area School District is organized as a common school district. The District, governed by a seven member elected school board, operates grades K through 12 and is comprised of all or parts of twelve taxing districts.

The District's basic financial statements do not include any component units, as defined in GASB 14 and amended by GASB 39 and GASB 61, as there are no organizations which meet the criterion. The criterion for including a legally separate organization as a component unit is the degree of financial accountability the District has with the organization. A financial benefit or burden relationship needs to be present between the primary government and that organization for it to be included in the reporting entity as a component unit.

The following circumstances set forth the District's financial accountability for a legally separate organization: the District is financially accountable if it appoints a voting majority of the organization's governing body and (1) it is able to impose its will on that organization or (2) there is a potential for the organization to provide specific financial benefits to, or impose specific financial burdens on the District. The District may be financially accountable if an organization is fiscally dependent on the District regardless of whether the organization has (1) a separately-elected governing body, (2) a governing body appointed by a higher level of government, or (3) a jointly-appointed governing body. In addition, the primary government may determine, through exercise of management's professional judgment, that the inclusion of an organization that does not meet the financial accountability criteria is necessary in order to prevent the reporting entity's financial statements from being misleading.

Basis Of Presentation

District-Wide Statements

The statement of net position and the statement of activities present financial information about the District's governmental activities. These statements include the financial activities of the overall government in its entirety, except those that are fiduciary. Eliminations have been made to minimize the double counting of internal transactions. Governmental activities generally are financed through taxes, intergovernmental revenues, and other nonexchange transactions.

The statement of activities presents a comparison between direct expenses and program revenues for each function of the District's governmental activities. Direct expenses are those that are specifically associated with and are clearly identifiable to a particular function. Program revenues include (a) charges paid by the recipients of goods or services offered by the programs and (b) grants and contributions that are restricted to meeting the operational or capital requirements of a particular program. Revenues that are not classified as program revenues, including all taxes, are presented as general revenues.

NOTE 1 - Summary of Significant Accounting Policies - Continued

Fund Financial Statements

The fund statements provide information about the District's funds, including fiduciary funds. Separate statements for each fund category - governmental and fiduciary - are presented. The emphasis of fund financial statements is on major governmental funds; each displayed in a separate column. All remaining governmental funds are aggregated and reported as non-major funds.

The District reports the following major governmental funds:

General Fund - is used for all financial activity that is not required to be accounted for in another fund. This is the District's primary operating fund.

Referendum Approved Debt Service Fund - is used to account for and report financial resources that are restricted, committed or assigned to expenditures for principal and interest.

Other Capital Projects Fund - is used to account for and report financial resources that are restricted, committed or assigned to expenditure for capital outlays, including the acquisition or construction of capital facilities and other capital assets.

The District has two fiduciary funds which account for scholarships and an employee benefit trust.

Measurement Focus and Basis of Accounting

The district-wide and fiduciary fund financial statements are reported using the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned and expenses are recorded at the time liabilities are incurred, regardless of when the related cash transaction takes place. Nonexchange transactions, in which the District gives or receives value without directly receiving or giving equal value in exchange, include property taxes, grants, entitlements, and donations. On an accrual basis, revenue from property taxes is recognized in the fiscal year for which the taxes are levied. Revenue from grants, entitlements, and donations is recognized in the fiscal year in which all eligibility requirements have been satisfied.

The governmental fund statements are reported using the current financial resources measurement focus and the modified accrual basis of accounting. Under this method, revenues are recognized when measurable and available. The District considers all revenues reported in the governmental funds to be available if the revenues are collected within sixty days after the end of the fiscal year. Expenditures are recorded when the related fund liability is incurred, except for principal and interest on general long-term debt, claims and judgments, and compensated absences which are recognized as expenditures to the extent they have matured. General capital asset acquisitions are reported as expenditures in governmental funds. Proceeds of general long-term debt and acquisitions under capital leases are reported as other financing sources.

NOTE 1 - Summary of Significant Accounting Policies - Continued

Under the terms of grant agreements, the District may fund certain programs by a combination of specific cost-reimbursement grants, categorical block grants, and general revenues. Therefore, when program expenses are incurred, both restricted and unrestricted net position may be available to finance the program. It is the District's policy to first apply cost-reimbursement grant resources to such programs, followed by general revenues.

The fiduciary funds are reported using the economic resources measurement focus and the accrual basis of accounting.

Cash and Investments - The District's cash and cash equivalents consist of cash on hand, demand deposits, and short-term investments with original maturities of three months or less from date of acquisition. All funds share common (pooled) checking and investment accounts unless regulations require separate investment accounts, such as the debt service fund.

Investments are stated at fair value, if applicable, which is the amount at which an investment could be exchanged in a current transaction between willing parties. Fair values are based on quoted market prices. No investments are reported at amortized cost. Adjustments necessary to record investments at fair value are recorded in the operating statement as increases or decreases in investment income. Investment income on commingled investments of municipal accounting funds is allocated based on average investment balances.

Property Tax Levy - Under Wisconsin law, personal property taxes and first and second installment real estate taxes are collected by municipal treasurers who then make proportional settlement with the District and county treasurer for those taxes collected on their behalf. Third installment real estate taxes and delinquent taxes are collected by the county treasurer who then makes settlement with the city, town, village, and the District before retaining any for county purposes. Taxes collected by the township are made in two installments, the first by the town, and the second by the county treasurer.

The District's property taxes are levied on or before November 1 on the equalized property valuation certified by the Department of Revenue. As permitted by a collecting municipality's ordinance, taxes may be paid in full or two or more installments with the first installment payable the subsequent January 31, and a final payment no later than the following July 31. The District is paid by the collecting municipality its proportionate share of tax collections received through the last day of the preceding month on or before January 15, and by the 20 of each subsequent month thereafter. On or before August 20, the county treasurer makes full settlement to the District for any remaining balance. The county assumes all responsibility for delinquent real estate property taxes.

Property taxes are recognized as revenue in the period for which the taxes are levied. The 2020 tax levy is used to finance operations of the District's fiscal year ended June 30, 2021. All property taxes are considered due on January 1, when an enforceable lien may be assessed against the property and the taxpayer is liable for the taxes. All taxes are collected within 60 days of June 30 and are available to pay current liabilities.

Accounts Receivable - Accounts receivable are recorded at gross amounts with uncollectible amounts recognized under the direct write-off method. No allowance for uncollectible accounts has been provided since it is believed that the amount of such allowance would not be material.

NOTE 1 - Summary of Significant Accounting Policies - Continued

Due To/From Other Funds - During the course of operations, transactions occur between individual funds that may result in amounts owed between funds. Short-term interfund loans are reported as due to and from other funds. The amounts reported on the statement of net position for receivable/payable from external parties represents amounts due between different fund types (governmental activities and fiduciary funds). Eliminations have been made for amounts due to and due from within the same fund type.

Interfund Transactions - Non-exchange transactions which are not borrowing/lending (will not be repaid) are recorded as operating transfers, and exchange transactions are recorded as revenues and expenses. Nonrecurring or nonroutine permanent transfers of equity are reported as residual equity transfers.

Prepays - Prepaid items represent payments for goods or services for which benefits extend beyond June 30.

A nonspendable fund balance has been recognized in governmental funds for these non-liquid assets to signify a portion of fund balance is not available for other subsequent expenditures.

Capital Assets - Capital assets are reported at actual cost or estimated historical costs, based on appraisals conducted by an independent third-party professional appraisal firm. Donated assets are reported at estimated fair market value at the time received.

Capitalization thresholds (the dollar value above which asset acquisitions are added to the capital asset accounts), depreciation methods, and estimated useful lives of capital assets reported in the district-wide statements are as follows:

	<u>Capitalization Threshold</u>	<u>Depreciation Method</u>	<u>Estimated Useful Life</u>
Buildings	\$5,000	Straight-line	20-70 years
Land improvements	\$5,000	Straight-line	20 years
Furniture and equipment	\$5,000	Straight-line	5-20 years

Debt Premiums and Discounts - In the government-wide financial statements, debt premiums and discounts are amortized over the life of the debt. Long-term debt is reported net of the applicable debt premium or discount.

In the fund financial statements, premiums and discounts are recognized during the current period. The face amount of debt issued is reported as other financing sources. Premiums on debt issuance are reported as other financing sources while discounts on debt issuance are reported as other financing uses.

Compensated Absences - The District's policy permits employees to accumulate earned, but unused vacation benefits, which are eligible for payment upon separation from government service. The liability for such leave is reported as incurred in the government-wide statements. A liability for those amounts is recorded in the government funds only if the liability has matured as a result of employee resignations or retirements. The liability for compensated absences includes salary related benefits where applicable.

NOTE 1 - Summary of Significant Accounting Policies - Continued

Accumulated sick leave lapses upon separation from government service therefore no monetary obligation exists.

Pensions - For purposes of measuring the net pension liability (asset), deferred outflows of resources and deferred inflows of resources related to pensions, and pension expense (revenue), information about the fiduciary net position of the Wisconsin Retirement System (WRS) and additions to/deductions from WRS' fiduciary net position have been determined on the same basis as they are reported by WRS. For this purpose, benefit payments (including refunds of employee contributions) are recognized when due and payable in accordance with the benefit terms. Investments are reported at fair value.

Other Post-Employment Benefits (OPEB) - The fiduciary net position of the local retiree life insurance fund (LRLIF) has been determined using the flow of economic resources measurement focus and the accrual basis of accounting. This includes for purposes of measuring the net OPEB liability, deferred outflows of resources, and deferred inflows of resources related to other post-employment benefits, OPEB expense (revenue), and information about the fiduciary net position of the LRLIF and additions to/deductions from LRLIFs fiduciary net position have been determined on the same basis as they are reported by LRLIF. For this purpose, benefit payments (including refunds of employee contributions) are recognized when due and payable in accordance with the benefit terms. Investments are reported at fair value.

Deferred Outflows and Inflows of Resources - In addition to assets, the statement of net position will sometimes report a separate section for deferred outflows of resources. This separate financial statement element represents a consumption of net position that applies to future periods and will not be recognized as an outflow of resources (expenditure) until then. The District has three items that qualify for reporting in this category. They are the Wisconsin Retirement System pension, Wisconsin Retirement System local retiree life insurance fund (LRLIF), and OPEB healthcare reported in the government-wide statement of net position. The Wisconsin Retirement System pension, Wisconsin Retirement System LRLIF, and OPEB healthcare result from changes in their actuarial studies and are amortized over the average of the expected remaining service lives of participants.

In addition to liabilities, the statement of financial position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element represents an acquisition of net position which applies to future periods and so will not be recognized as an inflow of resources (revenue) until then. The District has four items that qualify for reporting in this category. They are revenue on refunding, Wisconsin Retirement System pension, Wisconsin Retirement System LRLIF, and OPEB healthcare. Revenue on refunding arises under the accrual basis of accounting. The Wisconsin Retirement System pension, Wisconsin Retirement System LRLIF, and OPEB healthcare result from changes in their actuarial studies and are amortized over the average of the expected remaining service lives of participants.

Estimates - The preparation of the financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Actual results may differ from those estimates.

NOTE 1 - Summary of Significant Accounting Policies - Continued

Net Position Classifications - Net position represents the difference between the total assets and deferred outflows of resources and the total liabilities and deferred inflows of resources. Net investment in capital assets consists of capital assets, net of accumulated depreciation, reduced by the outstanding balances of any borrowings used for the acquisition, construction or improvement for those assets. Net position is reported as restricted when there are limitations imposed on their use through external restrictions imposed by creditors, grantors or laws or regulations of other governments.

Fund Balance Classification - The District classifies its fund equity as follows: 1) nonspendable fund balance consists of equity that is not in a spendable form or is legally or contractually required to be maintained intact, 2) restricted fund balance consists of equity constrained to specific purposes by their providers, externally imposed by creditors, constitutional provisions or by enabling legislation, 3) committed fund balance consists of equity constrained to specific purposes by the District itself, using its highest level of decision making authority - Board of Education policies, 4) assigned fund balance consists of equity the governing body intends to use for a specific purpose, intent can be expressed by the governing body. The Board of Education has authorized the assistant superintendent to assign fund balances through its Fund Balance policy and 5) unassigned fund balance consists of equity available for any purpose.

When net losses occur, it is the District's policy to record the net loss against committed fund balance, then assigned fund balance and lastly to unassigned fund balance (GASB 54 default for not having a policy). The District applies restricted resources when an expense is incurred for purposes for which both restricted and unrestricted net positions are available.

NOTE 2 - Cash and Investments

State statutes permit the District to invest available cash balances, other than debt service funds, in time deposits of authorized depositories, state obligations, U.S. Treasury obligations, U.S. agency issues, repurchase agreements and other investments secured by federal securities, high grade commercial paper, and the local government investment pool administered by the state investment board. Available balances in the debt service fund may be invested in municipal obligations, obligations of the United States and the local government pooled-investment fund. No significant violations of these restrictions occurred during the year.

As of June 30, 2021, the District had the following investment:

<u>Investment</u>	<u>Weighted Average Maturities</u>	<u>Fair Value</u>
Wisconsin Investment Series Cooperative	Less than one year	\$ 12,338,049
Certificates of deposit	Less than one year	1,511,314
Certificates of deposit	More than one year	<u>2,675,193</u>
Total		<u>\$ 16,524,556</u>

Investment Pool Information - Participation in the State of Wisconsin Local Government Investment Pool is voluntary. The Pool's regulatory oversight is provided by state statutes and its investment board. The fair value of the District's position in the Pool is the same as the value of the Pool shares. At June 30, 2021, the Pool's fair value was 100 percent of book value.

NOTE 2 - Cash and Investments - Continued

Determining Fair Value - The District categorizes its fair value measurements within the fair value hierarchy established by generally accepted accounting principles. The hierarchy is based on the valuation inputs used to measure the fair value of the asset. Level 1 inputs are quoted prices in active markets; level 2 inputs are significant other observable inputs; level 3 inputs are significant unobservable inputs. The District has the following recurring fair value measurements:

- 1) State of Wisconsin Local Government Investment Pool fair value is determined monthly by the Pool's investment board based on published market quotations (level 2 inputs).
- 2) Wisconsin Investment Trust is determined based on published market quotations (level 1 inputs).

Income Allocation - Interest income is generally allocated to the fund that owns the certificate of deposit, money market account, savings account, and investment.

Interest Rate Risk - State statutes limit investments in commercial paper, corporate bonds, and mutual bond funds to those which mature or may be tendered for purchase at the option of the holder within not more than 7 years of the date acquired. The District does not have an investment policy that would further limit investment maturities as a means of further managing its exposure to fair value losses arising from increasing interest rates.

Credit Risk - State statutes limit investments in commercial paper, corporate bonds, and mutual bond funds to the top two ratings issued by nationally recognized statistical rating organizations. The District does not have an investment policy that would further limit its investment choices. The State of Wisconsin Local Government Investment Pool and Wisconsin Investment Series Cooperative are not rated.

Custodial Credit Risk - Custodial credit is the risk that, in the event of a financial institution failure, the District's deposits may not be returned. The District does not have a policy in place for custodial credit risk. The State of Wisconsin's Public Deposit Guarantee Fund created under Chapter 34 of the Wisconsin Statutes protects the municipality's designated public depositories against any losses of public funds up to \$400,000 subject to the total amount of the Guarantee Fund available. As of June 30, 2021, none of the District's bank balance of \$39,400,049 was exposed to custodial credit risk as uninsured, pledged collateral, collateralized by U.S. Government or municipal securities held by the bank in the bank's name. None was uninsured and uncollateralized.

D.C. EVEREST AREA SCHOOL DISTRICT
NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
JUNE 30, 2021

NOTE 3 - Capital Assets

Capital asset balances and activity for the year ended June 30, 2021 are as follows:

	Beginning Balance	Increases	Decreases	Ending Balance
Capital assets not being depreciated:				
Land	\$ 821,265	\$ 14,708	\$ -	\$ 835,973
Construction in progress	<u>53,499,020</u>	<u>23,694,261</u>	<u>-</u>	<u>77,193,281</u>
Total capital assets not being depreciated	<u>54,320,285</u>	<u>23,708,969</u>	<u>-</u>	<u>78,029,254</u>
Capital assets being depreciated:				
Land improvements	4,466,270	997,186	(84,043)	5,379,413
Buildings and improvements	70,725,294	1,178,492	(498,851)	71,404,935
Equipment	<u>14,275,106</u>	<u>4,434,159</u>	<u>(3,579,176)</u>	<u>15,130,089</u>
Total capital assets being depreciated	<u>89,466,670</u>	<u>6,609,837</u>	<u>(4,162,070)</u>	<u>91,914,437</u>
Less accumulated depreciation for:				
Land improvements	(2,922,816)	(196,006)	73,096	(3,045,726)
Buildings and improvements	(31,534,388)	(1,527,346)	217,153	(32,844,581)
Equipment	<u>(6,309,845)</u>	<u>(2,903,090)</u>	<u>1,527,282</u>	<u>(7,685,653)</u>
Total accumulated depreciation	<u>(40,767,049)</u>	<u>(4,626,442)</u>	<u>1,817,531</u>	<u>(43,575,960)</u>
Total capital assets being depreciated, net of accumulated depreciation	<u>48,699,621</u>	<u>1,983,395</u>	<u>(2,344,539)</u>	<u>48,338,477</u>
Capital assets, net of accumulated depreciation	<u>\$ 103,019,906</u>	<u>\$ 25,692,364</u>	<u>\$ (2,344,539)</u>	<u>\$ 126,367,731</u>

Depreciation expense was charged to governmental functions as follows:

Regular instruction	\$ 26,548
Vocational instruction	43,481
Other instruction	42,070
Pupil services	2,679
Instructional staff services	3,279
General administration services	956
Building administration services	30,148
Business services	42,333
Operations and maintenance	3,149,550
Other support services	1,228,370
Community services	<u>57,028</u>
Total	<u>\$ 4,626,442</u>

The District does not capitalize interest on general fixed asset projects.

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 4 - Short-Term Notes Payable

Line of credit used for working capital is as follows:

<u>Type</u>	<u>Beginning Balance</u>	<u>Increases</u>	<u>Decreases</u>	<u>Ending Balance</u>
Line of Credit	\$ _____ -	\$ <u>7,500,000</u>	\$ <u>(7,500,000)</u>	\$ _____ -

The District had a promissory note agreement with Incredible Bank in the amount of \$7,500,000. The agreement had an interest rate of 2.25%. The ending balance as of June 30, 2021 is \$0.

NOTE 5 - Long-Term Obligations

Long-term obligations are as follows:

	<u>Beginning Balance</u>	<u>Increases</u>	<u>Decreases</u>	<u>Ending Balance</u>	<u>Amounts Due Within One Year</u>
Bonds payable	\$ 92,710,000	\$ 5,195,000	\$ (10,095,000)	\$ 87,810,000	\$ 3,405,000
Leases - direct placement	809,372	3,179,415	(663,856)	3,324,931	588,985
Premium	3,768,782	212,929	(326,991)	3,654,720	258,652
Vested vacation pay	165,523	40,023	(165,523)	40,023	40,023
Wisconsin Retirement System					
LRLIF	3,039,023	903,108	-	3,942,131	-
OPEB healthcare	<u>3,335,223</u>	<u>1,798,886</u>	<u>(1,856,678)</u>	<u>3,277,431</u>	<u>736,097</u>
Total	<u>\$ 103,827,923</u>	<u>\$ 11,329,361</u>	<u>\$ (13,108,048)</u>	<u>\$ 102,049,236</u>	<u>\$ 5,028,757</u>

In prior years, the general and food service funds liquidated vested employee benefits. Interest cost incurred during the year totaled \$3,257,801 and total interest paid during the year aggregated \$3,608,459 including \$3,167 for short-term borrowing, and \$20,147 for capital leases.

General Obligation Debt - All general obligation debt is secured by the full faith and credit and unlimited taxing powers of the District. The general obligation debt is expected to be repaid with general property taxes. General obligation debt at June 30, 2021 is comprised of the following individual issues:

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 5 - Long-Term Obligations - Continued

<u>Issue Description</u>	<u>Issue Dates</u>	<u>Interest Rates (%)</u>	<u>Dates of Maturity</u>	<u>Balance</u>
Bonds	12/29/17	3-5%	4/1/37	\$ 24,500,000
Refunding bonds	7/2/18	3.36%	4/1/38	58,115,000
Bonds	5/12/21	2%	4/1/25	<u>5,195,000</u>
Total				<u>\$ 87,810,000</u>

General Obligation Debt Limit Calculation - The 2020 equalized valuation of the District as certified by the Wisconsin Department of Revenue is \$2,833,059,732. The legal debt limit and margin of indebtedness as of June 30, 2021, in accordance with Section 67.03(1) (b) of the Wisconsin Statutes follows:

Debt limit (10 percent of \$2,833,059,732)	\$ 283,305,973
Applicable long-term debt	(87,810,000)
Amount available in debt service fund	<u>1,992,134</u>
Margin of indebtedness	<u>\$ 197,488,107</u>

Maturities of Long-Term Obligations - Aggregate cash flow requirements for the retirement of long-term debt principal and interest are as follows:

<u>Year Ending June 30</u>	<u>Bonds</u>		<u>Leases - Direct Placement</u>		<u>Total</u>
	<u>Principal</u>	<u>Interest</u>	<u>Principal</u>	<u>Interest</u>	
2022	\$ 3,405,000	\$ 3,203,254	\$ 588,985	\$ 10,264	\$ 7,207,503
2023	3,640,000	3,091,988	746,726	4,721	7,483,435
2024	3,930,000	2,960,838	697,606	256	7,588,700
2025	4,200,000	2,816,438	680,000	-	7,696,438
2026	4,465,000	2,646,638	611,614	-	7,723,252
2027-2031	25,595,000	9,968,838	-	-	35,563,838
2032-2036	30,540,000	5,225,538	-	-	35,765,538
2037-2041	12,035,000	614,816	-	-	12,649,816
	<u>\$ 87,810,000</u>	<u>\$ 30,528,345</u>	<u>\$ 3,324,931</u>	<u>\$ 15,241</u>	<u>\$ 121,678,517</u>

Current Refunding - The District issued \$5,195,000 of refunding bonds for a current refunding of \$5,340,000 of outstanding 2012 refunding bonds. The transaction resulted in an economic gain of \$178,412 and a reduction of \$198,358 in future debt service payments.

Cash Defeasance - The District defeased \$1,310,000 of outstanding 2018 bonds by depositing \$1,511,595 with an escrow agent to reduce future debt service payments. The transaction resulted in an economic gain of \$605,693 and a reduction of \$2,117,288 in future debt service payments.

Defeased Debt - The District defeased general obligation debt by depositing money in an irrevocable trust account for future debt service payments of the old debt. Accordingly, the trust account assets and the liability for the defeased debt are not included in the District's financial statements. At June 30, 2021, there is \$1,310,000 of defeased debt remaining.

NOTE 6 - Wisconsin Retirement System

General Information about the Pension Plan

Plan Description - The WRS is a cost-sharing multiple-employer defined benefit pension plan. WRS benefits and other plan provisions are established by Chapter 40 of the Wisconsin Statutes. Benefit terms may only be modified by the legislature. The retirement system is administered by the Wisconsin Department of Employee Trust Funds (ETF). The system provides coverage to all eligible State of Wisconsin, local government and other public employees. All employees, initially employed by a participating WRS employer on or after July 1, 2011, and expected to work at least 1200 hours a year (880 hours for teachers and school district educational support employees) and expected to be employed for at least one year from employee's date of hire are eligible to participate in the WRS.

ETF issues a standalone Annual Comprehensive Financial Report (ACFR), which can be found at <http://etf.wi.gov/publications/cafr.htm>

Vesting - For employees beginning participation on or after January 1, 1990, and no longer actively employed on or after April 24, 1998, creditable service in each of five years is required for eligibility for a retirement annuity. Participants employed prior to 1990 and on or after April 24, 1998, and prior to July 1, 2011, are immediately vested. Participants who initially became WRS eligible on or after July 1, 2011 must have five years of creditable service to be vested.

Benefits Provided - Employees who retire at or after age 65 (54 for protective occupations and 62 for elected officials and executive service retirement plan participants, if hired on or before 12/31/2016) are entitled to a retirement benefit based on a formula factor, their final average earnings, and creditable service.

Final average earnings is the average of the participant's three highest annual earnings periods. Creditable service includes current service and prior service for which a participant received earnings and made contributions as required. Creditable service also includes creditable military service. The retirement benefit will be calculated as a money purchase benefit based on the employee's contributions plus matching employer's contributions, with interest, if that benefit is higher than the formula benefit.

Vested participants may retire at age 55 (50 for protective occupations) and receive an actuarial-reduced benefit. Participants terminating covered employment prior to eligibility for an annuity may either receive employee-required contributions plus interest as a separation benefit or leave contributions on deposit and defer application until eligible to receive a retirement benefit.

The WRS also provides death and disability benefits for employees.

Post-Retirement Adjustments - The Employee Trust Funds Board may periodically adjust annuity payments from the retirement system based on annual investment performance in accordance with s. 40.27, Wis. Stat. An increase (or decrease) in annuity payments may result when investment gains (losses), together with other actuarial experience factors, create a surplus (shortfall) in the reserves, as determined by the system's consulting actuary. Annuity increases are not based on cost of living or other similar factors. For Core annuities, decreases may be applied only to previously granted increases. By law, Core annuities cannot be reduced to an amount below the original, guaranteed amount (the "floor") set at retirement. The Core and Variable annuity adjustments granted during recent years are as follows:

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 6 - Wisconsin Retirement System - Continued

Year	Core Fund Adjustment	Variable Fund Adjustment
2011	(1.2)	11
2012	(7)	(7)
2013	(9.6)	9
2014	4.7	25
2015	2.9	2
2016	.5	(5)
2017	2	4
2018	2.4	17
2019	-	(10)
2020	1.7	21

Contributions - Required contributions are determined by an annual actuarial valuation in accordance with Chapter 40 of the Wisconsin Statutes. The employee required contribution is one-half of the actuarially determined contribution rate for general category employees, including teachers, and Executives and Elected Officials. Starting on January 1, 2016, the Executives and Elected Officials category was merged into the General Employee Category. Required contributions for protective employees are the same rate as general employees. Employers are required to contribute the remainder of the actuarially determined contribution rate. The employer may not pay the employee required contribution unless provided for by an existing collective bargaining agreement.

During the reporting period, the WRS recognized \$2,834,513 in contributions from the employer.

Contribution rates as of June 30, 2021 are:

Employee Category	Employee	Employer
General (including teachers, executives, and elected officials)	6.75%	6.75%
Protective with Social Security	6.75%	11.65%
Protective without Social Security	6.75%	16.25%

Pension Liabilities, Pension Expense (Revenue), Deferred Outflows of Resources, and Deferred Inflows of Resources Related to Pensions

At June 30, 2021, the District reported a liability (asset) of (\$15,429,707) for its proportionate share of the net pension liability (asset). The net pension liability (asset) was measured as of December 31, 2020, and the total pension liability used to calculate the net pension liability (asset) was determined by an actuarial valuation as of December 31, 2019, rolled forward to December 31, 2020. No material changes in assumptions or benefit terms occurred between the actuarial valuation date and the measurement date. The District's proportion of the net pension liability (asset) was based on the District's share of contributions to the pension plan relative to the contributions of all participating employers. At December 31, 2020, the District's proportion was 0.24714664%, which was a decrease of 0.00185129% from its proportion measured as of December 31, 2019.

For the year ended June 30, 2021, the District recognized pension expense of \$1,666,015.

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 6 - Wisconsin Retirement System - Continued

At June 30, 2021, the District reported deferred outflows of resources and deferred inflows of resources related to pensions from the following sources:

	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual experience	\$ 22,331,525	\$ 4,810,170
Net differences between projected and actual earnings on pension plan investments	-	28,968,019
Changes in assumptions	349,975	-
Changes in proportion and differences between employer contributions and proportionate share of contributions	41,145	8,297
Employer contributions subsequent to the measurement date	1,353,803	-
Total	\$ 24,076,448	\$ 33,786,486

\$1,353,803 reported as deferred outflows related to pension resulting from the WRS Employer's contributions subsequent to the measurement date will be recognized as a reduction of the net pension liability (asset) in the year ended June 30, 2022. Other amounts reported as deferred outflows of resources and deferred inflows of resources related to pension will be recognized in pension expense (revenue) as follows:

Year Ending June 30	Deferred Outflows and (Inflows) of Resources
2022	\$ (2,847,944)
2023	(761,923)
2024	(5,237,968)
2025	(2,216,006)
Thereafter	-

Actuarial Assumptions - The total pension liability in the December 31, 2020, actuarial valuation was determined using the following actuarial assumptions, applied to all periods included in the measurement:

Actuarial Valuation Date:	December 31, 2019
Measurement Date of Net Pension Liability (Asset)	December 31, 2020
Actuarial Cost Method:	Entry Age Normal
Asset Valuation Method:	Fair Market Value
Long-Term Expected Rate of Return:	7%
Discount Rate:	7%
Salary Increases:	
Inflation	3%
Seniority/Merit	.1% - 5.6%
Mortality:	Wisconsin 2018 Mortality Table
Post-retirement Adjustments*	1.9%

NOTE 6 - Wisconsin Retirement System - Continued

** No post-retirement adjustment is guaranteed - Actual adjustments are based on recognized investment return, actuarial experience and other factors. 1.9% is the assumed annual adjustment based on the investment return assumption and the post-retirement discount rate.*

Actuarial assumptions are based upon an experience study conducted in 2018 that covered a three-year period from January 1, 2015 to December 31, 2017. The total pension liability for December 31, 2020 is based upon a roll-forward of the liability calculated from the December 31, 2019 actuarial valuation.

Long-Term Expected Return on Plan Assets - The long-term expected rate of return on pension plan investments was determined using a building-block method in which best-estimate ranges of expected future real rates of return (expected returns, net of pension plan investment expense and inflation) are developed for each major asset class. These ranges are combined to produce the long-term expected rate of return by weighting the expected future real rates of return by the target asset allocation percentage and by adding expected inflation. The target allocation and best estimates of arithmetic real rates of return for each major asset class are summarized in the following table:

Asset Allocation Targets and Expected Returns
 As of December 31, 2020

Core Fund Asset Class	Asset Allocation %	Long-Term Expected Nominal Rate of Return %	Long-Term Expected Real Rate of Return %
Global Equities	51	7.2	4.7
Fixed Income	25	3.2	.8
Inflation Sensitive Assets	16	2	(.4)
Real Estate	8	5.6	3.1
Private Equity/Debt	11	10.2	7.6
Multi-Asset	4	5.8	3.3
Total Core Fund	115	6.6	4.1
Variable Fund Asset Class			
U.S. Equities	70	6.6	4.1
International Equities	30	7.4	4.9
Total Variable Fund	100	7.1	4.6

New England Pension Consultants Long-Term US CPI (Inflation) Forecast 2.4%

Asset Allocations are managed within established ranges, target percentages may differ from actual monthly allocations

Single Discount Rate - A single discount rate of 7% was used to measure the total pension liability for the current and prior year. This single discount rate is based on the expected rate of return on pension plan investments of 7% and a municipal bond rate of 2% (Source: Fixed-income municipal bonds with 20 years to maturity that include only federally tax-exempt municipal bonds as reported in Fidelity Index's "20-year Municipal GO AA Index" as of December 31, 2020. In describing this index, Fidelity notes that the Municipal Curves are constructed using option-adjusted analytics of a diverse population of over 10,000 tax-exempt securities.). Because of the unique structure of WRS, the 7% expected rate of return implies that a dividend of approximately 1.9% will always be paid. For purposes of the single discount

NOTE 6 - Wisconsin Retirement System - Continued

rate, it was assumed that the dividend would always be paid. The projection of cash flows used to determine this single discount rate assumed that plan member contributions will be made at the current contribution rate and that employer contributions will be made at rates equal to the difference between actuarially determined contribution rates and the member rate. Based on these assumptions, the pension plan's fiduciary net position was projected to be available to make all projected future benefit payments (including expected dividends) of current plan members. Therefore, the municipal bond rate of return on pension plan investments was applied to all periods of projected benefit payments to determine the total pension liability.

Sensitivity of the District's Proportionate Share of the Net Pension Liability (Asset) to Changes in the Discount Rate - The following presents the District's proportionate share of the net pension liability (asset) calculated using the discount rate of 7 percent, as well as what the District's proportionate share of the net pension liability (asset) would be if it were calculated using a discount rate that is 1-percentage-point lower (6 percent) or 1-percentage-point higher (8 percent) than the current rate:

	1% Decrease to Discount Rate 6%	Current Single Discount Rate Assumption 7%	1% Increase to Discount Rate 8%
District's proportionate share of the net pension liability (asset)	\$ 14,686,943	\$ (15,429,707)	\$ (37,550,163)

Pension Plan Fiduciary Net Position - Detailed information about the pension plan's fiduciary net position is available in separately issued financial statements available at <https://etf.wi.gov/about-etf/reports-and-studies/financial-reports-and-statements>.

Payables to the Pension Plan - The District reported a payable of \$769,371 for the outstanding amount of contributions to the pension plan required for the year ended June 30, 2021.

NOTE 7 - Wisconsin Retirement System Local Retirement Life Insurance Fund

General Information about the Other Post Employment Benefits

Plan Description - The LRLIF is a multiple-employer defined-benefit OPEB plan. LRLIF benefits and other plan provisions are established by Chapter 40 of the Wisconsin Statutes. The Wisconsin Department of Employee Trust Funds (ETF) and the Group Insurance Board have statutory authority for program administration and oversight. The plan provides post employment life insurance benefits for all eligible employees.

OPEB Plan Fiduciary Net Position - ETF issues a standalone Annual Comprehensive Financial Report (ACFR), which can be found at <http://etf.wi.gov/publications/cafr.htm>.

Benefits Provided - The LRLIF plan provides fully paid life insurance benefits for post age 64 retired employees and pre-65 retirees who pay for coverage.

Contributions - The Group Insurance Board approves contribution rates annually, based on recommendations from the insurance carrier. Recommended rates are based on an annual valuation, taking into consideration an estimate of the present value of future benefits and the present value of future contributions. A portion of employer contributions made during a member's working lifetime funds a post retirement benefit.

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 7 - Wisconsin Retirement System Local Retirement Life Insurance Fund - Continued

Employers are required to pay the following contributions based on employee contributions for active members to provide them with basic coverage after age 65. There are no employer contributions required for pre-age 65 annuitant coverage. If a member retires prior to age 65, they must continue paying the employee premiums until age 65 in order to be eligible for the benefit after age 65.

Contribution rates as of June 30, 2021 are:

Coverage Type	Employer Contribution
50% post retirement coverage	40% of employee contribution
25% post retirement coverage	20% of employee contribution

Employee contributions are based upon nine age bands through age 69 and an additional eight age bands for those age 70 and over. Participating employees must pay monthly contribution rates per \$1,000 of coverage until the age of 65 (age 70 if active). The employee contribution rates in effect for the year ended December 31, 2020 are as listed below:

Attained Age	Basic	Supplemental
Under 30	\$.05	\$.05
30-34	.06	.06
35-39	.07	.07
40-44	.08	.08
45-49	.12	.12
50-54	.22	.22
55-59	.39	.39
60-64	.49	.49
65-69	.57	.57
*Disabled members under age 70 receive a waiver-of-premium benefit.		

During the reporting period, the LRLIF recognized \$14,290 in contributions from the employer.

OPEB Liabilities, OPEB Expense (Revenue), Deferred Outflows of Resources, and Deferred Inflows of Resources Related to OPEBs

At June 30, 2021, the District reported a liability (asset) of \$3,942,131 for its proportionate share of the net OPEB liability (asset). The net OPEB liability (asset) was measured as of December 31, 2020, and the total OPEB liability used to calculate the net OPEB liability (asset) was determined by an actuarial valuation as of January 1, 2020 rolled forward to December 31, 2020. No material changes in assumptions or benefit terms occurred between the actuarial valuation date and the measurement date. The District's proportion of the net OPEB liability (asset) was based on the District's share of contributions to the OPEB plan relative to the contributions of all participating employers. At December 31, 2020, the District's proportion was 0.716657%, which was an increase of .002969% from its proportion measured as of December 31, 2019.

For the year ended June 30, 2021, the District recognized OPEB expense (revenue) of \$503,361.

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 7 - Wisconsin Retirement System Local Retirement Life Insurance Fund - Continued

At June 30, 2021, the District reported deferred outflows of resources and deferred inflows of resources related to OPEBs from the following sources:

	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual experience	\$ -	\$ 188,104
Net differences between projected and actual earnings on OPEB plan investments	57,394	-
Changes in assumption	1,533,545	270,483
Changes in proportion and differences between employer contributions and proportionate share of contributions	86,533	-
Employer contributions subsequent to the measurement date	-	-
Total	\$ 1,677,472	\$ 458,587

Zero reported as deferred outflows related to OPEB resulting from the LRLIF Employer's contributions subsequent to the measurement date will be recognized as a reduction of the net OPEB liability (asset) in the year ended June 30, 2022. Other amounts reported as deferred outflows of resources and deferred inflows of resources related to OPEB will be recognized in OPEB expense (revenue) as follows:

Year Ending June 30	Deferred Outflows and (Inflows) of Resources
2022	\$ 232,936
2023	226,730
2024	220,337
2025	198,589
Thereafter	340,293

Actuarial Assumptions - The total OPEB liability in the January 1, 2020 actuarial valuation was determined using the following actuarial assumptions, applied to all periods included in the measurement:

Actuarial Valuation Date:	January 1, 2020
Measurement Date of Net OPEB Liability (Asset)	December 31, 2020
Actuarial Cost Method:	Entry Age Normal
20 Year Tax Exempt Municipal Bond Yield:	2.12%
Long-Term Expected Rate of Return:	4.25%
Discount Rate:	2.25%
Salary Increases:	
Inflation	3%
Seniority/Merit	.1% - 5.6%
Mortality:	Wisconsin 2018 Mortality Table

Actuarial assumptions are based upon an experience study conducted in 2018 that covered a three-year period from January 1, 2015 to December 31, 2017. The total OPEB liability for

NOTE 7 - Wisconsin Retirement System Local Retirement Life Insurance Fund - Continued

December 31, 2020 is based upon a roll-forward of the liability calculated from the January 1, 2020 actuarial valuation.

Long-Term Expected Return on Plan Assets - The long-term expected rate of return is determined by adding expected inflation to expected long-term real returns and reflecting expected volatility and correlation. Investments for the LRLIF are held with Securian, the insurance carrier. Interest is calculated and credited to the LRLIF based on the rate of return for a segment of the insurance carriers' general fund, specifically 10-year A- Bonds (as a proxy, and not tied to any specific investments). The overall aggregate interest rate is calculated using a tiered approach based on the year the funds were originally invested and the rate of return for that year. Investment interest is credited based on the aggregate rate of return and assets are not adjusted to fair market value. Furthermore, the insurance carrier guarantees the principal amounts of the reserves, including all interest previously credited thereto.

Local OPEB Life Insurance
 Asset Allocation Targets and Expected Returns
 As of December 31, 2020

Asset Class	Index	Target Allocation %	Long-Term Expected Geometric Real Rate of Return %
US Credit Bonds	Barclays Credit	50	1.47
US Mortgages	Barclays MBS	50	.82
Inflation			2.2
Long-term Expected Rate of Return			4.25

The long-term expected rate of return and expected inflation rate remained unchanged from the prior year at 4.25% and 2.2% respectively. The long-term expected rate of return is determined by adding expected inflation to expected long-term real returns and reflecting expected volatility and correlation.

Single Discount Rate - A single discount rate of 2.25% was used to measure the total OPEB liability for the current year, as opposed to a discount rate of 2.87% for the prior year. The significant change in the discount rate was primarily caused by the decrease in the municipal bond rate from 2.74% as of December 31, 2019 to 2.12% as of December 31, 2020. The plan's fiduciary net position was projected to be insufficient to make all projected future benefit payments of current active and inactive employees. Therefore, the discount rate for calculating the total OPEB liability is equal to the single equivalent rate that results in the same actuarial present value as the long-term expected rate of return applied to benefit payments, to the extent that the plan's fiduciary net position is projected to be sufficient to make projected benefit payments, and the municipal bond rate applied to benefit payments to the extent that the plan's fiduciary net position is projected to be available to make projected future benefit payments of current plan members through December 31, 2036.

The projection of cash flows used to determine the single discount rate assumed that employer contributions will be made according to the current employer contribution schedule and that contributions are made by plan members retiring prior to age 65.

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 7 - Wisconsin Retirement System Local Retirement Life Insurance Fund - Continued

Sensitivity of the District's Proportionate Share of the Net OPEB Liability (Asset) to Changes in the Discount Rate - The following presents the District's proportionate share of the net OPEB liability (asset) calculated using the discount rate of 2.25 percent, as well as what the District's proportionate share of the net OPEB liability (asset) would be if it were calculated using a discount rate that is 1-percentage-point lower (1.25 percent) or 1-percentage-point higher (3.25 percent) than the current rate:

	1% Decrease to Discount Rate (1.25%)	Current Discount Rate (2.25%)	1% Increase to Discount Rate (3.25%)
District's proportionate share of the net OPEB liability (asset)	\$ 5,362,425	\$ 3,942,131	\$ 2,868,003

Payables to the Pension Plan - The District reported a payable of zero for the outstanding amount of contributions to the OPEB plan required for the year ended June 30, 2021.

NOTE 8 - Interfund Balance and Activity

Interfund receivable and payable balances on June 30, 2021, are as follows:

<u>Receivable Fund</u>	<u>Payable Fund</u>	<u>Amount</u>
General	Community service	\$ 57,056
Long-term capital improvement trust	General	4,000,000
Community service	General	42,389
Employee benefit trust	General	8,716
Other capital project	Food service	85,921
		<u>\$ 4,194,082</u>

The above balance resulted from the timing differences between the dates that (1) interfund goods and services are provided or reimbursable expenditures occur, (2) transactions are recorded in the accounting system and (3) payments between funds are made. All amounts are due within one year. For the statement of net position, interfund balances which are owed within the governmental activities are netted and eliminated.

Interfund transfers at June 30, 2021 were as follows:

<u>Transfer from</u>	<u>Transfer to</u>	<u>Amount</u>
General	Long-term capital improvement trust	\$ 4,000,000

Generally, transfers are used to move revenue from the fund that collects them to the fund that the budget requires to expend them and use unrestricted revenue collected in the general fund to finance various programs accounted for in other funds in accordance with budgetary authorizations.

NOTE 9 - Post Employment Benefits Other Than Pensions

General Information about the Post Employment Benefits Other Than Pensions

Plan Description - The other post employment benefits (OPEB) other than pensions is a single-employer defined benefit OPEB plan. Benefit terms are established by employee handbooks and may be modified by the Board of Education. The plan is administered by the District and included in the District's financial statements.

Benefits Provided - Current benefits apply to administrators, teachers, and support staff who retired prior to 7/1/14. Administrators receive \$60,000 allocated monthly on a pro rata basis with no maximum payment. Teachers and support staff will receive equal monthly contributions for the maximum of 7 years, or the number of eligible months left before age 65, whichever is lesser. The monthly contributions cannot exceed the total cost of insurance. Also, those retired prior to 6/9/11 will receive an additional monthly contribution of \$2,800 for family (\$1,030 for single) divided over their eligible amount. The maximum has been set for \$60,000 for family (\$22,130 for single). Administrators will also receive a contribution to cover 100% of dental costs until the age 65.

Administrators, teachers, and at will salaried employees at least age 57 with 15 years of service in the District will receive \$60,000 deposited into a HRA account if they retire prior to age 65 and are salaried. If salaried administrators retire after the age 65, they will receive \$35,000 deposited into a HRA account.

Administration confidential, custodians, food service, at will hourly, and concession employees' benefits range depending on the length of service and if the retiree retired prior to 65 or subsequent to age 65. If the retiree retired prior to age 65, they will receive \$30,000 to \$50,000 deposited into a HRA account with the service length ranging from 25 years of service to 35 years. If the retiree retired after the age 65, they will receive \$15,000 to \$25,000 deposited into a HRA account with the service length ranging from 25 years of service to 35 years.

Employees Covered - As of the June 30, 2020 measurement date, the following employees were covered by the benefit terms. The plan is closed to new entrants, with the exception of administrators.

Inactive employees or beneficiaries currently receiving benefits	12
Inactive employees entitled to but not yet receiving benefits	-
Active employees	<u>624</u>
Total	<u>636</u>

Contributions - The Board of Education has the authority to establish the contribution requirements for the plan. The Board establishes contribution rates based on premiums and an actuarially determined rate recommended by an independent actuary. The actuarially determined rate is the estimated amount necessary to finance the unfunded accrued liability. For the year ended June 30, 2021, contribution rates for Plan members were \$63 - \$330 per participant per month and \$1,932 - \$1,932 from the District, depending on the type of retiree plan. Plan members receiving benefits contributed \$23,182 and the District contributed \$736,097 to the plan.

Actuarial Assumptions - The net OPEB healthcare liability in the June 30, 2019, actuarial valuation was determined using the following actuarial assumptions, applied to all periods included in the measurement:

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 9 - Post Employment Benefits Other Than Pensions - Continued

Actuarial Valuation Date:	June 30, 2019
Measurement Date:	June 30, 2020
Actuarial Cost Method:	Entry Age Normal
Amortization Period:	20 years
Asset Valuation Method:	Fair Market Value
Long-Term Expected Rate of Return:	2.5%
Discount Rate:	2.25%
Salary Increases:	3%
Mortality:	Wisconsin 2018 Mortality Table adjusted for future mortality improvements using the MP-2018 fully generated improvement scale (multiplied 60%)
Medical Care Cost Trend:	7.5% decreasing by .5% per year down to 6.5%, then by .1% per year down to 5%, and level thereafter
Dental Care Cost Trend:	5%

The actuarial valuation was based upon the data provided by the District and utilized the premium rate history of the District's medical plans as well as the trends used in the prior valuation and projected a stream of expected premium rates for each year in the future based on the data as of June 30, 2020.

Long-Term Expected Return on Plan Assets - The long-term expected rate of return on plan investments was determined by expected future real rates of return (expected returns, net of plan investment expense and inflation) developed for each major asset class. The target allocation and best estimates of arithmetic real rates of return for each major asset class are summarized in the following table:

Asset Class	Long-Term Real Rate of Return	Target Allocation
Cash	2.0%	100%

Discount Rate - A discount rate of 2.5% was used to measure the total OPEB healthcare liability. This discount rate was based on the expected rate of return on plan investments of 2.5%. The projection of cash flows used to determine the single discount rate assumed that employer contributions will be made at rates equal to the actuarially determined contribution rates. Based on these assumptions, the plan was projected to be available to make all projected future benefit payments of current plan members. Therefore, the long-term expected rate of return on plan investments was applied to all periods of projected benefit payments to determine the total OPEB healthcare liability. The discount rate did incorporate a municipal bond rate.

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

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NOTE 9 - Post Employment Benefits Other Than Pensions - Continued

Changes in the Net OPEB Healthcare Liability

	Increase (Decrease)		
	Total OPEB Healthcare Liability	Fiduciary Net Position	Net OPEB Healthcare Liability
	(a)	(b)	(a) - (b)
Beginning balance	\$ 8,133,782	\$ 4,798,559	\$ 3,335,223
Changes for the year:			
Service cost	500,913	-	500,913
Interest	197,208	-	197,208
Differences between expected and actual experience	-	-	-
Changes of assumptions or other input	72,469	-	72,469
Contributions - employer	-	729,245	(729,245)
Net investment income	-	99,137	(99,137)
Benefit payments	(991,837)	(991,837)	-
Net changes	(221,247)	(163,455)	(57,792)
Ending balance	<u>\$ 7,912,535</u>	<u>\$ 4,635,104</u>	<u>\$ 3,277,431</u>

Sensitivity of the Net OPEB Healthcare Liability to Changes in the Healthcare Cost Trend Rate - The following presents the net OPEB healthcare liability calculated using the healthcare cost trend rate of 7.5 percent decreasing to 5 percent for all years, as well as what the net OPEB liability would be if it were calculated using a healthcare cost trend rate that is 1-percentage-point lower (6.5 percent decreasing to 4 percent for all years) or 1-percentage-point higher (8.5 percent decreasing to 6 percent for all years) than the current rate:

	1% Decrease to (6.5% decreasing to 4.0%)	Healthcare Cost Trend Rates (7.5% decreasing to 5.0%)	1% Increase to (8.5% decreasing to 6.0%)
Net OPEB healthcare liability	\$ 3,243,159	\$ 3,277,431	\$ 3,317,220

Sensitivity of the Net OPEB Healthcare Liability to Changes in the Discount Rate - The following presents the net OPEB healthcare liability calculated using the discount rate of 2.25 percent, as well as what the net OPEB healthcare liability would be if it were calculated using a discount rate that is 1-percentage-point lower (1.25 percent) or 1-percentage-point higher (3.25 percent) than the current rate:

	1% Decrease (1.25%)	Current Discount Rate (2.25%)	1% Increase (3.25%)
Net OPEB healthcare liability	\$ 3,561,241	\$ 3,277,431	\$ 2,984,770

Expense, Deferred Outflows of Resources, and Deferred Inflows of Resources Related to OPEB Healthcare

For the year ended June 30, 2021, the District recognized OPEB healthcare expense of \$630,417.

At June 30, 2021, the District reported deferred outflows of resources and deferred inflows of resources related to OPEB healthcare from the following sources:

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 9 - Post Employment Benefits Other Than Pensions - Continued

	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual experience	\$ 260,090	\$ 259,746
Changes in assumptions	66,430	867,687
Net differences between projected and actual earnings on pension plan investments	19,250	-
Employer contributions subsequent to the measurement date	736,097	-
Total	\$ 1,081,867	\$ 1,127,433

\$736,097 reported as deferred outflows related to OPEB healthcare resulting from contributions subsequent to the measurement date will be recognized as a reduction on the net OPEB healthcare liability (asset) in the year ended June 30, 2022. Other amounts reported as deferred outflows of resources and deferred inflows of resources related to OPEB healthcare will be recognized in expense as follows:

Year ending June 30	Deferred Outflows/Inflows of Resources
2022	\$ (76,084)
2023	(76,084)
2024	(76,084)
2025	(77,822)
Thereafter	\$ (475,589)

Payables to the OPEB Healthcare Plan - The District reported a payable of zero for the outstanding amount of contributions to the OPEB Healthcare plan required for the year ended June 30, 2021.

NOTE 10 - Fund Balance and Net Position

Portions of fund balances and net position are not available for current appropriation or expenditure as follows:

<u>Governmental Fund</u>	<u>Purpose</u>	<u>Amount</u>
Restricted		
General	Specific expenses	\$ 12,490
Food service	DPI regulation	\$ 1,494,216
Special revenue trust	Specific expenses	\$ 600,254
Non-referendum debt service	Principal and interest	\$ 458,150
Referendum debt service	Principal and interest	\$ 1,533,984
Long-term capital improvement trust	Specific expenses	\$ 7,595,864
Other capital projects	DPI regulation	\$ 9,779,037

D.C. EVEREST AREA SCHOOL DISTRICT
 NOTES TO THE BASIC FINANCIAL STATEMENTS - Continued
 JUNE 30, 2021

NOTE 10 - Fund Balance and Net Position - Continued

Governmental Activities

Restricted

Special revenue	DPI regulation	\$	2,047,002
Debt service	Principal and interest	\$	1,992,114
Capital projects	DPI regulation	\$	17,374,901
Other activities	Common school fund	\$	12,490
Other activities	Wisconsin Retirement System pension	\$	15,429,707

Deficits

The following fund had a deficit at June 30, 2021:

Community service	\$	47,468
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The deficit will be funded by future revenues.

The District has adopted a minimum fund balance policy with a goal of 15% of general fund expenditures to be maintained for working capital purposes.

NOTE 11 - Risk Management

The District is exposed to various risks of losses related to torts; theft of, damage to, and destruction of assets; errors and omissions; employee health and accident claims; and natural disasters. For all risks of loss, the District's policy is to purchase commercial insurance, except for self-insured dental benefits as described in Note 14. Settled claims have not exceeded commercial coverage in any of the past three years and there has been no significant reduction in insurance coverage from coverage in the prior year.

NOTE 12 - Commitments and Contingencies

The District has a service agreement with Cooperative Education Service Agency #9 for services to be provided to the District in 2021-2022. Expected costs are \$89,306.

The District has a transportation agreement with estimated costs for the following school years:

2021-2022	\$	2,590,908
2022-2023		2,649,203
2023-2024		2,708,810
2024-2025		2,769,758
		<u>\$ 10,718,679</u>

The District is aware some older buildings contain some level of asbestos in which they will incur removal costs upon remodeling, selling, or abandoning these buildings at some future date. However, at this point, the District does not feel they have enough information to reasonably estimate the fair value of the asset retirement obligation and have not recorded a liability.

NOTE 12 - Commitments and Contingencies - Continued

From time to time, the District is party to various pending claims and legal proceedings. Although the outcome of such matters cannot be forecasted with certainty, it is the opinion of management and the District's attorney that the likelihood is remote that any such claims or proceedings will have a material effect on the District's financial position or results of operations.

NOTE 13 - Limitation of School District Revenue

Wisconsin statutes limit the amount of revenue school districts may derive from general school aids and property taxes. This limitation does not apply to revenue needed for the payment of any general obligation debt service (including refinanced debt) authorized by either of the following: (a) a resolution of the school board or by a referendum prior to August 12, 1993 and (b) a referendum on or after August 12, 1993.

NOTE 14 - Self-Funded Insurance

The District established a self-funded dental benefit plan for its employees. The Plan administrators are responsible for the approval, processing, and payment of claims, after which they bill the District for reimbursement. The District is also responsible for an administrative fee. The Plan reports on a fiscal year ending June 30, 2021.

Accounting and budgeting requirements for the Plan are established by the Wisconsin Department of Public Instruction. Currently, the Plan is accounted for in the General Fund and other funds of the District.

The district has no stop-loss coverage for dental care coverage of the Plan.

The district has reported a liability of \$72,135, which represents reported and unreported claims which were incurred on or before June 30, 2021, but were not paid by the District as of that date. Changes in the claims liability for the years ended June 30, 2021 and June 30, 2020 are as follows:

	<u>Year Ended June 30, 2021</u>	<u>Year Ended June 30, 2020</u>
Beginning liability balance	\$ 165,183	\$ 166,187
Claims and changes in estimates	741,244	885,925
Claim payments	<u>(834,292)</u>	<u>(886,929)</u>
Ending liability balance	<u>\$ 72,135</u>	<u>\$ 165,183</u>

Claim payments are principally funded through charges to employees, which are paid through payroll deductions, and employer contributions to the dental plan.

The District did not receive an actuarial certification for the self-insured dental plan related to the adequacy of reserves, rates, or financial soundness of the plan.

NOTE 15 - Coronavirus (COVID-19)

The World health Organization declared the spread of COVID-19 a worldwide pandemic. The COVID-19 pandemic is having significant effects on global markets, supply chains, businesses, and communities. COVID-19 may impact various parts of the District's operations including costs for emergency preparedness, virtual school, shortages of personnel, and potential delays in revenue collections.

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

**REQUIRED
SUPPLEMENTARY INFORMATION**

D.C. EVEREST AREA SCHOOL DISTRICT
BUDGETARY COMPARISON SCHEDULE FOR THE GENERAL FUND
 BUDGET AND ACTUAL
 YEAR ENDED JUNE 30, 2021

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	ORIGINAL BUDGETED AMOUNTS			FINAL BUDGETED AMOUNTS			ACTUAL AMOUNTS			VARIANCE WITH FINAL BUDGET
	GENERAL	SPECIAL EDUCATION	TOTAL	GENERAL	SPECIAL EDUCATION	TOTAL	GENERAL	SPECIAL EDUCATION	TOTAL	POSITIVE (NEGATIVE)
REVENUES										
Property taxes	\$ 19,201,409	\$ -	\$ 19,201,409	\$ 19,201,409	\$ -	\$ 19,201,409	\$ 19,233,947	\$ -	\$ 19,233,947	\$ 32,538
Other local sources	312,128	-	312,128	312,129	-	312,129	197,415	-	197,415	(114,714)
Interdistrict sources	3,929,686	45,371	3,975,057	3,929,686	45,372	3,975,058	3,832,717	46,579	3,879,296	(95,762)
Intermediate sources	-	-	-	-	-	-	-	5,298	5,298	5,298
State sources	49,485,078	2,435,943	51,921,021	49,503,878	2,418,943	51,922,821	49,703,625	2,800,818	52,504,443	581,622
Federal sources	1,899,157	1,528,861	3,428,018	4,049,328	1,353,266	5,402,594	3,870,637	1,306,263	5,176,900	(225,694)
Other sources	242,863	-	242,863	242,863	-	242,863	428,046	11,747	439,793	196,930
TOTAL REVENUES	75,070,321	4,010,175	79,080,496	77,239,293	3,817,581	81,056,874	77,266,387	4,170,705	81,437,092	380,218
EXPENDITURES										
Current										
Instruction										
Regular instruction	32,109,938	-	32,109,938	33,756,457	-	33,756,457	33,053,786	-	33,053,786	702,671
Vocational instruction	2,075,799	-	2,075,799	2,083,012	-	2,083,012	2,057,739	-	2,057,739	25,273
Special instruction	-	8,302,250	8,302,250	-	8,124,716	8,124,716	-	8,259,797	8,259,797	(135,081)
Other instruction	4,190,110	-	4,190,110	4,263,760	-	4,263,760	3,808,006	-	3,808,006	455,754
Total instruction	38,375,847	8,302,250	46,678,097	40,103,229	8,124,716	48,227,945	38,919,531	8,259,797	47,179,328	1,048,617
Support services										
Pupil services	2,944,843	1,434,759	4,379,602	2,883,942	1,442,859	4,326,801	2,720,886	1,498,860	4,219,746	107,055
Instructional staff services	3,969,688	524,371	4,494,059	3,772,309	509,725	4,282,034	3,654,365	469,681	4,124,046	157,988
General administration services	626,107	-	626,107	1,016,006	-	1,016,006	568,061	-	568,061	447,945
Building administration services	3,169,313	-	3,169,313	3,222,866	-	3,222,866	3,267,213	-	3,267,213	(44,347)
Business services	10,865,858	648,667	11,514,525	11,041,201	648,667	11,689,868	9,247,657	548,479	9,796,136	1,893,732
Central services	882,188	10,895	893,083	915,771	10,895	926,666	896,467	1,212	897,679	28,987
Insurance	597,062	-	597,062	597,062	-	597,062	593,122	-	593,122	3,940
Other support services	1,822,002	-	1,822,002	1,823,832	-	1,823,832	1,725,069	-	1,725,069	98,763
Total support services	24,877,061	2,618,692	27,495,753	25,272,989	2,612,146	27,885,135	22,672,840	2,518,232	25,191,072	2,694,063
Non-program transactions	4,333,148	205,682	4,538,830	4,542,744	207,563	4,750,307	3,728,335	200,857	3,929,192	821,115
Debt service										
Principal	56,101	-	56,101	56,101	-	56,101	663,856	-	663,856	(607,755)
Interest	18,346	-	18,346	18,346	-	18,346	23,314	-	23,314	(4,968)
Other	5,000	-	5,000	5,000	-	5,000	2,138	-	2,138	2,862
Total debt service	79,447	-	79,447	79,447	-	79,447	689,308	-	689,308	(609,861)
Capital outlay	76,812	-	76,812	104,045	6,605	110,650	3,306,807	-	3,306,807	(3,196,157)
TOTAL EXPENDITURES	67,742,315	11,126,624	78,868,939	70,102,454	10,951,030	81,053,484	69,316,821	10,978,886	80,295,707	757,777
EXCESS (DEFICIENCY) OF REVENUES OVER EXPENDITURES	7,328,006	(7,116,449)	211,557	7,136,839	(7,133,449)	3,390	7,949,566	(6,808,181)	1,141,385	1,137,995
OTHER FINANCING SOURCES (USES)										
Transfer (to) / from other funds	(7,329,006)	7,116,449	(212,557)	(7,139,849)	7,116,449	(23,400)	(10,808,181)	6,808,181	(4,000,000)	(3,976,600)
Capital lease proceeds	-	-	-	-	-	-	3,179,415	-	3,179,415	(3,179,415)
Sale of capital assets	1,000	-	1,000	1,000	-	1,000	834,206	-	834,206	833,206
TOTAL OTHER FINANCING SOURCES (USES)	(7,328,006)	7,116,449	(211,557)	(7,138,849)	7,116,449	(22,400)	(6,794,560)	6,808,181	13,621	(6,322,809)
NET CHANGE IN FUND BALANCE	-	-	-	(2,010)	(17,000)	(19,010)	1,155,006	-	1,155,006	1,174,016
FUND BALANCE - BEGINNING OF YEAR	10,182,976	-	10,182,976	10,182,976	-	10,182,976	10,182,976	-	10,182,976	-
FUND BALANCE - END OF YEAR	\$ 10,182,976	\$ -	\$ 10,182,976	\$ 10,180,966	\$ (17,000)	\$ 10,163,966	\$ 11,337,982	\$ -	\$ 11,337,982	\$ 1,174,016

The accompanying notes are an integral part of these statements.

D.C. EVEREST AREA SCHOOL DISTRICT
NOTES TO REQUIRED SUPPLEMENTARY INFORMATION
ON BUDGETARY ACCOUNTING AND CONTROL
JUNE 30, 2021

NOTE 1 - Budgetary Information - Budgets are adopted each fiscal year for all funds in accordance with Section 65.90 of the Wisconsin Statutes, using the budgetary accounting basis prescribed by the Wisconsin Department of Public Instruction. The legally adopted budget and budgetary expenditure control is exercised at the function level. Reported budget amounts are as originally adopted or as amended by a Board of Education resolution.

The District follows these procedures in establishing the budgetary data reflected in the financial statements:

1. Based upon requests from District staff, the District Administration recommends budget proposals to the Board of Education.
2. The Board of Education prepares a proposed budget including proposed expenditures and the means of financing them for the July 1 through June 30 fiscal year.
3. A public notice is published containing a summary of the budget and identifying the time and place where a public hearing will be held on the proposed budget.
4. Pursuant to the budget hearing, the Board of Education may make alterations to the proposed budget.
5. After the Board of Education (following the public hearing) adopts the budget, no changes may be made in the amount of tax to be levied or in the amount of the various appropriations and the purposes of such appropriations unless authorized by a 2/3 vote of the entire Board of Education.
6. Appropriations lapse at year end unless authorized as a carryover by the Board of Education. The portion of fund balance representing carryover appropriations is reported as a committed or assigned fund balance.
7. Encumbrance accounting is not used.
8. Budgets are adopted on a basis consistent with generally accepted accounting principles.

NOTE 2 - Excess of Actual Expenditure Over Budget - The following expenditure classifications were in excess of \$1,000 over budget.

General/Special Education	Building administration services	\$ 44,347
General/Special Education	Principal	607,755
General/Special Education	Interest	4,968
General/Special Education	Capital outlay	3,196,157
General/Special Education	Transfer to other funds	3,976,600

D.C. EVEREST AREA SCHOOL DISTRICT
WISCONSIN RETIREMENT SYSTEM PENSION SCHEDULES
YEAR ENDED JUNE 30, 2021

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SCHEDULE OF PROPORTIONATE SHARE OF THE NET PENSION LIABILITY (ASSET)
 Last 10 Fiscal Years *

	Proportion of the Net Pension Liability (Asset)	Proportionate Share of the Net Pension Liability (Asset)	Covered Payroll	Proportionate Share of the Net Pension Liability (Asset) as a Percentage of its Covered Payroll	Plan Fiduciary Net Position as a Percentage of the Total Pension Liability (Asset)
2021	0.24714664%	\$ (15,429,707)	\$41,992,788	-36.74%	105.26%
2020	0.24529535%	(7,909,441)	39,227,989	-20.16%	102.96%
2019	0.24584725%	8,746,474	37,596,290	23.26%	96.45%
2018	0.24755213%	(7,350,116)	36,582,096	-20.09%	102.93%
2017	0.24666233%	2,033,087	35,668,105	5.70%	99.12%
2016	0.24736995%	4,019,714	35,465,311	11.33%	98.20%
2015	0.24827742%	(6,098,373)	34,105,812	-17.88%	102.74%

SCHEDULE OF CONTRIBUTIONS
 Last 10 Fiscal Years *

	Contractually Required Contributions	Contributions in Relation to the Contractually Required Contributions	Contribution Deficiency (Excess)	Covered Payroll	Contributions as a Percentage of Covered Payroll
2021	\$ 2,834,513	\$ (2,834,513)	\$ -	\$ 41,992,788	6.75%
2020	2,569,444	(2,569,444)	-	39,227,989	6.55%
2019	2,518,951	(2,518,951)	-	37,596,290	6.70%
2018	2,487,690	(2,487,690)	-	36,582,096	6.80%
2017	2,353,922	(2,353,922)	-	35,668,105	6.60%
2016	2,411,641	(2,411,641)	-	35,465,311	6.80%
2015	2,387,402	(2,387,402)	-	34,105,812	7.00%

* The amounts presented for each fiscal year were determined as of the calendar year end which occurred within the fiscal year.

The District implemented the Government Accounting Standards Board Statement No. 68 for the year ended June 30, 2015. Requirements have been implemented prospectively; therefore, the above illustrations do not reflect similar information for the 3 preceding years.

Notes to Required Supplementary Information for the Year Ended June 30, 2021

Changes of benefit terms - there were no changes of benefit terms for any participating employer in WRS.

Changes of assumptions - no significant change in assumptions from the prior year were noted.

D.C. EVEREST AREA SCHOOL DISTRICT
 WISCONSIN RETIREMENT SYSTEM LOCAL RETIREE LIFE INSURANCE FUND SCHEDULES 231
 YEAR ENDED JUNE 30, 2021

SCHEDULE OF PROPORTIONATE SHARE OF THE NET OPEB LIABILITY (ASSET)
 Last 10 Fiscal Years *

	Proportion of the Net OPEB Liability (Asset)	Proportionate Share of the Net OPEB Liability (Asset)	Covered Payroll	Proportionate Share of the Net OPEB Liability (Asset) as a Percentage of its Covered Payroll	Plan Fiduciary Net Position as a Percentage of the Total OPEB Liability (Asset)
2021	0.71665700%	\$ 3,942,131	\$38,400,000	10.27%	31.36%
2020	0.71368800%	3,039,023	38,076,000	7.98%	37.58%
2019	0.70300300%	1,813,985	36,844,000	4.92%	48.69%
2018	0.67954400%	2,044,463	28,576,769	7.15%	44.81%

SCHEDULE OF CONTRIBUTIONS
 Last 10 Fiscal Years *

	Contractually Required Contributions	Contributions in Relation to the Contractually Required Contributions	Contribution Deficiency (Excess)	Covered Payroll	Contributions as a Percentage of Covered Payroll
2021	\$ 14,290	\$ (14,290)	\$ -	\$ 38,400,000	0.04%
2020	12,901	(12,901)	-	38,076,000	0.03%
2019	13,544	(13,544)	-	36,844,000	0.04%
2018	12,904	(12,904)	-	28,576,769	0.05%

* The amounts presented for each fiscal year were determined as of the calendar year end which occurred within the fiscal year.

The District implemented the Government Accounting Standards Board Statement No. 75 for the year ended June 30, 2018. Requirements have been implemented prospectively; therefore, the above illustrations do not reflect similar information for the 6 proceeding years.

Notes to Required Supplementary Information for the Year Ended June 30, 2021

Changes of benefit terms - there were no changes of benefit terms for any participating employer in LRLIF.

Changes of assumptions - *The Single Discount Rate* assumption used to develop Total OPEB Liability changed from the prior year. Please refer to the Actuarial Assumptions section above for additional detail.

D.C. EVEREST AREA SCHOOL DISTRICT
OPEB HEALTHCARE DEFINED BENEFIT PLAN SCHEDULES
YEAR ENDED JUNE 30, 2021

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SCHEDULE OF CHANGES IN THE NET OPEB HEALTHCARE LIABILITY AND RELATED RATIOS
Last 10 Fiscal Years

	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>
Total OPEB Healthcare Liability				
Service cost	\$ 500,913	\$ 600,917	\$ 547,618	\$ 518,700
Interest	197,208	235,703	242,459	240,570
Differences between expected and actual experience	-	(303,085)	310,890	(9,407)
Changes of assumptions or other input	72,469	(1,041,225)	-	-
Benefit payments	<u>(991,837)</u>	<u>(972,383)</u>	<u>(964,793)</u>	<u>(752,556)</u>
Net Changes in Total OPEB Healthcare Liability	(221,247)	(1,480,073)	136,174	(2,693)
Total OPEB Healthcare Liability - Beginning	<u>8,133,782</u>	<u>9,613,855</u>	<u>9,477,681</u>	<u>9,480,374</u>
Total OPEB Healthcare Liability - Ending (a)	<u>\$ 7,912,535</u>	<u>\$ 8,133,782</u>	<u>\$ 9,613,855</u>	<u>\$ 9,477,681</u>
Plan Fiduciary Net Position				
Contributions - employer	\$ 729,245	\$ 729,900	\$ 850,781	\$ 828,676
Contributions - employee	-	-	68,658	120,785
Net investment income	99,137	96,978	94,243	(44,272)
Benefit payments	<u>(991,837)</u>	<u>(972,383)</u>	<u>(964,793)</u>	<u>(752,556)</u>
Net Changes in Plan Fiduciary Net Position	(163,455)	(145,505)	48,889	152,633
Plan Fiduciary Net Position - Beginning	<u>4,798,559</u>	<u>4,944,064</u>	<u>4,895,175</u>	<u>4,742,542</u>
Plan Fiduciary Net Position - Ending (b)	<u>\$ 4,635,104</u>	<u>\$ 4,798,559</u>	<u>\$ 4,944,064</u>	<u>\$ 4,895,175</u>
Net OPEB Healthcare Liability - Ending (a) - (b)	<u>\$ 3,277,431</u>	<u>\$ 3,335,223</u>	<u>\$ 4,669,791</u>	<u>\$ 4,582,506</u>
Plan fiduciary net position as a percentage of the total OPEB Healthcare Liability	58.58%	59.00%	51.43%	51.65%
Covered payroll	\$39,061,710	\$39,061,710	\$27,924,743	\$ 28,347,731
Net OPEB Healthcare Liability as a percentage of covered payroll	8.39%	8.54%	16.72%	16.17%

SCHEDULE OF CONTRIBUTIONS
Last 10 Fiscal Years

	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>
Actuarially determined contributions	\$ 736,097	\$ 709,992	\$ 709,992	\$ 803,542
Contributions in relation to the actuarially determined contributions	<u>(729,245)</u>	<u>(729,900)</u>	<u>(850,781)</u>	<u>(828,676)</u>
Contribution deficiency (excess)	<u>\$ 6,852</u>	<u>\$ (19,908)</u>	<u>\$ (140,789)</u>	<u>\$ (25,134)</u>
Covered payroll	\$39,061,710	\$39,061,710	\$27,924,743	\$ 28,347,731
Contributions as a percentage of covered payroll	1.87%	1.87%	3.05%	2.92%
Actuarial valuation date	6/30/2019	6/30/2019	6/30/2018	6/30/2017
Measurement date	6/30/2020	6/30/2019	6/30/2018	6/30/2017

The District implemented the Government Accounting Standards Board Statement No. 75 for the year ended June 30, 2018. Requirements have been implemented prospectively; therefore, the above illustrations do not reflect similar information for the 6 preceding years.

Notes to Required Supplementary Information for the Year Ended June 30, 2021

Methods and assumptions used to determine actuarial calculations - entry age normal cost, 20 year amortization, fair market value asset valuation, 2.25% discount rate, 3% salary increases, Wisconsin 2018 Mortality Table adjusted for future mortality improvements using the MP-2018 fully generated improvement scale (multiplied 60%).

Changes of benefit terms - there were no changes of benefit terms.

Changes of assumptions - there were no changes in the assumptions.

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

SUPPLEMENTARY INFORMATION

D.C. EVEREST AREA SCHOOL DISTRICT
 COMBINING BALANCE SHEETS
 NONMAJOR GOVERNMENTAL FUNDS
 JUNE 30, 2021

	21	50	80	38	46	
	SPECIAL REVENUE FUNDS			DEBT SERVICE FUND	LONG-TERM CAPITAL IMPROVEMENT TRUST	TOTAL NONMAJOR GOVERNMENTAL FUNDS
	TRUST	FOOD SERVICE	COMMUNITY SERVICE	NON-REFERENDUM		
ASSETS						
Cash and investments	\$ 612,121	\$ 1,655,300	\$ -	\$ 458,150	\$ 3,595,864	\$ 6,321,435
Receivables						
Accounts	-	82	127,224	-	-	127,306
Due from other funds	-	-	42,389	-	4,000,000	4,042,389
Due from other governments	-	115,013	1,804	-	-	116,817
TOTAL ASSETS	612,121	1,770,395	171,417	458,150	7,595,864	10,607,947
LIABILITIES						
Accounts payable	11,867	42,379	37,372	-	-	91,618
Accrued payroll liabilities	-	25,496	51,122	-	-	76,618
Due to other funds	-	85,921	57,056	-	-	142,977
Unearned revenue	-	122,383	73,335	-	-	195,718
TOTAL LIABILITIES	11,867	276,179	218,885	-	-	506,931
FUND BALANCES						
Restricted	600,254	1,494,216	(47,468)	458,150	7,595,864	10,101,016
TOTAL FUND BALANCES	600,254	1,494,216	(47,468)	458,150	7,595,864	10,101,016
TOTAL LIABILITIES AND FUND BALANCES	\$ 612,121	\$ 1,770,395	\$ 171,417	\$ 458,150	\$ 7,595,864	\$ 10,607,947

D.C. EVEREST AREA SCHOOL DISTRICT

COMBINING STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES
NONMAJOR GOVERNMENTAL FUNDS
YEAR ENDED JUNE 30, 2021

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	21	50	80	38	46	TOTAL NONMAJOR GOVERNMENTAL FUNDS
	SPECIAL REVENUE FUNDS			DEBT SERVICE FUND	LONG-TERM CAPITAL IMPROVEMENT TRUST	
	TRUST	FOOD SERVICE	COMMUNITY SERVICE	NON-REFERENDUM		
REVENUES						
Property taxes	\$ -	\$ -	\$ 250,000	\$ 1,394,523	\$ -	\$ 1,644,523
Other local sources	491,610	216,939	704,506	-	17,606	1,430,661
State sources	-	52,843	-	-	-	52,843
Federal sources	-	2,688,578	-	-	-	2,688,578
Other sources	-	-	43,759	-	-	43,759
TOTAL REVENUES	<u>491,610</u>	<u>2,958,360</u>	<u>998,265</u>	<u>1,394,523</u>	<u>17,606</u>	<u>5,860,364</u>
EXPENDITURES						
Current						
Instruction						
Regular instruction	436,207	-	-	-	-	436,207
Other instruction	121,209	-	-	-	-	121,209
Total instruction	<u>557,416</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>557,416</u>
Support service						
Business services	-	2,451,774	284,172	-	364,862	3,100,808
Central services	-	-	76	-	-	76
Community services	-	-	867,036	-	-	867,036
Total support services	<u>-</u>	<u>2,451,774</u>	<u>1,151,284</u>	<u>-</u>	<u>364,862</u>	<u>3,967,920</u>
Non-program transactions	<u>-</u>	<u>-</u>	<u>1,627</u>	<u>-</u>	<u>-</u>	<u>1,627</u>
Debt service						
Principal	-	-	-	500,000	-	500,000
Interest	-	-	-	911,300	-	911,300
Total debt service	<u>-</u>	<u>-</u>	<u>-</u>	<u>1,411,300</u>	<u>-</u>	<u>1,411,300</u>
Capital outlay	<u>-</u>	<u>134,262</u>	<u>744</u>	<u>-</u>	<u>-</u>	<u>135,006</u>
TOTAL EXPENDITURES	<u>557,416</u>	<u>2,586,036</u>	<u>1,153,655</u>	<u>1,411,300</u>	<u>364,862</u>	<u>6,073,269</u>
EXCESS (DEFICIENCY) OF REVENUES OVER EXPENDITURES	<u>(65,806)</u>	<u>372,324</u>	<u>(155,390)</u>	<u>(16,777)</u>	<u>(347,256)</u>	<u>(212,905)</u>
OTHER FINANCING SOURCES						
Transfer from other funds	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>4,000,000</u>	<u>4,000,000</u>
NET CHANGE IN FUND BALANCE	<u>(65,806)</u>	<u>372,324</u>	<u>(155,390)</u>	<u>(16,777)</u>	<u>3,652,744</u>	<u>3,787,095</u>
FUND BALANCES - BEGINNING OF YEAR	<u>666,060</u>	<u>1,121,892</u>	<u>107,922</u>	<u>474,927</u>	<u>3,943,120</u>	<u>6,313,921</u>
FUND BALANCES - END OF YEAR	<u>\$ 600,254</u>	<u>\$ 1,494,216</u>	<u>\$ (47,468)</u>	<u>\$ 458,150</u>	<u>\$ 7,595,864</u>	<u>\$ 10,101,016</u>

D.C. EVEREST AREA SCHOOL DISTRICT
SCHEDULE OF CHARTER SCHOOL AUTHORIZER OPERATING COSTS
YEAR ENDED JUNE 30, 2021

OPERATING ACTIVITY	WUFAR OBJECT CODE	COST
Employee salary	100	\$ -
Employee benefits	200	-
Purchased services	300	-
Non-capital objects	400	-
Capital objects	500	-
Lease payments	600	-
Insurance and judgements	700	-
Special education costs	800	-
Other objects	900	-
Total		<u>\$ -</u>

D.C. EVEREST AREA SCHOOL DISTRICT
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED JUNE 30, 2021

Awarding Agency Pass-Through Agency Award Description	PASS-THROUGH ENTITY IDENTIFYING NUMBER	ASSISTANCE LISTING NUMBER	PROGRAM OR AWARD AMOUNT	ACCRUED		EXPENDITURES	ACCRUED		SUBRECIPIENT PASS-THROUGH EXPENDITURES
				RECEIVABLE (UNEARNED REVENUE) JULY 1, 2020	REVENUES GRANTOR REIMBURSE- MENTS		RECEIVABLE (UNEARNED REVENUE) JUNE 30, 2021	REVENUES	
U.S. DEPARTMENT OF AGRICULTURE									
Wisconsin Department of Public Instruction									
Child Nutrition Cluster									
Food Distribution									
July 1, 2020 - June 30, 2021	None	10.555	N/A	\$ -	\$ 225,497	\$ 225,497	\$ -	\$ -	-
COVID-19 - Summer Food Service Program for Children									
July 1, 2019 - June 30, 2020	2020-374970-DPI-SFSP-586	10.559	N/A	75,441	75,441	-	-	-	-
July 1, 2020 - June 30, 2021	2021-374970-DPI-SFSP-586		N/A	-	2,260,432	2,374,042	113,610	-	-
Total Child Nutrition Cluster				75,441	2,561,370	2,599,539	113,610	-	-
Team Nutrition Subgrant									
July 1, 2020 - June 30, 2021	None	10.574	\$ 1,000	-	1,000	1,000	-	-	-
COVID-19 - Child & Adult Care Food Program									
July 1, 2020 - June 30, 2021	2021-374970-DPI-AR-551	10.558	N/A	-	13,289	13,514	225	-	-
TOTAL U.S. DEPARTMENT OF AGRICULTURE				75,441	2,575,659	2,614,053	113,835	-	-
U.S. DEPARTMENT OF EDUCATION									
Wisconsin Department of Public Instruction									
Special Education Cluster									
Special Education - Grants to States (IDEA Part B) - CEIS									
July 1, 2020 - June 30, 2021	2021-374970-DPI-IDEA-FT-341	84.027A		175,595	-	37,234	99,816	62,582	-
Special Education - Grants to States (IDEA Part B)									
July 1, 2019 - June 30, 2020	2020-374970-DPI-IDEA-F-341	84.027A	N/A	234,399	234,399	-	-	-	-
July 1, 2020 - June 30, 2021	2021-374971-DPI-IDEA-FT-341		\$ 984,311	-	367,452	919,028	551,576	-	-
Special Education - Preschool Grants (IDEA Part B)									
July 1, 2019 - June 30, 2020	2020-374970-DPI-IDEA-P-347	84.173A	N/A	14,068	14,068	-	-	-	-
July 1, 2020 - June 30, 2021	2021-374970-DPI-IDEA-P-347		36,226	-	-	28,226	28,226	-	-
Total Special Education Cluster				248,467	653,153	1,047,070	642,384	-	-
Title IA - Grants to Local Educational Agencies									
July 1, 2019 - June 30, 2020	2020-374970-TIA-141	84.010A	N/A	202,356	202,356	-	-	-	-
July 1, 2020 - June 30, 2021	2021-374970-DPI-TIA-141		668,733	-	-	631,601	631,601	-	-
Title IV-A - Student Support and Academic Enrichment									
July 1, 2019 - June 30, 2020	2020-374970-DPI-TIVA-381	84.424A	N/A	6,142	6,142	-	-	-	-
July 1, 2020 - June 30, 2021	2021-374970-DPI-TIVA-381		78,717	-	11,461	40,752	29,291	-	-
Title IV - 21st Century Learners									
July 1, 2019 - June 30, 2020	2020-374970-CLC DPI-367	84.287	N/A	15,136	15,136	-	-	-	-
July 1, 2020 - June 30, 2021	2021-37497-DPI-CLC-367		125,000	-	-	107,917	107,917	-	-
Title III-A - English Language Acquisition Grants									
July 1, 2019 - June 30, 2020	202374970-DPI-T3-391	84.365A	N/A	18,877	18,877	-	-	-	-
July 1, 2020 - June 30, 2021	2021-374970-DPI-TIII-391		90,410	-	-	52,226	52,226	-	-
Carl Perkins Act Formula Allocation Grant (Carl Perkins)									
July 1, 2019 - June 30, 2020	2020-374970-CTE-400	84.048	N/A	28,349	28,349	-	-	-	-
July 1, 2020 - June 30, 2021	2021-374970-DPI-CTE-400		48,446	-	-	25,582	25,582	-	-
Title II-A - Teacher/Principal Training									
July 1, 2019 - June 30, 2020	2020-374970-DPI-TIIA-365	84.367A	N/A	62,283	62,283	-	-	-	-
July 1, 2020 - June 30, 2021	2021-374970-DPI-TIIA-365		147,024	-	-	112,593	112,593	-	-
Education Stabilization Fund									
Elementary and Secondary Schools Emergency Relief Fund									
July 1, 2020 - June 30, 2021	2021-374970-DPI-ESSERF-160	84.425D		549,040	-	530,137	530,137	-	-
Elementary and Secondary Schools Emergency Relief Fund									
July 1, 2020 - June 30, 2021	2021-374970-DPI-ESSERF-163	84.425D		2,058,683	-	2,070,919	2,067,897	(3,022)	-
Total Education Stabilization Fund				-	2,601,056	2,598,034	(3,022)	-	-
TOTAL U.S. DEPARTMENT OF EDUCATION				581,610	3,598,813	4,615,775	1,598,572	-	-
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES									
Wisconsin Department of Health Services									
Medical Assistance Cluster									
July 1, 2020 - June 30, 2021	None	93.778	N/A	-	610,415	635,648	25,233	-	-
Total Medical Assistance Cluster									
TOTAL U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES									
				-	610,415	635,648	25,233	-	-
TOTAL FEDERAL AWARDS				\$ 657,051	\$ 6,784,887	\$ 7,865,476	\$ 1,737,640	\$ -	\$ -

D.C. EVEREST AREA SCHOOL DISTRICT
SCHEDULE OF STATE FINANCIAL ASSISTANCE
YEAR ENDED JUNE 30, 2021

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AWARDING AGENCY PASS-THROUGH AGENCY AWARD DESCRIPTION	PASS-THROUGH		RECEIVABLE			RECEIVABLE		SUBRECIPIENT PASS-THROUGH EXPENDITURES
	ENTITY IDENTIFYING NUMBER	STATE I.D. NUMBER	(UNEARNED REVENUE) JULY 1, 2020	REVENUE		(UNEARNED REVENUE) JUNE 30, 2021		
				GRANTOR REIMBURSEMENTS	EXPENDITURES			
WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION								
Wisconsin Department of Public Instruction								
Special Education and School Age Parents	347970-100	255.101	\$ -	\$ 2,675,307	\$ 2,675,307	\$ -	\$ -	-
State School Lunch Aid	374970-107	255.102	-	26,854	26,854	-	-	-
Common School Fund Library Aid	374970-104	255.103	-	259,880	259,880	-	-	-
Bilingual/Bicultural Aid	374970-111	255.106	-	89,989	89,989	-	-	-
General Transportation Aid	374970-102	255.107	-	262,621	262,621	-	-	-
Wisconsin School Day Milk Program	374970-109	255.115	-	17,804	17,804	-	-	-
General Aids Cluster								
Equalization Aid	374970-116	255.201	679,857	44,109,722	44,103,967	674,102	-	-
High Cost Special Education Aid	374970-119	255.210	-	111,793	111,793	-	-	-
Aid for School Mental Health Programs	374970-176	255.227	-	120,814	138,655	17,841	-	-
Supplemental Per Pupil Aid	374970-181	255.245	-	17,720	17,720	-	-	-
Trauma Sensitive Schools Grant	374970-177	255.297	33,730	33,730	73,447	73,447	-	-
Alcohol and Other Drug Abuse	374970-143	255.306 / 255.321	8,776	8,776	13,976	13,976	-	-
School Breakfast Program	374970-108	255.344	-	8,185	8,185	-	-	-
Early College Credit Program	374970-178	255.445	-	173	173	-	-	-
Educator Effectiveness Evaluation System	374970-154	255.940	-	-	37,322	37,322	-	-
Per Pupil Aid	374970-113	255.945	-	4,326,602	4,326,602	-	-	-
Career and Technical Education Incentive	374970-152	255.950	-	42,275	42,275	-	-	-
Assessments of Reading Readiness	374970-166	255.956	-	7,024	7,024	-	-	-
Aid for Special Education Transition	374970-168	255.960	-	35,000	35,000	-	-	-
TOTAL WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION			<u>722,363</u>	<u>52,154,269</u>	<u>52,248,594</u>	<u>816,688</u>		
WISCONSIN DEPARTMENT OF NATURAL RESOURCES								
Payment in Lieu of Taxes	None	None	-	26,980	26,980	-	-	-
WISCONSIN DEPARTMENT OF REVENUE								
Exempt Computer Aid	None	None	128,616	128,616	128,616	128,616	-	-
Exempt Personal Property Aid	None	255.301	-	130,414	130,414	-	-	-
TOTAL WISCONSIN DEPARTMENT OF REVENUE			<u>128,616</u>	<u>259,030</u>	<u>259,030</u>	<u>128,616</u>		
WISCONSIN DEPARTMENT OF WORKFORCE DEVELOPMENT								
Wisconsin Fast Forward Teacher Training and Development Grant	None	445.109	(425)	33,676	34,101	-	-	-
TOTAL STATE FINANCIAL ASSISTANCE			<u>\$ 850,554</u>	<u>\$ 52,473,955</u>	<u>\$ 52,568,705</u>	<u>\$ 945,304</u>	<u>\$ -</u>	

The accompanying notes are an integral part of these statements.

D.C. EVEREST AREA SCHOOL DISTRICT
NOTES TO THE SCHEDULE OF EXPENDITURES OF
FEDERAL AWARDS AND STATE FINANCIAL ASSISTANCE
JUNE 30, 2021

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NOTE 1 - Basis of Presentation

The accompanying schedules of expenditures of federal awards and state financial assistance include the federal and state grant activity of the D.C. Everest Area School District. The information in these schedules is presented in accordance with the requirements of Uniform Guidance and *State Single Audit Guidelines*. Therefore, some amounts presented in these schedules may differ from amounts presented in or used in the preparation of the financial statements.

NOTE 2 - Summary of Significant Accounting Policies

Expenditures reported on the schedules are reported on the modified accrual basis of accounting. Such expenditures are recognized following the cost principles contained in Uniform Guidance, wherein certain types of expenditures are not allowable and are limited as to reimbursement.

NOTE 3 - Special Education and School Age Parents Program

2020-2021 eligible costs under the State Special Education Program are \$9,784,295.

NOTE 4 - Food Distribution Program

Non-monetary assistance is reported in the schedule of federal awards at the fair market value of the commodities received and used.

NOTE 5 - 10% De Minimis Cost Rate

Elected not to use.

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

OTHER REPORTS



**INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN
ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS**

To the Board of Education
D.C. Everest Area School District
Schofield, Wisconsin

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the D.C. Everest Area School District, as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the D.C. Everest Area School District's basic financial statements and have issued our report thereon dated November 1, 2021.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the D.C. Everest Area School District's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the D.C. Everest Area School District's internal control. Accordingly, we do not express an opinion on the effectiveness of the D.C. Everest Area School District's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. *A material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. *A significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We did identify a certain deficiency in internal control, described in the accompanying schedule of findings and questioned costs that we consider to be a significant deficiency. We consider the 2021-001 deficiency described in the accompanying schedule of findings and questioned costs to be a significant deficiency.

As part of obtaining reasonable assurance about whether the D.C. Everest Area School District's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

D.C. Everest Area School District's Response to Finding

D.C. Everest Area School District's response to the finding identified in our audit is described in the accompanying schedule of findings and questioned costs. D.C. Everest Area School District's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

HAWKINS ASH CPAS, LLP



Manitowoc, Wisconsin
November 1, 2021



INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED BY THE UNIFORM GUIDANCE AND STATE SINGLE AUDIT GUIDELINES

To the Board of Education
D.C. Everest Area School District
Schofield, Wisconsin

Report on Compliance for Each Major Federal and State Program

We have audited the D.C. Everest Area School District's compliance with the types of compliance requirements described in the *OMB Compliance Supplement* and *State Single Audit Guidelines* that could have a direct and material effect on each of the D.C. Everest Area School District's major federal and state programs for the year ended June 30, 2021. The D.C. Everest Area School District's major federal and state programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with federal and state statutes, regulations, and the terms and conditions of its federal and state awards applicable to its federal and state programs.

Auditors' Responsibility

Our responsibility is to express an opinion on compliance for each of the District's major federal and state programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance) and the *State Single Audit Guidelines* issued by the Wisconsin Department of Administration. Those standards, the Uniform Guidance and state guidelines require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal or state program occurred. An audit includes examining, on a test basis, evidence about the District's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal and state program. However, our audit does not provide a legal determination of the D.C. Everest Area School District's compliance.

In our opinion, the D.C. Everest Area School District complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal and state programs for the year ended June 30, 2021.

Report on Internal Control over Compliance

Management of the D.C. Everest Area School District is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the D.C. Everest Area School District's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal or state program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each federal and state program and to test and report on internal control over compliance in accordance with Uniform Guidance and *State Single Audit Guidelines*, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the D.C. Everest Area School District's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal or state program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal or state program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal and state program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of Uniform Guidance and *State Single Audit Guidelines*. Accordingly, this report is not suitable for any other purpose.

HAWKINS ASH CPAS, LLP



Manitowoc, Wisconsin
November 1, 2021

D.C. EVEREST AREA SCHOOL DISTRICT
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
 JUNE 30, 2021

Section I - Summary of Auditors' Results

Financial Statements

Type of auditors' report issued: Unmodified

Internal control over financial reporting:

Material weakness identified?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Significant deficiency(ies) identified not considered to be material weaknesses?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> None reported
Noncompliance material to the financial statements?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Federal Awards

Internal control over financial reporting:

Material weakness identified?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Significant deficiency(ies) identified not considered to be material weaknesses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> None reported

Type of auditors' report issued on compliance for major programs: Unmodified

Any audit findings disclosed that are required to be reported in accordance with Uniform Guidance?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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Identification of major federal programs:

<u>Assistance Listing Number</u>	<u>Name of Federal Program or Cluster</u>
93.778	Medical Assistance
84.425	ESSER

State Assistance

Internal control over financial reporting:

Material weakness identified?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Significant deficiency(ies) identified not considered to be material weaknesses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> None reported

Type of auditors' report issued on compliance for major programs: Unmodified

Any audit findings disclosed that are required to be reported in accordance with *State Single Audit Guidelines*?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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D.C. EVEREST AREA SCHOOL DISTRICT
 SCHEDULE OF FINDINGS AND QUESTIONED COSTS - Continued
 JUNE 30, 2021

Identification of major state programs:

<u>State ID Number</u>	<u>Name of State Program or Cluster</u>
255.101	Special Education
255.107	General Transportation Aid
255.201	Equalization Aid
255.945	Per Pupil Aid

Dollar threshold used to distinguish between:

Type A and Type B federal programs:	\$750,000
Type A and Type B state programs:	\$250,000

Auditee qualified as low-risk auditee? X Yes No

Section II - Financial Statement Findings and Questioned Costs

2021-001 - Preparation of Financial Statements

Program: District-Wide

Criteria: Adequate internal controls necessitate personnel to have knowledge and training which would enable them to prepare financial statements (and footnotes) in accordance with generally accepted accounting principles (GAAP).

Condition: Personnel cannot prepare GAAP basis financial statements.

Questioned Costs: Not applicable.

Context: Personnel have adequate knowledge and experience in governmental accounting and interim reporting requirements; however, their limited knowledge and lack of training limits their ability to prepare GAAP basis financial statements.

Effect: This weakness could result in the possibility of undetected errors and irregularities.

Information: Isolated instance.

Prior Year Finding: This was a prior year audit finding numbered 2020-001.

Recommendation: Obtain adequate training or continue to hire a certified public accounting (CPA) firm to prepare GAAP basis financial statements.

Management's Response: Due to the complexities involved with preparing GAAP basis financial statements, management has weighed the cost-benefit of training personnel or hiring a CPA firm. Management has concluded to hire a CPA firm.

Section III - Federal and State Award Findings and Questioned Costs

None



D.C. Everest Area School District

1699 Schofield Ave., Suite 300
Schofield, WI 54476
Phone 715-359-4221

Kristine A. Gilmore, Ed.D.
Superintendent

MISSION STATEMENT

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D.C. Everest Area School District, in partnership with the community, is committed to being an innovative educational leader in developing knowledgeable, productive, caring, creative, responsible individuals prepared to meet the challenges of an ever-changing global society.

SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS AND CORRECTIVE ACTION PLAN
JUNE 30, 2021

Summary Schedule of Prior Audit Findings

2020-001 - Preparation of Financial Statements - Repeat. Initially occurred 6/30/13.

Corrective Action Plan

2021-001 - Preparation of Financial Statements - Contact: Emily Seehafer, Director of Finance. Completion date: N/A. Due to the complexities of governmental reporting in accordance with GAAP, i.e. financial statements and related disclosure reporting, District management has weighed the cost benefit of training current staff or hiring a Certified Public Accountant on staff for the purposes of preparing the external financial statements in accordance with GAAP. District management has concluded to outsource the preparation of the external financial statements and related disclosures to their certified public accounting firm, which is an acceptable practice according to *Government Auditing Standards*. District management will review and approve the externally prepared financial statements.

**D.C. EVEREST AREA SCHOOL DISTRICT
SCHOFIELD, WISCONSIN**

**INDEPENDENT AUDITORS' REPORT ON COMMUNICATION
WITH THOSE CHARGED WITH GOVERNANCE
AND MANAGEMENT ADVISORY COMMENTS**

JUNE 30, 2021

D.C. EVEREST AREA SCHOOL DISTRICT
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Appendix B	Management Representation Letter



INDEPENDENT AUDITORS' REPORT ON COMMUNICATION WITH THOSE CHARGED WITH GOVERNANCE

To the Board of Education
D.C. Everest Area School District
Schofield, Wisconsin

We have audited the financial statements of the D.C. Everest Area School District as of and for the year ended June 30, 2021, and have issued our report thereon dated November 1, 2021. Professional standards require that we advise you of the following matters relating to our audit.

Our Responsibility in Relation to the Financial Statement Audit

As communicated in our engagement letter dated June 7, 2021, our responsibility, as described by professional standards, is to form and express an opinion(s) about whether the financial statements that have been prepared by management with your oversight are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America. Our audit of the financial statements does not relieve you or management of your respective responsibilities.

Our responsibility, as prescribed by professional standards, is to plan and perform our audit to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement. An audit of financial statements includes consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control over financial reporting. Accordingly, as part of our audit, we considered the internal control of the D.C. Everest Area School District solely for the purpose of determining our audit procedures and not to provide any assurance concerning such internal control.

We are also responsible for communicating significant matters related to the audit that are, in our professional judgment, relevant to your responsibilities in overseeing the financial reporting process. However, we are not required to design procedures for the purpose of identifying other matters to communicate to you.

We have provided our findings regarding significant control deficiencies over financial reporting noted during our audit in a separate letter to you dated November 1, 2021.

Planned Scope and Timing of the Audit

We conducted our audit consistent with the planned scope and timing we previously communicated to you.

Compliance with All Ethics Requirements Regarding Independence

The engagement team, others in our firm, as appropriate, our firm, and our network firms have complied with all relevant ethical requirements regarding independence.

Qualitative Aspects of the Entity's Significant Accounting Practices

Significant Accounting Policies

Management has the responsibility to select and use appropriate accounting policies. A summary of the significant accounting policies adopted by the D.C. Everest Area School District is included in Note 1 to the financial statements. There have been no initial selection of accounting policies and no changes in significant accounting policies or their application during 2021. No matters have come to our attention that would require us, under professional standards, to inform you about (1) the methods used to account for significant unusual transactions and (2) the effect of significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.

Significant Accounting Estimates

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's current judgments. Those judgments are normally based on knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ markedly from management's current judgments.

The most sensitive accounting estimates affecting the financial statements were:

Management's estimate of the useful lives of fixed assets is based on prior assets and estimated economic life determined by the asset's manufacturer or vendor.

Management's estimate of the other post-employment benefit liability is calculated by Key Benefits Concepts, LLC, the District's third-party actuary.

Management's estimated liability for dental care claims is based on estimates of the ultimate cost of reported claims and an estimate for claims incurred but not reported based on historical experience.

Management's estimate of the Wisconsin Retirement System pension was calculated by the State of Wisconsin Department of Employee Trust Funds' third-party actuary.

Management's estimate of the Wisconsin Retirement System local retiree life insurance fund was calculated by the State of Wisconsin Department of Employee Trust Funds' third-party actuary.

We evaluated the key factors and assumptions used to develop the estimates listed above in determining that it is reasonable in relation to the financial statements taken as a whole.

Financial Statement Disclosures

The financial statement disclosures are neutral, consistent, and clear.

Significant Difficulties Encountered during the Audit

We encountered no significant difficulties in dealing with management relating to the performance of the audit.

Uncorrected and Corrected Misstatements

For purposes of this communication, professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. Further, professional standards require us to also communicate the effect of uncorrected misstatements related to prior periods on the relevant classes of transactions, account balances or disclosures, and the financial statements as a whole and each applicable opinion unit. Management has corrected all such attached misstatements.

In addition, professional standards require us to communicate to you all material, corrected misstatements that were brought to the attention of management as a result of our audit procedures. None of the misstatements detected as a result of audit procedures and corrected by management were material, either individually or in the aggregate, to each opinion unit's financial statements taken as a whole.

Disagreements with Management

For purposes of this letter, professional standards define a disagreement with management as a matter, whether or not resolved to our satisfaction, concerning a financial accounting, reporting, or auditing matter, which could be significant to the D.C. Everest Area School District's financial statements or the auditors' report. No such disagreements arose during the course of the audit.

Representations Requested from Management

We have requested certain written representations from management, which are included in the attached letter dated November 1, 2021.

Management's Consultations with Other Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters. Management informed us that, and to our knowledge, there were no consultations with other accountants regarding auditing and accounting matters.

Other Significant Matters, Findings, or Issues

In the normal course of our professional association with the D.C. Everest Area School District, we generally discuss a variety of matters, including the application of accounting principles and auditing standards, operating and regulatory conditions affecting the entity, and operational plans and strategies that may affect the risks of material misstatement. None of the matters discussed resulted in a condition to our retention as the D.C. Everest Area School District's auditors.

This report is intended solely for the information and use of the School Board and management of the D.C. Everest Area School District and is not intended to be and should not be used by anyone other than these specified parties.

HAWKINS ASH CPAS, LLP

A handwritten signature in black ink that reads "Hawkins Ash CPAs, LLP". The signature is written in a cursive, slightly slanted style.

Manitowoc, Wisconsin
November 1, 2021



INDEPENDENT AUDITORS' REPORT ON MANAGEMENT ADVISORY COMMENTS

To the Board of Education
D.C. Everest Area School District
Schofield, Wisconsin

We have audited the general purpose financial statements of the D.C. Everest Area School District as of and for the year ended June 30, 2021 and have issued our report thereon dated November 1, 2021. We have also issued compliance reports and reports on the internal control structure in accordance with *Government Auditing Standards*. These reports disclosed any material instances of noncompliance, federal and state program findings and questioned cost, material weaknesses and significant deficiencies that were identified during the audit.

Other matters involving the internal control structure and the District's operations which came to our attention during the audit are reported on the following pages as management advisory comments.

We would like to take this opportunity to acknowledge the many courtesies extended to us by the District's personnel during the course of our work. In particular, we would like to note the considerable assistance and cooperation provided to us by Emily Seehafer and her staff.

We shall be pleased to discuss any of the matters referred to in this letter.

HAWKINS ASH CPAS, LLP

A handwritten signature in cursive script that reads 'Hawkins Ash CPAs, LLP'.

Manitowoc, Wisconsin
November 1, 2021

MANAGEMENT ADVISORY COMMENTS

Current Year Comments

None.

Status of Prior Year Findings

New Standard - GASB Statement No. 87 - Leases (6/30/19)

This statement increases the usefulness of governments' financial statements by requiring recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and recognized as inflows of resources or outflows of resources based on the payment provisions of the contract. It establishes a single model for lease accounting based on the foundational principle that leases are financings of the right to use an underlying asset. Under this statement, a lessee is required to recognize a lease liability and an intangible right-to-use lease asset, and a lessor is required to recognize a lease receivable and a deferred inflow of resources, thereby enhancing the relevance and consistency of information about governments' leasing activities.

A lease is defined as a contract that conveys control of the right to use another entity's nonfinancial asset (underlying asset) as specified in the contract for a period of time in an exchange or exchange-like transaction. Any contract that meets this definition should be accounted for under the leases guidance, unless specifically excluded in this statement.

This statement excludes the following:

- intangible assets (mineral rights, patents, copyrights, licensing contracts for software)
- biological assets (timber, living plants, living animals)
- inventory
- service concession arrangement (GASB Statement No. 60)
- assets financed with conduit debt unless both asset and debt are reported by lessor
- supply contracts (power purchase agreements)
- short-term leases (12 months or less including options to extend)
- contracts that transfer ownership and does not contain termination options
- certain regulated leases (aviation leases)

We recommend all lease contracts that might meet the definition of a lease should be accumulated, identify any contracts that may be excluded based on an exception or materiality, and complete a listing of all the contracts. The listing should include contract description, asset description, term of contract, term extensions, termination clause, payments, and exclusion exception. Please upload the contracts and listing to your portal.

The requirements of this statement are effective for reporting periods beginning after June 15, 2021. Your June 30, 2022 financial statements will be updated for these new reporting requirements.

Status: Unresolved.

APPENDIX A

Client: **0201873 - D.C. Everest Area School District**
 Engagement: **21 Audit - D.C. Everest Area School District**
 Period Ending: **6/30/2021**
 Trial Balance: **Database**
 Workpaper: **1501 - Adjusting Journal Entries Report**

Account	Description	W/P Ref	Debit	Credit
Adjusting Journal Entries				
Adjusting Journal Entries JE # 37				
2021 - Provided by client - to adjust grant receivables.				
10 E --- 933 49----	Transit of aid		2,031.00	
10 R 809 618 129200 322 ---	BILINGUAL/BICULTURAL		60,000.00	
10 R 809 619 500000 445 ---	DISTRICT WIDE		741.00	
10 R 809 630 500000 577 ---	DISTRICT WIDE		30,654.00	
10 R 809 695 500000 000 ---	DISTRICT WIDE		15,689.00	
27 R 809 316 500000 000 ---	DISTRICT WIDE		5,298.00	
50 E --- 415 25----	BUSINESS ADMINISTRATION		223,939.00	
10 A 000 000 715600 000 000 000	DUE FROM FED GOVERNMENT			60,000.00
10 A 000 000 715600 000 000 000	DUE FROM FED GOVERNMENT			741.00
10 A 000 000 715600 000 000 000	DUE FROM FED GOVERNMENT			30,654.00
10 R 809 619 500000 000 ---	DISTRICT WIDE			17,720.00
27 R 809 516 500000 000 ---	DISTRICT WIDE			5,298.00
50 R 834 714 257220 547 ---	LUNCH			223,939.00
Total			338,352.00	338,352.00
Adjusting Journal Entries JE # 38				
2021 - To reclassify amounts to proper accounts.				
10 A 000 000 715100 000 000 000	DUE FROM LOCAL GOVERNMENTS		9,722.00	
10 A 000 000 715500 000 000 000	DUE FROM STATE GOVERNMENT		124,745.00	
10 A 000 000 715200 000 000 000	OTHER WI DISTRICTS			9,722.00
10 A 000 000 715600 000 000 000	DUE FROM FED GOVERNMENT			124,745.00
Total			134,467.00	134,467.00
Adjusting Journal Entries JE # 39				
2021 - To record additional Fund 73 contribution.				
10 E --- 218 11----	UNDIFFERENTIATED CURRICU		7,583.00	
10 E --- 218 25----	BUSINESS ADMINISTRATION		1,133.00	
73 A 000 000 714100 000 000 000	DUE FROM OTHER FUNDS		8,716.00	
10 L 000 000 812000 000 000 000	DUE TO OTHER FUNDS			8,716.00
73 R 809 951 500000 000 ---	DISTRICT WIDE			8,716.00
Total			17,432.00	17,432.00
Adjusting Journal Entries JE # 40				
2021 - Provided by client - to record district operating fund transfer to fund 46.				
10 E --- 846 41----	INTERFUND/OPERATING TRANSFER		4,000,000.00	
46 A 000 000 714100 000 000 000	DUE FROM OTHER FUNDS		4,000,000.00	
10 L 000 000 812000 000 000 000	DUE TO OTHER FUNDS			4,000,000.00
46 R 809 110 411000 000 ---	OPER. TRANSFERS TO DIF FUND			4,000,000.00
Total			8,000,000.00	8,000,000.00
Adjusting Journal Entries JE # 44				
2021 - Provided by client - to record ARPA Medicare credit reclass of revenue.				
27 R 809 990 500000 000 ---	DISTRICT WIDE		11,747.00	
27 R 809 971 500000 000 ---	DISTRICT WIDE			11,747.00
Total			11,747.00	11,747.00
Adjusting Journal Entries JE # 45				
2021 - Provided by client - to record offsetting commodities revenue and expense.				
50 E --- 415 25----	BUSINESS ADMINISTRATION		1,558.00	
50 R 834 714 257220 586 ---	LUNCH			1,558.00
Total			1,558.00	1,558.00
Adjusting Journal Entries JE # 46				
2021 - Provided by client - to adjust wages and benefits for Social Work, Guidance, Health, and Psych Services coded to Fund 27 to meet eligibility requirements.				
10 E --- 100 21----	PUPIL SERVICES		4,263.00	
10 E --- 212 21----	PUPIL SERVICES		288.00	
10 E --- 218 21----	PUPIL SERVICES		44.00	
10 E --- 222 21----	PUPIL SERVICES		326.00	
10 E --- 230 21----	PUPIL SERVICES		5.00	
10 E --- 241 21----	PUPIL SERVICES		1,601.00	
10 E --- 243 21----	PUPIL SERVICES		90.00	
10 E --- 251 21----	PUPIL SERVICES		14.00	
10 E --- 827 41----	INTERFUND/OPERATING TRANSFER		80,049.00	
27 E --- 100 21----	PUPIL SERVICES		58,327.00	
27 E --- 212 21----	PUPIL SERVICES		3,937.00	
27 E --- 218 21----	PUPIL SERVICES		603.00	
27 E --- 222 21----	PUPIL SERVICES		4,462.00	
27 E --- 230 21----	PUPIL SERVICES		149.00	
27 E --- 241 21----	PUPIL SERVICES		17,912.00	
27 E --- 243 21----	PUPIL SERVICES		1,077.00	
27 E --- 251 21----	PUPIL SERVICES		200.00	
10 E --- 100 21----	PUPIL SERVICES			62,874.00
10 E --- 121 23----	GENERAL ADMINISTRATION			4,193.00
10 E --- 218 21----	PUPIL SERVICES			872.00
10 E --- 222 21----	PUPIL SERVICES			4,761.00
10 E --- 230 21----	PUPIL SERVICES			151.00
10 E --- 241 21----	PUPIL SERVICES			12,086.00
10 E --- 243 21----	PUPIL SERVICES			1,557.00
10 E --- 251 21----	PUPIL SERVICES			186.00
27 E --- 100 21----	PUPIL SERVICES			4,584.00
27 E --- 212 21----	PUPIL SERVICES			309.00

27 E -- 218 21----	PUPIL SERVICES		40.00	
27 E -- 222 21----	PUPIL SERVICES		350.00	
27 E -- 230 21----	PUPIL SERVICES		4.00	
27 E -- 241 21----	PUPIL SERVICES		1,249.00	
27 E -- 243 21----	PUPIL SERVICES		70.00	
27 E -- 251 21----	PUPIL SERVICES		12.00	
27 R 809 110 411000 000 ----	OPER. TRANSFERS TO DIF FUND		80,049.00	
Total			173,347.00	173,347.00
Adjusting Journal Entries JE # 47				
2021 - Provided by client - to record Apple lease.				
10 E -- 551 12----	REGULAR CURRICULUM		3,179,415.00	
10 R 809 878 500000 000 ----	DISTRICT WIDE			3,179,415.00
Total			3,179,415.00	3,179,415.00
Adjusting Journal Entries JE # 49				
2021 - Provided by client - to record CCEIS and Flowthrough grant revenue.				
10 A 000 000 711000 000 000 000	CLAIM ON CASH	37,234.00		
10 E -- 827 41----	INTERFUND/OPERATING TRANSFER	1,166.00		
10 R 809 730 500000 341 ----	DISTRICT WIDE	10,090.00		
27 A 000 000 711000 000 000 000	CLAIM ON CASH	1,166.00		
27 A 000 000 715600 000 000 000	DUE FROM FED GOVERNMENT	41,423.00		
27 R 809 730 500000 341 ----	DISTRICT WIDE	1,166.00		
10 A 000 000 711000 000 000 000	CLAIM ON CASH		1,166.00	
10 A 000 000 715600 000 000 000	DUE FROM FED GOVERNMENT		47,324.00	
27 A 000 000 711000 000 000 000	CLAIM ON CASH		37,234.00	
27 L 000 000 811200 000 000 000	ACCOUNTS PAYABLE		5,355.00	
27 R 809 110 411000 000 ----	OPER. TRANSFERS TO DIF FUND		1,166.00	
Total		92,245.00		92,245.00
Adjusting Journal Entries JE # 50				
2021 - Provided by client - to adjust Mental Health Grant Revenue and receivables from the state.				
10 A 000 000 715500 000 000 000	DUE FROM STATE GOVERNMENT	17,841.00		
10 E -- 348 23----	GENERAL ADMINISTRATION	193.00		
80 R 860 990 500000 000 ----	DISTRICT WIDE	434.00		
10 E -- 348 25----	BUSINESS ADMINISTRATION		193.00	
10 R 809 630 500000 297 ----	DISTRICT WIDE		17,841.00	
80 R 860 293 500000 000 ----	DISTRICT WIDE		434.00	
Total		18,468.00		18,468.00
Adjusting Journal Entries JE # 51				
2021 - Provided by client - to reclass eligible ESSER expenses to ESSER project codes.				
10 E -- 100 11----	UNDIFFERENTIATED CURRICU	3,157,667.00		
10 E -- 100 26----	CENTERAL SERVICES	19,570.00		
10 E -- 140 11----	UNDIFFERENTIATED CURRICU	400,832.00		
10 E -- 212 11----	UNDIFFERENTIATED CURRICU	156,754.00		
10 E -- 212 26----	CENTERAL SERVICES	1,321.00		
10 E -- 218 11----	UNDIFFERENTIATED CURRICU	20,936.00		
10 E -- 222 11----	UNDIFFERENTIATED CURRICU	213,073.00		
10 E -- 222 26----	CENTERAL SERVICES	1,497.00		
10 E -- 230 11----	UNDIFFERENTIATED CURRICU	2,161.00		
10 E -- 241 11----	UNDIFFERENTIATED CURRICU	302,748.00		
10 E -- 243 11----	UNDIFFERENTIATED CURRICU	18,740.00		
10 E -- 251 11----	UNDIFFERENTIATED CURRICU	3,815.00		
10 E -- 341 25----	BUSINESS ADMINISTRATION	641,905.00		
10 E -- 353 11----	UNDIFFERENTIATED CURRICU	128.00		
10 E -- 354 11----	UNDIFFERENTIATED CURRICU	1,377.00		
10 E -- 371 11----	Exp	668,187.00		
10 E -- 411 11----	UNDIFFERENTIATED CURRICU	6,333.00		
10 E -- 482 22----	INST STAFF SERVICES	173,160.00		
10 E -- 490 11----	UNDIFFERENTIATED CURRICU	149.00		
50 E -- 100 11----	UNDIFFERENTIATED CURRICU	65,175.00		
50 E -- 212 11----	Exp	4,363.00		
50 E -- 222 11----	Exp	4,986.00		
50 E -- 809 25----	Exp	12,933.00		
80 E -- 100 39----	OTHER COMMUNITY SERVICES	51,289.00		
80 E -- 222 39----	OTHER COMMUNITY SERVICES	2,140.00		
10 E -- 100 11----	UNDIFFERENTIATED CURRICU			2,131,845.00
10 E -- 100 12----	REGULAR CURRICULUM			601,877.00
10 E -- 100 14----	PHYSICAL CURRICULM			86,694.00
10 E -- 100 17----	OTHER SPECIAL NEEDS			9,850.00
10 E -- 100 21----	PUPIL SERVICES			89,158.00
10 E -- 100 22----	INST STAFF SERVICES			24,102.00
10 E -- 100 26----	CENTERAL SERVICES			17,108.00
10 E -- 114 25----	BUSINESS ADMINISTRATION			216,603.00
10 E -- 140 11----	UNDIFFERENTIATED CURRICU			400,832.00
10 E -- 212 11----	UNDIFFERENTIATED CURRICU			92,605.00
10 E -- 212 12----	REGULAR CURRICULUM			35,691.00
10 E -- 212 12----	REGULAR CURRICULUM			7,479.00
10 E -- 212 14----	PHYSICAL CURRICULM			5,852.00
10 E -- 212 17----	OTHER SPECIAL NEEDS			665.00
10 E -- 212 21----	PUPIL SERVICES			5,859.00
10 E -- 212 22----	INST STAFF SERVICES			1,627.00
10 E -- 212 25----	BUSINESS ADMINISTRATION			14,621.00
10 E -- 212 26----	CENTERAL SERVICES			1,155.00
10 E -- 218 11----	UNDIFFERENTIATED CURRICU			9,880.00
10 E -- 218 14----	PHYSICAL CURRICULM			1,976.00
10 E -- 218 21----	PUPIL SERVICES			1,601.00
10 E -- 222 11----	UNDIFFERENTIATED CURRICU			140,479.00
10 E -- 222 12----	REGULAR CURRICULUM			40,342.00
10 E -- 222 14----	PHYSICAL CURRICULM			6,640.00
10 E -- 222 17----	OTHER SPECIAL NEEDS			754.00

10 E -- 222 21----	PUPIL SERVICES		6,634.00
10 E -- 222 22----	INST STAFF SERVICES		1,842.00
10 E -- 222 25----	BUSINESS ADMINSTRATION		16,570.00
10 E -- 222 26----	CENTERAL SERVICES		1,309.00
10 E -- 230 11----	UNDIFFERENTIATED CURRICU		936.00
10 E -- 230 12----	REGULAR CURRICULUM		647.00
10 E -- 230 14----	PHYSICAL CURRICULUM		443.00
10 E -- 230 21----	PUPIL SERVICES		135.00
10 E -- 241 11----	UNDIFFERENTIATED CURRICU		121,603.00
10 E -- 241 12----	REGULAR CURRICULUM		162,771.00
10 E -- 241 14----	PHYSICAL CURRICULUM		1,528.00
10 E -- 241 21----	PUPIL SERVICES		16,846.00
10 E -- 243 11----	UNDIFFERENTIATED CURRICU		7,311.00
10 E -- 243 12----	REGULAR CURRICULUM		9,956.00
10 E -- 243 14----	PHYSICAL CURRICULUM		515.00
10 E -- 243 21----	PUPIL SERVICES		958.00
10 E -- 251 11----	UNDIFFERENTIATED CURRICU		1,409.00
10 E -- 251 12----	REGULAR CURRICULUM		1,808.00
10 E -- 251 14----	PHYSICAL CURRICULUM		297.00
10 E -- 251 21----	PUPIL SERVICES		301.00
10 E -- 341 25----	BUSINESS ADMINSTRATION		641,905.00
10 E -- 353 11----	UNDIFFERENTIATED CURRICU		128.00
10 E -- 354 11----	UNDIFFERENTIATED CURRICU		398.00
10 E -- 354 12----	REGULAR CURRICULUM		979.00
10 E -- 371 43----	PURCHASED INSTRUCTIONAL SERV		668,187.00
10 E -- 411 11----	UNDIFFERENTIATED CURRICU		6,333.00
10 E -- 482 22----	INST STAFF SERVICES		173,160.00
10 E -- 490 11----	UNDIFFERENTIATED CURRICU		149.00
50 E -- 100 25----	BUSINESS ADMINSTRATION		78,108.00
50 E -- 212 25----	BUSINESS ADMINSTRATION		4,363.00
50 E -- 222 25----	BUSINESS ADMINSTRATION		4,986.00
80 E -- 100 39----	OTHER COMMUNITY SERVICES		51,289.00
80 E -- 222 39----	OTHER COMMUNITY SERVICES		2,140.00
Total			<u><u>5,931,239.00</u></u>
Adjusting Journal Entries JE # 53		5401	
2021 - To adjust Common School Fund to actual.			
10 Q 000 000 939200 000 000 000	WORKING CAPITAL (CASH FLOW)		2,198.00
10 Q 000 000 936130 000 000 000	UNSPENT COMMON SCHOOL LIBRARY		2,198.00
Total			<u><u>2,198.00</u></u>
Adjusting Journal Entries JE # 55		1235.46	
2021 - To record interest income in fund 46.			
46 R 809 280 411000 000 --- ---	OPER. TRANSFERS TO DIF FUND		17,606.00
46 R 809 280 500000 000 --- ---	DISTRICT WIDE		17,606.00
Total			<u><u>17,606.00</u></u>
	Total Adjusting Journal Entries		<u><u>17,918,074.00</u></u>
	Total All Journal Entries		<u><u>17,918,074.00</u></u>

APPENDIX B



D.C. Everest Area School District

1699 Schofield Ave, Suite 300
Schofield, WI 54476
Phone 715-359-4221

Kristine A. Gilmore, Ed.D.
Superintendent

MISSION STATEMENT

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D.C. Everest Area School District, in partnership with the community, is committed to being an innovative educational leader in developing knowledgeable, productive, caring, creative, responsible individuals prepared to meet the challenges of an ever-changing global society.

November 1, 2021

Hawkins Ash CPAs, LLP
One East Waldo Blvd., Suite 5
Manitowoc, WI 54220-2912

Dear Hawkins Ash CPAs, LLP,

This representation letter is provided in connection with your audit of the D.C. Everest Area School District as of June 30, 2021, and for the year then ended, and the related notes to the financial statements, for the purpose of expressing opinions on whether the basic financial statements present fairly, in all material respects, the financial position, and results of operations, of the various opinion units of D.C. Everest Area School District in accordance with accounting principles generally accepted for governments in the United States of America (U.S. GAAP).

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in the light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement.

We confirm that, to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves as of November 1, 2021.

Financial Statements

- 1) We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated June 7, 2021, for the preparation and fair presentation of the financial statements of the various opinion units referred to above in accordance with U.S. GAAP.
- 2) We acknowledge our responsibility for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.
- 3) We acknowledge our responsibility for the design, implementation, and maintenance of internal control to prevent and detect fraud.
- 4) We acknowledge our responsibility for compliance with the laws, regulations, and provisions of contracts and grant agreements.
- 5) We have reviewed, approved, and taken responsibility for the financial statements and related notes.
- 6) We have a process to track the status of audit findings and recommendations.
- 7) We have identified and communicated to you all previous audits, attestation engagements, and other studies related to the audit objectives and whether related recommendations have been implemented.
- 8) Significant assumptions used by us in making accounting estimates, including those measured at fair value, are reasonable.
- 9) Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of U.S. GAAP.
- 10) All events subsequent to the date of the financial statements and for which U.S. GAAP requires adjustment or disclosure have been adjusted or disclosed.
- 11) We have reviewed and approved the various adjusting journal entries that were proposed by you for recording in our books and records and reflected in the financial statements.
- 12) We are not aware of any pending or threatened litigation, claims, or assessments, or unasserted claims or assessments that are required to be accrued or disclosed in the financial statements in accordance

with GASB Statement No. 62 (GASB-62), *Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements* (FASB Accounting Standards Codification 450, *Contingencies*), and we have not consulted a lawyer concerning litigation, claims, or assessments.

- 13) All funds and activities are properly classified.
- 14) All funds that meet the quantitative criteria in GASB Statement No. 34, *Basic Financial Statements-and Management's Discussion and Analysis-for State and Local Governments*, GASB Statement No. 37, *Basic Financial Statements-and Management's Discussion and Analysis-for State and Local Governments: Omnibus* as amended, and GASB Statement No. 65, *Items Previously Reported as Assets and Liabilities*, for presentation as major are identified and presented as such and all other funds that are presented as major are considered important to financial statement users.
- 15) All components of net position, nonspendable fund balance, and restricted, committed, assigned, and unassigned fund balance are properly classified and, if applicable, approved.
- 16) Our policy regarding whether to first apply restricted or unrestricted resources when an expense is incurred for purposes for which both restricted and unrestricted net position/fund balance are available is appropriately disclosed and net position/fund balance is properly recognized under the policy.
- 17) All revenues within the statement of activities have been properly classified as program revenues, general revenues, contributions to term or permanent endowments, or contributions to permanent fund principal.
- 18) All expenses have been properly classified in or allocated to functions and programs in the statement of activities, and allocations, if any, have been made on a reasonable basis.
- 19) All interfund and intra-entity transactions and balances have been properly classified and reported.
- 20) Special items and extraordinary items have been properly classified and reported.
- 21) Deposit and investment risks have been properly and fully disclosed.
- 22) Capital assets, including infrastructure assets, are properly capitalized, reported, and if applicable, depreciated.
- 23) All required supplementary information is measured and presented within the prescribed guidelines.
- 24) With regard to investments and other instruments reported at fair value:
 - The underlying assumptions are reasonable and they appropriately reflect management's intent and ability to carry out its stated courses of action.
 - The measurement methods and related assumptions used in determining fair value are appropriate in the circumstances and have been consistently applied.
 - The disclosures related to fair values are complete, adequate, and in accordance with U.S. GAAP.
 - There are no subsequent events that require adjustments to the fair value measurements and disclosures included in the financial statements.
- 25) With respect to the nonattest services provided, we have performed the following:
 - Made all management decisions and performed all management functions;
 - Assigned a competent individual to oversee the services;
 - Evaluated the adequacy of the services performed;
 - Evaluated and accepted responsibility for the result of the service performed; and
 - Established and maintained internal controls, including monitoring ongoing activities.
- 26) With respect to the supplementary information accompanying the financial statements:
 - We acknowledge our responsibility for the presentation of the supplementary information with U.S. GAAP.
 - We believe the supplementary information, including its form and content, is fairly presented in accordance with U.S. GAAP.
 - The methods of measurement or presentation have not changed from those used in the prior period.
 - We believe the significant assumptions or interpretations underlying the measurement or presentation of the supplementary information, and the basis for our assumptions and interpretations, are reasonable and appropriate in the circumstances.
 - We acknowledge our responsibility to include the auditors' report on the supplementary information in any document containing the supplementary information and that indicates the auditor reported on such supplementary information.
 - We acknowledge our responsibility to present the supplementary information with the audited financial statements or, if the supplementary information will not be presented with the audited

financial statements, to make the audited financial statements readily available to the intended users of the supplementary information no later than the date of issuance by the entity of the supplementary information and the auditors' report thereon.

- 27) With respect to the required supplementary information accompanying the financial statements:
- We acknowledge our responsibility for the presentation of the required supplementary information in accordance with U.S. GAAP.
 - We believe the required supplementary information, including its form and content, is measured and fairly presented in accordance with U.S. GAAP.
 - The methods of measurement or presentation have not changed from those used in the prior period.
 - We believe the significant assumptions or interpretations underlying the measurement or presentation of the required supplementary information, and the basis for our assumptions and interpretations, are reasonable and appropriate in the circumstances.
- 28) With respect to the summary financial report:
- We acknowledge our responsibility for the preparation of the summary financial statements in accordance with the applied criteria and believe the applied criteria are acceptable.
 - We have made the audited financial statements readily available to the intended users of the summary financial statements, when the summary financial statements will not be accompanied by the audited financial statements.

Information Provided

- 29) We have provided you with:
- Access to all information, of which we are aware that is relevant to the preparation and fair presentation of the financial statements of the various opinion units referred to above, such as records, documentation, meeting minutes, and other matters;
 - Additional information that you have requested from us for the purpose of the audit; and
 - Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.
- 30) All transactions have been recorded in the accounting records and are reflected in the financial statements.
- 31) We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- 32) We have provided to you our analysis of the entity's ability to continue as a going concern, including significant conditions and events present, and if necessary, our analysis of management's plans, and our ability to achieve those plans.
- 33) We have no knowledge of any fraud or suspected fraud that affects the entity and involves:
- Management;
 - Employees who have significant roles in internal control; or
 - Others where the fraud could have a material effect on the financial statements.
- 34) We have no knowledge of any allegations of fraud, or suspected fraud, affecting the entity's financial statements communicated by employees, former employees, vendors, regulators, or others.
- 35) We are not aware of any pending or threatened litigation, claims, and assessments whose effects should be considered when preparing the financial statements and we have not consulted legal counsel concerning litigation, claims, or assessments.
- 36) We have disclosed to you the identity of the entity's related parties and all the related party relationships and transactions of which we are aware.
- 37) There have been no communications from regulatory agencies concerning noncompliance with or deficiencies in accounting, internal control, or financial reporting practices.
- 38) The entity has no plans or intentions that may materially affect the carrying value or classification of assets and liabilities.
- 39) We have disclosed to you all guarantees, whether written or oral, under which the entity is contingently liable.
- 40) We have disclosed to you all nonexchange financial guarantees, under which we are obligated and have declared liabilities and disclosed properly in accordance with GASB Statement No. 70, *Accounting and*

Financial Reporting for Nonexchange Financial Guarantees, for those guarantees where it is more likely than not that the entity will make a payment on any guarantee.

- 41) For nonexchange financial guarantees where we have declared liabilities, the amount of the liability recognized is the discounted present value of the best estimate of the future outflows expected to be incurred as a result of the guarantee. Where there was no best estimate but a range of estimated future outflows has been established, we have recognized the minimum amount within the range.
- 42) We have disclosed to you all significant estimates and material concentrations known to management that are required to be disclosed in accordance with GASB Statement No. 62 (GASB-62), *Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements*. Significant estimates are estimates at the balance sheet date that could change materially within the next year. Concentrations refer to volumes of business, revenues, available sources of supply, or markets or geographic areas for which events could occur that would significantly disrupt normal finances within the next year.
- 43) We have identified and disclosed to you the laws, regulations, and provisions of contracts and grant agreements that could have a direct and material effect on financial statement amounts, including legal and contractual provisions for reporting specific activities in separate funds.
- 44) There are no:
 - Violations or possible violations of laws or regulations, or provisions of contracts or grant agreements whose effects should be considered for disclosure in the financial statements or as a basis for recording a loss contingency, including applicable budget laws and regulations.
 - Unasserted claims or assessments that our lawyer has advised are probable of assertion and must be disclosed in accordance with GASB-62.
 - Other liabilities or gain or loss contingencies that are required to be accrued or disclosed by GASB-62.
 - Continuing disclosure consent decree agreements or filings with the Securities and Exchange Commission and we have filed updates on a timely basis in accordance with the agreements (Rule 240, 15c2-12).
- 45) The entity has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset or future revenue been pledged as collateral, except as disclosed to you.
- 46) We have complied with all aspects of grant agreements and other contractual agreements that would have a material effect on the financial statements in the event of noncompliance.
- 47) We believe that the actuarial assumptions and methods used to measure pension and other postemployment benefit liabilities and costs for financial accounting purposes are appropriate in the circumstances.
- 48) We have provided to you our views on reported audit findings, conclusions, and recommendations, as well as planned corrective actions.

Federal and State Award Programs

- 49) We are responsible for understanding and complying with and have complied with the requirements of Title 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements of Federal Awards* (the Uniform Guidance) and state regulatory audit requirements, including requirements relating to preparation of the schedule of expenditures of federal awards (SEFA) and schedule of state financial assistance (SSFA), or we acknowledge our responsibility for presenting the SEFA and SSFA in accordance with the requirements and we believe the SEFA and SSFA, including its form and content, is fairly presented in accordance with the Uniform Guidance and state regulatory requirements. The methods of measurement or presentation of the SEFA and SSFA have not changed from those used in the prior period and we have disclosed to you any significant assumptions and interpretations underlying the measurement or presentation of the SEFA and SSFA.
- 50) We have identified and disclosed to you all of our government programs and related activities subject to the Uniform Guidance and state regulatory requirements and included in the SEFA and SSFA made during the audit period for all awards provided by federal and state agencies in the form of grants, cost-reimbursement contracts, loans, loan guarantees, property (including donated surplus property), cooperative agreements, interest subsidies, insurance, food commodities, direct appropriations, and other direct assistance.

- 51) We are responsible for understanding and complying with, and have complied with, the requirements of laws, regulations, and the provisions of contracts and grant agreements related to each of our federal and state programs and have identified and disclosed to you the requirements of laws, regulations, and the provisions of contracts and grant agreements that are considered to have a direct and material effect on each major program.
- 52) We are responsible for establishing and maintaining, and have established and maintained, effective internal control over compliance requirements applicable to federal and state programs that provides reasonable assurance that we are managing our federal and state awards in compliance with laws, regulations, and the provisions of contracts and grant agreements that could have a material effect on our federal and state programs. We believe the internal control system is adequate and is functioning as intended.
- 53) We have made available to you all contracts and grant agreements (including amendments, if any) and any other correspondence with federal or state agencies or pass-through entities relevant to federal and state programs and related activities.
- 54) We have received no requests from a federal or state agency to audit one or more specific programs as a major program.
- 55) We have complied with the direct and material compliance requirements, including when applicable, those set forth in the *OMB Compliance Supplement* and state regulatory audit requirements relating to federal and state awards and have identified and disclosed to you all amounts questioned and all known noncompliance with the requirements of federal and state awards.
- 56) We have disclosed any communications from grantors and pass-through entities concerning possible noncompliance with the direct and material compliance requirements, including communications received from the end of the period covered by the compliance audit to the date of the auditor's report.
- 57) We have disclosed to you the findings received and related corrective actions taken for previous audits, attestation engagements, and internal or external monitoring that directly relate to the objectives of the compliance audit, including findings received and corrective actions taken from the end of the period covered by the compliance audit to the date of the auditor's report.
- 58) Amounts claimed or used for matching were determined in accordance with relevant guidelines in the Uniform Guidance and state regulatory audit requirements.
- 59) We have disclosed to you our interpretation of compliance requirements that may have varying interpretations.
- 60) We have made available to you all documentation related to compliance with the direct material compliance requirements, including information related to federal and state program financial reports and claims for advances and reimbursements.
- 61) We have disclosed to you the nature of any subsequent events that provide additional evidence about conditions that existed at the end of the reporting period affecting noncompliance during the reporting period.
- 62) There are no such known instances of noncompliance with direct and material compliance requirements that occurred subsequent to the period covered by the auditor's report.
- 63) No changes have been made in internal control over compliance or other factors that might significantly affect internal control, including any corrective action we have taken regarding significant deficiencies in internal control over compliance (including material weaknesses in internal control over compliance), subsequent to the date as of which compliance was audited.
- 64) Federal and state program financial reports and claims for advances and reimbursements are supported by the books and records from which the financial statements have been prepared.
- 65) The copies of federal and state program financial reports provided you are true copies of the reports submitted, or electronically transmitted, to the respective federal and state agency or pass-through entity, as applicable.
- 66) We have charged costs to federal and state awards in accordance with applicable cost principles.
- 67) We are responsible for and have accurately prepared the summary schedule of prior audit findings to include all findings required to be included by the Uniform Guidance and state regulatory audit requirements and we have provided you with all information on the status of the follow-up on prior audit findings by federal and state awarding agencies and pass-through entities, including all management decisions.

- 68) We are responsible for and have accurately prepared the auditee section of the Data Collection Form as required by the Uniform Guidance.
- 69) We are responsible for preparing and implementing a corrective action plan for each audit finding.



Director of Finance



Assistant Superintendent



D.C. Everest Area School District

6300 Alderson Street
Weston, WI 54476
Phone 715-359-4221
www.dce.k12.wi.us

Matthew A. Spets
Assistant Superintendent

MISSION STATEMENT

D.C. Everest Area School District, in partnership with the community, is committed to being an innovative educational leader in developing knowledgeable, productive, caring, creative, responsible individuals prepared to meet the challenges of an ever-changing global society.

DATE November 17, 2021
TO Dr. Kristine Gilmore, Superintendent
FROM Matt Spets, Assistant Superintendent
RE Recommendations for Administration Building Project

Summary

With the start of the 2021-2022 school year most of our public-facing work has been student-focused. Behind the scenes, the core team from DCE leadership has been working with EUA in Phase 1 of concept development for our next administration building. We have two time-bound recommendations coming forward at this time.

Recommendations

1 It is recommended the Board approve the DCE leadership team to formalize the partnership with EUA (Eppstein Uhen Architects) by moving to Phase 2 for design, engineering and architecture.

The letter of agreement with EUA is included in the board packet.

2 It is recommended the Board approve the DCE leadership team work with EUA's consultation to issue a construction management RFP (request for proposal) for the administrative building.

Next Steps

We anticipate the RFP responses will be due on or before Friday, December 17, 2021. As part of our process, we will assemble a small committee to meet with the potential construction management firms and have them respond in a short interview format. For added community transparency, we would like the Board to consider placing one member as a volunteer for this committee.

The tentative date for the interviews is Wednesday, December 22, 2021.

The overall goal is to bring the recommendation for construction manager to the Board for the January 19, 2022 meeting. We anticipate making significant progress in the design / engineering / schematic stage by that time.



- WORKSTATIONS / OPEN OFFICE
- PRIVATE OFFICE
- EXECUTIVE SUITE OFFICES
- MEETING SPACES
- AMENITIES
- SUPPORT
- CIRCULATION
- BUILDING CORE



milwaukee : 333 E Chicago St	414.271.5350
madison : 309 W Johnson St, Ste 202	608.442.5350
denver : 1899 Wynkoop St, Ste 300	303.595.4500
	eua.com

January 8, 2021

Matthew Spets
 Asst. Superintendent Business + Personnel Services
 D. C. Everest Area School District
 6300 Alderson St
 Weston, WI 54476

**Re: D.C. EVEREST AREA SCHOOL DISTRICT COMMUNITY LEARNING CENTER
 EUA Project No.: 320561-01**

Dear Matt:

We would like to thank you for giving Eppstein Uhen Architects, Inc. (EUA) the opportunity to work with you and your team on the D.C. Everest Area School District Community Learning Center project.

Project Understanding and Scope

This letter of agreement is to confirm your acceptance of our proposal to perform master planning and subsequent architectural design services for the D.C. Everest Area School District Community Learning Center project located in Weston, WI per our conversation on Monday December 7, 2020.

We will provide architectural services as requested for the DCE Area School District Community Learning Center Project. These services include, but are not limited to, the following:

Phase 1 – Master planning, conceptual site and floor plans and cost estimating for three (3) options/sites as outlined in our Proposal dated December 16, 2020. Cost estimating services will be provided by JH Findorff. The estimated Phase 1 project schedule is January – May 2021.

Renderings are not included in the scope or fee for Phase 1 but can be developed to show massing, site design, window placement, and preliminary design intent. Renderings would cost approximately \$2,500 per image and typically require two to three weeks production time.

Engineering services are not anticipated or included at this time for Phase 1 but may be added, at your request, if needed for this project.

Phase 2 – Schematic Design, Design Development, Construction Documents + Construction Administration

The estimated Phase 2 project schedule is TBD depending on the scope of the project and when the District selects the preferred project for design and construction. Once the project is approved to move forward, EUA will issue a standard AIA contract to the District which follows the fee percentage structure below.

Fee

Phase 1 – Fixed Fee of Twenty-Eight Thousand and Seven Hundred and Fifty Dollars (\$28,750) + standard reimbursable expenses.

EUA	\$25,000
JH Findorff – Cost estimating subcontractor to EUA	\$ 3,750

Phase 2 –

Construction Cost	Fee% New Construction	Fee% Addition/ Renovation
\$500,000 to \$999,999	Negotiated	Negotiated
\$1.0 million to \$1.99 million	9.75%	10.00%
\$2.0 million to \$2.99 million	9.5%	9.75%
\$3.0 million to \$4.99 million	8.5%	8.75%
\$5.0 million to \$9.99 million	7.5%	7.75%

Terms and Conditions

Eppstein Uhen Architects, Inc.'s Standard Terms and Conditions are attached and incorporated into this proposal by reference.

If you are in agreement with this proposal, please return a signed copy of this letter to us and retain a signed copy for your records. Upon acceptance of this proposal, we will begin services.

We appreciate your consideration and look forward to working with you on this exciting project. If you have any questions, please feel free to call me directly at (414) 298-2249.

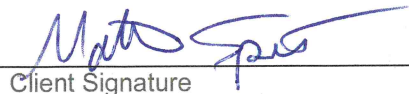
Sincerely,



Eric Gehardt
Project Manager



Teresa Wadzinski
Learning Environments Studio Director



Client Signature

January 15, 2021

Date

MATT SPETS

Printed Name

Assistant Superintendent, Business/Personnel Services
Title

Attachments:

EUA's Standard Terms and Conditions

EG/hd/LOA1 DCEASD Community Learning Center 2021_0108.docx



milwaukee : 333 E Chicago St | 414.271.5350
madison : 309 W Johnson St, Ste 202 | 608.442.5350
denver : 1899 Wynkoop St, Ste 300 | 303.595.4500
eua.com

Eppstein Uhen Architects, Inc.'s Standard Terms and Conditions

These Standard Terms and Conditions are material terms of the Letter of Agreement proposed on January 8, 2021 (Agreement) by and between Eppstein Uhen Architects, Inc. (Architect) and D.C. Everest Area School District (Client).

Standard of Care: Services provided by Architect shall be consistent with the professional skill and care ordinarily provided by architects practicing in the same or similar locality under the same or similar circumstances.

Additional Services: Services requested or required beyond the scope of the basic services shall be additional services and shall be compensated on an hourly basis or for a negotiated fee. The Architect shall notify the Client of the need for additional services and obtain written approval in advance of providing the services. If necessary to avoid a delay in the project schedule the Architect shall provide additional services prior to receiving the Client's written approval, notifying the Client promptly. If the Client elects not to have the Architect continue with the additional services, the Client shall notify the Architect in writing; however, the Architect shall be compensated for the additional services completed to the date of notice.

Reimbursable Expenses: Reimbursable expenses include printing, plotting, deliveries, mileage, permit fees, and other similar project related expenses and are not included in the contract fee. Reimbursables will be billed at cost times 1.1.

Licensing / User Fees: Licenses and fees for use of building information modeling, collaboration, construction management, file share/management, or other such software or services, the use of which is required by the Client and dedicated exclusively to this Project, except where the Architect and Architect's consultants already maintain licenses or pay fees for such software or services, are a Reimbursable Expense.

Invoicing & Payment: Invoices will be sent monthly with payments due within thirty (30) days of the invoice date. Payment shall not be contingent upon any third-party financial agreements. Invoices outstanding past thirty (30) days will accrue interest at a rate of one and one-half percent (1.5%) per month. Invoices

outstanding past sixty (60) days shall be cause for suspension or termination of services.

Building Information Modeling: The Architect shall utilize building information modeling on the Project for the sole purpose of fulfilling its obligations set forth in this Agreement without an expectation that the model will be relied upon by the Client or the Client's other consultants or contractors. Any use of, or reliance on, all or a portion of a building information model shall be at the using or relying party's sole risk and without liability to the other party and its contractors or consultants, the authors of, or contributors to, the building information model, and each of their agents and employees.

Design Contingency: At the start of project design the Architect recommends the Client establish a design contingency of at least 5% of the overall construction cost. This contingency is established to resolve unforeseen issues during initial design and any additional project costs due to information or aspects of the Project not known or otherwise excluded at the time the initial project budget was established.

Construction Contingency: At the start of construction, the Architect recommends the Client establish a construction contingency of at least 5% to cover changes in site conditions, gas, telephone, and electrical connection costs, dimension variances, construction variances, changes in Client needs, upgrading of materials, code compliance, coordination, and similar. A contingency of 10% is recommended in fast track or remodeling projects.

Project Suspension or Delay: The Architect shall be compensated for services performed prior to notice of a suspension or delay. When the Project is resumed, the Architect shall be compensated for expenses incurred in the interruption and resumption of the Architect's services. The Architect's fees for the remaining services and the time schedules and deadlines shall be equitably adjusted. The Architect's services, compensation, and schedule under this

Agreement have been developed based upon the available or expected project schedule. Deviation from such available or expected project schedule, or any unplanned suspension or delay, may have a substantial impact on the Architect's staffing, consultants, and proposed sequence of services. In addition to the terms under this section, in the event of a material suspension or delay, including any unplanned suspension or delay, not the sole fault of the Architect, the Architect reserves the right to make changes to the original project team, including consultants, as the Architect deems necessary. Changes necessary to accommodate deviations to the available or expected schedule and services impacted thereby may be subject to Additional Services or adjustment in the Architect's compensation

Construction Administration: If the Project includes construction, the Architect shall provide construction administration site visits appropriate to the Project or as defined in the Agreement. Architect shall become generally familiar with the progress and quality of the portion of the work completed, and determine, in general, if the work observed is being performed in a manner indicating that the work, when fully completed, will be in accordance with the Contract Documents. The Architect shall not be required to make exhaustive or continuous on-site inspections.

Construction Means and Methods: The Architect shall not have control over, charge of, or responsibility for the construction means, methods, techniques, sequences or procedures, or for safety precautions and programs in connection with the Work, nor shall the Architect be responsible for the Contractor's failure to perform the Work in accordance with the requirements of the Contract Documents.

Construction Cost: For projects where the Architect's compensation is a percentage of the construction cost of the Project, the construction cost is hereby defined to include the total cost to the Client to construct all elements of the Project designed or specified by the Architect (including project alternates); the contractors' general conditions costs, overhead, and profit; and costs for land surveys and geotechnical services.

Furniture, Fixture, and Equipment (FFE): Furniture, fixture, and equipment will also be considered part of construction cost identified above, if those items were specified or coordinated by the architect, unless a separate fee for those services is identified elsewhere in this Agreement.

Existing Conditions: The Architect shall utilize documentation regarding existing conditions furnished by the Client and the Architect shall be entitled to rely on the accuracy and completeness of the information provided. If the existing conditions materially differ from the documentation furnished by the Client, the Architect shall have no responsibility for any costs or expense incurred by the Client as a result of the differing conditions. If the Architect is required to make changes to the Architect's instruments of service the Client shall compensate the Architect for such services as an Additional Service. The Client will indemnify, defend, and hold harmless the Architect from and against any and all claims against the Architect arising out of or related to the condition of any existing buildings.

Instruments of Service: The Architect shall retain ownership and all common law, statutory, and other reserved rights, including copyrights, in and to all instruments of services developed by the Architect including drawings, specifications, digital models, and other documents. Use of the instruments of services by the Client without the Architect's written consent shall be at the Client's sole risk. The Client agrees to indemnify, defend, and hold harmless the Architect and its consultants from all costs and expenses, including reasonable attorney's fees from such unauthorized use.

Dispute Resolution: The Client and the Architect agree to address any claims or disputes through direct discussion between the parties. If an agreement is not reached through direct discussion, parties agree to non-binding mediation. If the claim or dispute is not resolved through mediation, the method of binding dispute resolution shall be arbitration. Mediation and arbitration shall be administered by the American Arbitration Association unless otherwise agreed between the parties.

Indemnification: The Client shall indemnify and hold the Architect and the Architect's Consultants and their respective officers and employees harmless from and against damages, losses and judgments arising from claims by third parties, including reasonable attorneys' fees and expenses recoverable under applicable law, but only to the extent they are caused by the negligent acts or omissions of the Client, its employees and its consultants, or breach of these terms. The Client's obligation to indemnify and hold the Architect and the Architect's Consultants and their respective officers and employees harmless does not include a duty to defend.

The Architect shall indemnify and hold the Client and the Client's officers and employees harmless from and against damages, losses and judgments arising from claims by third parties, including reasonable attorneys' fees and expenses recoverable under applicable law, but only to the extent they are caused by the negligent acts or omissions of the Architect, its employees and its consultants in the performance of professional services under this Agreement. The Architect's obligation to indemnify and hold the Client and the Client's officers and employees harmless does not include a duty to defend.

Limitation of Liability: Neither the Architect, the Architect's consultants, nor their officers, employees, or agents shall be jointly, severally or individually liable to the Client or any other person in excess of the compensation to be paid pursuant to this Agreement for any claim arising out of or relating to any act or omission, including but not limited to breach of contract or negligence.

Assignability: Neither the Client nor the Architect shall assign this Agreement without the written consent of the other.

Termination: The Architect or the Client may terminate this Agreement upon not less than seven (7) days written notice for convenience and without cause. The Architect shall be paid all sums due for work completed prior to notice of termination.

Survivability: In the event any term, provision, or condition of this Agreement shall be held to be void or otherwise unenforceable under the law governing this Agreement, the remaining terms, provisions, and conditions shall remain valid and binding upon the parties. One or more waivers by either party of any term, provision, or condition shall not be construed by the other party as a waiver of subsequent breach of the same by the other part.

Acceptance of Terms: If the Client provides verbal or written notification to proceed other than signing this Agreement the Client agrees to be bound by terms and conditions stated herein in their entirety.

Billing Rates: Services provided on an hourly basis will be billed based on the Architect's hourly billing rates in effect at the time the services are provided. The Architect's billing rates are subject to periodic change.

Release of Documents: The Architect shall not release documents for any reason or under any circumstances without first having received a signed Agreement from the Client.

Integrated Agreement: This Agreement represents the entire and integrated Agreement between Architect and Client and supersedes all prior representations or agreements, written or oral. If the Client issues a purchase order or other document for services provided by the Architect, it shall be for the Client's administrative purposes only and its terms and conditions will not be of any force or effect against the Architect.

Governing Law: This Agreement and any disputes in connection with this Agreement shall be governed by the laws of the State of Wisconsin without regard to said state's choice of law rules.



D.C. Everest Area School District

6300 Alderson Street
Weston, WI 54476
Phone 715-359-4221
www.dce.k12.wi.us

Matthew A. Spets
Assistant Superintendent

MISSION STATEMENT

D.C. Everest Area School District, in partnership with the community, is committed to being an innovative educational leader in developing knowledgeable, productive, caring, creative, responsible individuals prepared to meet the challenges of an ever-changing global society.

DATE November 17, 2021
TO Dr. Kristine Gilmore, Superintendent
FROM Matt Spets, Assistant Superintendent
RE Recommendations for Sports Performance and Recreation Center

Summary

This recommendation allows us to make a formal, next step in the Sports Performance and Recreation Center collaborative project with the D.C. Everest Education Foundation.

Recommendation 1

It is recommended the Board approve the DCE leadership team create and publish a Request for Information (RFI) for fact-finding and feasibility of a permanent structure to be constructed on the Senior High campus.

Feasibility means finding a firm that has designed a structure similar to the SPRC vision. We will also ask to receive estimates in overall cost, access to necessary construction materials, realistic timeline for completion, and information on the functionality of comparable facilities.

Recommendation 2

It is recommended that the Board approve the DCE leadership team create and publish a Request for Proposal (RFP) for design, engineering, and architecture for either a permanent structure or air-filled dome after the D.C. Everest Education Foundation and the SPRC reviews the RFI.

Next Steps

We anticipate the RFI responses will be due on or before Friday, December 3, 2021. We will present the RFI responses to the D.C. Everest Education Foundation and SPRC committee, which includes lead donors, to make a determination if a permanent structure is feasible. At that time, we will move forward with a formal Request for Proposal (RFP) for design, engineering, and architecture for either a permanent structure or air-filled dome.

The tentative date for releasing the RFP is Wednesday, December 22, 2021.



D.C. Everest Area School District

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Laticia Baudhuin, RD
Director of School Nutrition

MISSION STATEMENT

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D.C. Everest Area School District, in partnership with the community, is committed to being an innovative educational leader in developing knowledgeable, productive, caring, creative, responsible individuals prepared to meet the challenges of an ever-changing global society.

Memorandum

To: Matt Spets, Asst. Superintendent-Business/Personnel

From: Laticia Baudhuin, Director of School Nutrition

Date: 11/1/2021

Re: Adult Meals Pricing

USDA memo SP 22-2021, Q13 sets the following minimum adult meal prices for SY 21-22:

	<u>Breakfast</u>	<u>Lunch</u>
Adult	\$2.56	\$4.65

These prices reflect a \$0.56 increase in adult breakfast and a \$1.10 increase in adult lunch. I am requesting approval of this meal price increase, effective date December 1, 2021.

Attendance, Quarantine, Mitigation Update

DCE School Board: November 17, 2021

Intended Outcomes for Tonight's Discussion

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1. Share district data, provide mitigation overview/update and interpretation in order to inform Board decision-making
2. Answer questions to the best of our ability based on our experience over the past 18+ months
3. Provide a recommendation related to adjustments to existing practice

Overview

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Framing/Context: *Dr. Gilmore*

Relevant School Data: *Dr. Nye, Dr. Lindell*

Mitigation Efforts: *Dr. Nye, Mr. Spets*

Discussion of Recommendations: *Dr. Gilmore*

Framing/Context

- * Decisions and protocols have been followed to provide a healthy learning environment while focusing on keeping students in school.
- * While some data is definitive (i.e. absence rates, positives, quarantines) that doesn't mean that we will all interpret what it means- and how we should respond- in the same way.
- * There are new dynamics today that make it the right time to adjust our protocols.
- * Students and families negatively impacted by large numbers of quarantines (learning loss, childcare, emotional wellbeing.)
- * Principals, office staff, nurses and teachers are stretched dealing with large number of quarantines and isolations.

Data for Board Review/Consideration/Discussion

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1. **Attendance rates** (three years, quarter one comparison)
2. **COVID specific data** (two-years, September-October comparison of positive cases, isolation and quarantine rates by school and district)

Disclaimers: This data only reflects the number of absences, isolations, quarantines, and positive cases. We CANNOT determine where the transmission occurred for positive cases.

3-yr Attendance Comparison: Quarter 1 Comparison

Quarter 1 of each year			19-20		20-21		w/REM		21-22		w/REM	
	Absent Days	Absent %	Absent Days	Absent %	Absent Days	Absent %	Absent Days	Absent %	Absent Days	Absent %	Absent Days	Absent %
4K	517	3.24%	1150	7.91%	1159	7.98%	1488	10.31%	1488	10.31%		
EVER	635.9	2.97%	674.8	3.06%	1588.9	7.20%	821.2	3.89%	1814.5	8.59%		
HATL	172.6	3.61%	200.9	3.90%	496.9	9.64%	106.4	2.03%	251.9	4.81%		
MOUN	584.1	3.02%	598.1	2.90%	1608.3	7.80%	784.7	3.74%	1353.6	6.45%		
ODYS	72	2.58%	117.4	3.90%	271.4	9.02%	97.3	3.28%	247	8.32%		
RIV	527.9	2.45%	616.4	2.64%	1840.9	7.88%	514	2.34%	2109.2	9.60%		
ROTH	486.2	2.77%	509.4	2.79%	1611.8	8.82%	775.3	4.31%	1167.3	6.48%		
WEST	797.9	3.52%	1787.5	6.79%	3479.3	13.22%	967.2	4.04%	2522.6	10.54%		
MID	1273.4	3.26%	778.1	1.95%	1609	4.04%	1706.1	4.53%	3139	8.33%		
JRH	1262.1	3.45%	794.9	1.95%	2210.2	5.43%	2048.3	5.14%	4197.3	10.53%		
SRH	3008.7	5.26%	1663.1	3.20%	4020.6	7.74%	4069.9	6.88%	5850.8	9.89%		
IDEA	107.3	3.42%	58.2	1.74%	58.2	1.74%	156	4.82%	278.4	8.59%		

****REM = Remote learning for students who are isolated or quarantined.****

2-yr Comparison - Isolation/Positive Test/Quarantines

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September - November 16									
Isolations			Positive Tests		Exp School	Quarantines		Exp School	
	20-21	21-22	20-21	21-22		20-21	21-22		
4K	7	0		0	0	9	0	0	
EVER	81	122	9	32	3	98	129	77	
HATL	27	31			0	42	6	0	
MOUN	48	103	9	15	1	112	54	30	
ODYS	23	40			0	15	6	6	
RIVE	79	87	18	45	17	124	205	173	
ROTH	41	40	7	9	1	134	50	18	
WEST	56	224	17	29	5	165	174	143	
MID	109	192	25	37	1	203	138	95	
JRH	149	364	29	54	7	201	250	203	
SRH	158	368	65	83	6	257	196	128	
IDEA	0	41	0			0	1	1	
Totals	778	1612	183	311	41	1360	1209	874	

**** MISSING VALUES ASSUME VALUE IS LESS THAN 5 ****

Multiple Isolations/Quarantines: through mid-November

	20-21	21-22
Students with 2 quarantines	110	117
Students with 3 quarantines	8	14
Students with 2 isolations	52	158
Students with 3 isolations	3	17
Students with 4 isolations	1	0

Additional data

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- 41 students out of 874 total students placed on a school-based quarantine ended up as positive Covid cases
- 136 of the 311 positive cases are siblings or share a residence

Past (2020-21) and Current (Fall 2021-22) Mitigation

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- *Elementary Cohorting, A and B Schedules, Hybrid Learning, Remote Learning*
- *EVA Enrollment Shift*
- *Recommended Masks*
- *Class Size Shifts*

Practitioner Interpretation: Observed Trends

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Background:

We continue to have a district team meet (at a minimum) 3 times per week.

That team invites others in, based on current situations.

Our discussions regularly center on trying to make sense of current staff and student attendance patterns and what to do either preventatively or in response to them.

Frequent discussion with School Nursing Team.

Observations Related to The Data: *Discussion*

Contextual Reasons to Consider in Adjusting Protocol

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1. Weighing impact of absence rate (preventative vs. negative impacts)
2. Current community COVID rates
3. Current parent feedback related to existing protocols
4. Availability of other preventative measures that didn't exist previously (i.e. increased vaccine eligibility/availability)

For Board Consideration/Discussion

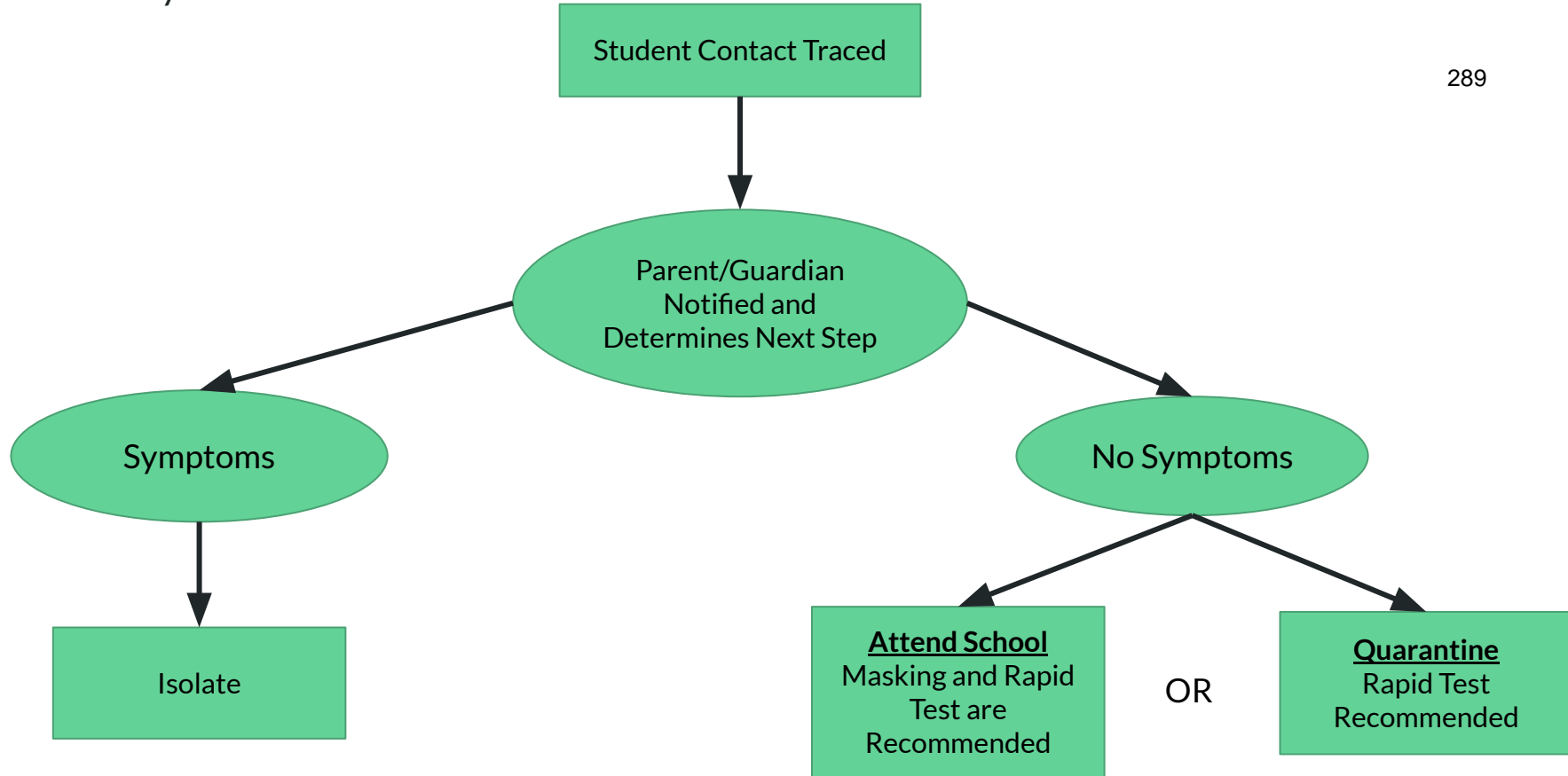
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Goal: Provide students with optimal in person learning opportunities. Continue contact tracing to provide families information and ability to make personal choice.

*Siblings of student identified as a positive case will follow district quarantine protocols.

*See parent/family flow chart on following slide.

Parent Family Flow Chart



D.C. EVEREST JUNIOR HIGH SCHOOL

1000 Machmueller Street
Weston, WI 54476

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MEMORANDUM

TO: Dr. Kristine Gilmore

FROM: Jason McFarlane 

DATE: November 8, 2021

SUBJECT: Spanish Immersion Camp

I am excited to once again present the opportunity for Spanish students from DC Everest to attend a full immersion Spanish camp during the 2021-2022 school year. Students from both the Junior and the Senior High will have the opportunity to attend Concordia Language Villages in Bemidji, MN for a weekend from Feb. 24-27. Concordia is the premier immersion camp experience in the country. Students will be immersed in Spanish language and culture for the entire weekend. This year's theme will focus on the ways in which Hispanics celebrate. I have attended this camp in the past with students and they can attest that they were transformed by the experience. They saw their communicative and interpretive abilities grow in the language.

The cost for the weekend will be **\$285 per student plus roughly \$100 per student for transportation** from school to Bemidji, MN. Jennifer Kindlarski will accompany students on the trip as well as another Spanish teacher and an additional parent chaperone, if needed. Jennifer Kindlarski will be coordinating fundraising and the details of the trip in conjunction with the directors at Concordia Language Villages.

I ask, Dr. Gilmore, that you bring this opportunity to the attention of the school board for approval.

Respectfully submitted,

Jennifer Kindlarski
Junior High Spanish Teacher



Book	Policy Manual
Section	First Reading by Board
Title	ETHICS AND CONFLICT OF INTEREST
Code	po1130
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 11, 2021
Prior Revised Dates	11/18/202

1130 - **ETHICS AND CONFLICT OF INTEREST**

The maintenance of unusually high standards of honesty, integrity, impartiality, and professional conduct by Board members and the District's administrative employees, officers, and agents is essential to ensure the proper performance of school business as well as to earn and keep public confidence in the School District.

For these reasons, the Board adopts the following guidelines to assure that conflicts of interest do not occur. These guidelines apply to all administrative employees, officers, and agents, including members of the Board. These guidelines are not intended to be all-inclusive, nor to substitute for good judgment on the part of all administrative employees, officers, and agents. Administrative employees are expected to perform their duties in an **ethical** manner **and** free from an actual conflict of interest or from situations that create the appearance of a conflict of interest, in a manner consistent with 19.59, Wis. Stats. The Board's interest in enforcing this policy is to assure that the decisions and actions of public employees retain the public's trust. Therefore, even a conflict relationship that can be viewed as beneficial to the District or that was intended to be beneficial to the District, may still be a violation of this policy.

- A. No administrative employee, officer, or agent shall engage in or have a **personal or** financial or other interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with his/her duties and responsibilities in the school system. **Specifically, administrative employees must perform their duties in a manner that does not violate criminal conflict of interest laws pursuant to 946.13, Wis. Stats. by having a private pecuniary interest in an amount that exceeds** ~~This includes not only those interests that violate state criminal law, which typically requires at least \$15,000 in a financial interest,~~ but also lesser valued conflicts that nonetheless create the appearance of using one's public position to secure a private **pecuniary interest and/or** benefit.
- B. Administrative employees, officers, and agents shall not engage in business, private practice of their profession, the rendering of services, **or anything of substantial value,** or the sale of goods of any type where advantage is taken of any professional relationship they may have with any student, client, or parents of such students or clients in the course of their employment or professional relationship with the School District.

Included, by way of illustration rather than limitation are the following:

1. the provision of any private lessons or services for a fee
2. soliciting on school premises or under circumstances which are coercive for the private sale of goods or services to students or other employees
3. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the employee's employment or through his/her access to School District records

4. the referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration for such referrals

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5. the requirement of students or clients to purchase any private goods or services provided by an employee or any business or professional practitioner with whom any employee has a financial relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations

- C. Should exceptions to this policy be necessary in order to provide mandatory services to students or clients of the School District, all such exceptions will be made known to the administrative employee's supervisor and will be disclosed to the Superintendent **before** entering into any private relationship.
- D. Administrative employees, officers, and agents shall not make use of materials, equipment, or facilities of the School District for their own personal financial gain or business interest. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.
- E. Administrative employees, officers, and agents cannot participate in the selection, award, or administration of a contract supported by a Federal grant/award if s/he has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer or agent, any member of his/her immediate family, his/her partner, or an organization that employs or is about to employ any of the parties described in this section, has a financial or other interest in, or a tangible personal benefit from, a firm considered for a contract.

Administrative employees, officers, and agents cannot solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

[X] However, pursuant to Federal rules, the School District has set standards for when an administrative employee, officer, or agent may accept a gift of an unsolicited item of nominal value. For purposes of this section, "nominal value" means that the gift has a monetary value of \$25 or less.

- F. **Administrative employees, officers, and agents must disclose any potential conflict of interest which may lead to a violation of this policy to the School District. Upon discovery of any potential conflict of interest, the School District will disclose, in writing, the potential conflict of interest to the appropriate Federal awarding agency or, if applicable, the pass-through entity.**

The District will also disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass-through entity.

- G. **Administrative employees, officers and agents found to be in violation of this conflict of interest policy will be subject to:**

[X] discipline in accordance with policy 3139.

- H. ~~To the extent that the School District has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the School District may not conduct a procurement action involving the parent, affiliate, or subsidiary organization if the School District is unable, or appears to be unable, to be impartial.~~
- I. ~~Administrative employees, officers, and agents must disclose any potential conflict of interest which may lead to a violation of this policy to the School District. Upon discovery of any potential conflict of interest, the School District will disclose, in writing, the potential conflict of interest to the appropriate Federal awarding agency or, if applicable, the pass through entity.~~
- J. ~~The District will also disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass through entity.~~

In the event that, within the course of administering a Federally funded grant program or service to the District, an administrative employee identifies a conflict of interest, a potential conflict of interest, or that the appearance of a conflict of interest may arise in the course of administering the Federal grant funds, the administrative employee must immediately notify either the Federal agency administering the grant in a manner consistent with that particular agencies rules on conflict of interests, or the District employee directly responsible for grant compliance. Such notice shall be provided at the earliest possible time.

It is a violation of this policy to take action or to refrain from taking action, or for an administrative employee to otherwise use his/her public position to obtain a financial gain or anything of substantial value for himself/herself or his/her immediate family, as defined in 19.42(7), Wis. Stats.

Legal	19.42(7), 19.59, 946.13, Wis. Stats. 2 C.F.R. 200.12, 2 C.F.R. 200.113, 2 C.F.R. 200.318 7 C.F.R. 3016.36(b)(3) and 7 C.F.R. 3019.42	293
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Last Modified by Ellen Suckow on November 11, 2021



Book	Policy Manual
Section	First Reading by Board
Title	DISTRICT-SPONSORED CLUBS AND ACTIVITIES
Code	po2430
Status	First Reading
Adopted	May 25, 2016
Last Revised	September 28, 2021
Prior Revised Dates	6/16/2021, 2/22/2021

2430 - **DISTRICT-SPONSORED CLUBS AND ACTIVITIES**

The Board believes that the goals and objectives of this District are best achieved by a diversity of learning experiences, including those that are not conducted in a regular classroom but are **directly** related to the **District's curriculum and/or mission**.

The purpose of **District-sponsored curricular-related** activities shall be to enable students to explore a wider range of individual interests than may be available in the District's courses of study but are still **directly** related to accomplishing the educational outcomes for students as adopted by the Board in Policy 2131. The Board encourages all students, including those students in elementary and middle school grades, to participate in such opportunities. In implementing this policy, the Superintendent shall take steps to make such opportunities accessible to all students.

For purposes of this policy, **District-sponsored curricular-related** activities are **typically defined as** those activities in which:

- A. the subject matter is actually taught or will be taught in a regularly offered course;
- B. the subject matter concerns the District's composite courses of study;
- C. participation is required for a particular course;
- D. participation results in academic credit; **or**;
- E. **the subject matter is of interest to students and aligns with the District's goals and mission.**

No **curricular-related** activity shall be considered to be under the sponsorship of this Board unless it meets one or more of the criteria stated above and has been approved by the Superintendent.

Such activities, along with **competitive co-curricular extra-curricular** activities/**athletics (not directly related to courses of study)**, may be conducted on or off school premises by clubs, associations, and organizations of students sponsored by the Board and directed by a staff advisor.

The Board shall allow nondistrict-sponsored, student clubs and activities during noninstructional time, in accordance with the provisions in Policy 5730 - Equal Access For Nondistrict-Sponsored, Student Clubs and Activities.

Non-District-sponsored Noncurricular, student activities that are initiated by parents or other members of the community may be allowed under the provisions of Policy 7510 - Use of District Facilities. The Board, however will not:

A. assume any responsibility for the planning, conducting, or evaluating of such activities;

B. provide any funds or other resources;

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C. allow any member of the District's staff to assist in the planning, conducting, or evaluating of such an activity during the hours s/he is functioning as a member of the staff.

No non-district-sponsored organization may use the name, logo, mascot, or any other name which would associate an activity with the District. Additionally, no non-district-sponsored organization may use the assets of the District, including but not limited to facilities, technology, or communication networks without the specific permission(s) as outlined in the relevant District policies.

Eligibility is determined by the rules in the D.C. Everest Athletics and Activities Handbook [and the Wisconsin Interscholastic Athletic Association](#).

Students shall be fully informed of the curricular-related activities available to them and of the eligibility standards established for participation in these activities. District-sponsored activities shall be available to all students who elect to participate and who meet eligibility standards.

The Superintendent shall prepare administrative guidelines to implement a program of ~~curricular related~~ clubs and activities. Such guidelines should ensure that the needs and interests of the students are properly assessed and procedures are established for continuing evaluation of each club and activity.

Whenever a student becomes a member of a District-established student group or national organization such as the National Honor Society, in order to remain a member, s/he must continue to meet all of the eligibility criteria and abide by the principles and practices established by the group or the organization.

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Legal 120.12(23), Wis. Stats.
P.L. 98-377

Cross References [ag2430 - DISTRICT-SPONSORED CLUBS AND ACTIVITIES](#)

Last Modified by Ellen Suckow on November 12, 2021



Book	Policy Manual
Section	First Reading by Board
Title	INTERSCHOLASTIC ATHLETICS
Code	po2431
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	9/15/2017

2431 - **INTERSCHOLASTIC ATHLETICS**

The ~~School~~ Board recognizes the value to the District and to the community of a program of interscholastic athletics for as many students as feasible and in accordance with Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity. The Board believes that it is the purpose of an interscholastic program to provide the benefits of an athletic experience to as large a number of student as feasible within the District.

The program of interscholastic athletics should provide students the opportunity to exercise and test their athletic abilities in a context greater and more varied than that which can be offered by a school or the School District alone.

The program should foster the growth of school loyalty with the student body as a whole and stimulate community interest in athletics.

Game activities and practice sessions should provide many opportunities to teach the values of competition and good sportsmanship.

Since the primary purpose of the athletic program is to enhance the education of participating students as indicated in this policy, the Board places top priority on maximum student participation and the values of good sportsmanship, team play, and fair competition, rather than on winning, particularly at sub-varsity levels. The Superintendent is to develop guidelines for coaches to follow which will ensure that as many students as possible have the opportunity to play so they have the opportunity to benefit from the learning experience.

The Board further adopts those eligibility standards set by the Constitution of the Wisconsin Interscholastic Athletic Association (WIAA) and shall review such standards annually to ascertain that they continue to be in conformity with the objectives of this Board.

The ~~District provides Superintendent shall develop appropriate administrative guidelines for the operation of the Athletic Program and a Code of Conduct for those who participate. Such guidelines should provide for~~ the following safeguards:

- A. Prior to enrolling in the sport,
 - 1. each participant shall submit to a thorough physical examination.
 - 2. parents shall report any past or current health problems along with a physician's statement that any such problems have or are being treated and pose no threat to the student's participation.
- B. Any student who is found to have a health condition which may be life-threatening to self or others shall not be allowed to participate until the situation has been analyzed by a physician that has determined the conditions under which the student may participate.

C. Any student who incurs an injury requiring a physician's care is to have written approval by a physician prior to the student's return to participation;

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D. (X) Any student suspected of having a head injury or concussion shall be provided with safety protocols specified in Policy 5340 - Student Accidents/Illness/Concussion.

In order to minimize health and safety risks to student-athletes and maintain ethical standards, school personnel, coaches, athletic trainers, and lay coaches should never dispense, supply, recommend, or permit the use of any drug, medication, or food supplement solely for performance-enhancing purposes.

The guidelines should also provide a set of behavioral expectations for each type of participant. The Superintendent or designee is authorized to implement suitable disciplinary procedures against those who violate these sportsmanship expectations.

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Legal 120.12(23), Wis. Stats.
P.I. 9.03(1)(h), Wis. Adm. Code

Cross References [ag2431 - INTERSCHOLASTIC ATHLETICS](#)

Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	SCHOOL PERFORMANCE AND STATE ACCOUNTABILITY REPORT CARDS
Code	po2700.01
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	11/18/2020, 2/27/2019

2700.01 - SCHOOL PERFORMANCE AND STATE ACCOUNTABILITY REPORT CARDS REPORTS

The Board believes that a vital component of the District's educational programs is ensuring that parents and other individuals are informed of the performance of the schools and the School District. To this end, the Board has adopted this policy.

~~State~~ School Performance Report (SPR)

The Board will publish an annual school and school district performance report including all information prescribed by statute. By January 1st of each year the Board shall notify the parents of each student enrolled in the District of the right to request a school and school district performance report. ~~Parents shall be notified that the performance report will be provided to the parent electronically unless the parent requests a written copy of the report. By May 1st, the Board shall distribute copies of the report to those who have requested, the report including, students enrolled in charter schools located in the District, that have requested the report.~~

Per the Wisconsin Department of Public Instruction, the District ~~shall~~ may use links to the [WISEdash Public Portal](#) to meet the electronic State School Performance Report requirements.

~~The annual school and School District report shall be made available on the District's internet website for public viewing. The report shall generally include the following information, as required or modified by the State Superintendent:~~

- A. ~~indicators of academic achievement, including the performance of students on Statewide assessment examinations by subject area~~
- B. ~~dropout, attendance, retention in grade and graduation rates~~
- C. ~~number of suspensions and expulsions, the reasons for, and duration of, the suspensions and expulsions, and the length of time students are expelled~~
- D. ~~staffing and financial data information~~
- E. ~~number and percentage of resident students attending a course in a nonresident district and the number and percentage of nonresident students attending a course in the district, and~~
- F. ~~method of reading instruction used in the District~~

Title I Provisions of the School/District Accountability Performance Report Card

In any year that the District receives Title I funding, its school/District accountability performance report card(s) must also include information regarding the delivery of Title I services as described in Policy 2261.03.

State Accountability Report Card ~~School Accountability Reports~~

A copy of each school's accountability report ~~s~~ **card as prepared by the Wisconsin Department of Public Instruction** shall be provided ²⁰⁰ to the parent of each student enrolled in or attending the school ~~and the ranking levels for each school within the District shall be provided to all parents~~ on an annual basis. **The report shall be sent simultaneously with the notice required in Policy 8146 - Notification of Educational Options.**

~~Revised 1/25/17~~

~~Revised 2/27/19~~

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Legal 115.385, Wis. Stats.
 115.38, Wis. Stats.
 20 U.S.C. 6311

Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	EMPLOYMENT OF PROFESSIONAL STAFF
Code	po3120
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 8, 2021
Prior Revised Dates	6/17/2019

3120 - **EMPLOYMENT OF PROFESSIONAL STAFF**

The Board recognizes that it is vital to the successful operation of the District that positions created by the Board be filled with highly-qualified and competent personnel.

All employees other than the Superintendent or support staff members (Policy 0100 – Definitions) are considered professional employees.

In addition, certain categories of staff employed in a professional capacity, such as network manager, but not requiring a license or certification, are considered professional staff. The compensation and benefits for such positions shall be established by the Superintendent.

The Board shall approve the employment, fix the compensation, and establish the term of employment for each professional staff member employed by this District. Teachers may only be employed by contract, and full-time teachers may only be employed following a majority vote of the full membership of the Board or as required or permitted by law. The Board shall approve the employment of any employee required by law to be employed only following the majority vote of the full membership of the Board.

Such approval shall be given only to those candidates for employment recommended by the Superintendent.

All applications for employment shall be referred to the Human Resources Department.

When any recommended candidate has been rejected by the Board, the Superintendent shall make a substitute recommendation. All applications for employment shall be referred to the Human Resources Department.

Relatives of Board members may be employed by the Board, provided the Board member does not participate in any way in the discussion or vote on any matter related to said employment.

Relatives of staff members may be employed by the Board, however, arrangements should be made so that the staff member being employed is not placed in a position in which s/he would be supervised directly by or supervise directly the relative staff member.

Any professional staff member's intentional misstatement of fact material to his/her qualifications for employment or the determination of salary shall be considered by this Board to constitute grounds for dismissal.

The employment of professional staff members prior to approval by the Board is authorized when their employment is required to maintain continuity in the educational program, except as prohibited by law, including the employment of full-time teachers and certain administrative employees on a substitute basis, pending Board approval. Employment shall be recommended to the Board at the next regular meeting.

No candidate for employment to the professional staff shall receive a recommendation for such employment without having provided visual evidence of proper certification or that application for such certification is in process.

For those staff members who will be instructing children in reading and/or language arts pre-school and/or grades kindergarten through sixth grade, their certificate must verify successful completion of the instruction that includes the teaching of phonics. 301

There must also be verification that a satisfactory background check has been conducted by the Department of Public Instruction or appropriate State agency.

The Superintendent shall prepare procedures for the recruitment and selection of all professional staff which includes reporting newly hired employees to the Wisconsin Department of Workforce Development.

DISTRICT SUPPORTED ALTERNATIVE LICENSING PROGRAMS

As part of the Board's efforts to provide the highest quality education for all students in all subject areas, the Board authorizes the Superintendent, where appropriate, to support teacher licensure opportunities.

EXPERIENCED-BASED LICENSURE FOR TECHNICAL AND VOCATIONAL EDUCATION

"Technical education" means technology education and any technology related occupation

"Vocational education" means agriculture, child services, clothing services, food services, housing and equipment services, family and consumer education, family and consumer services, home economic-related occupations, health care related occupations, trade specialist, business education, business and office, and marketing education as defined by DPI

The Superintendent may support the application for an experience-based license for a teacher to teach in a technical and/or vocational education field, provided that the individual can be credited with at least 100 points using the following system:

A. The following points for experience in a technical field (must comprise at least twenty-five (25) of the required 100 points):

1. For a bachelor's degree in any science, technology, engineering, or mathematics field and any teaching license or permit, or in a field related to the vocational subject, 100 points.
2. For a bachelor's degree in any science, technology, engineering, or mathematics field, or in a field related to the vocational subject seventy-five (75) points.
3. For a bachelor's degree in a field other than those described in numbers 1 and 2 above, sixty-five (65) points.
4. For industry or vocational certification, ninety (90) points.
5. For industry experience in a trade or technical field or vocation, five (5) points per forty (40) hours worked up to a maximum of ninety (90) points.
6. For an internship in a trade or technical field or in the vocation, twenty-five (25) points.
7. For being mentored in a trade or technical skill or in the vocation by a colleague or a Wisconsin Technology Education Association or a recognized vocational association approved mentor, twenty-five (25) points.
8. For an apprenticeship in a trade or technical field or in the vocation, five (5) points per forty (40) hours worked up to a maximum of ninety (90) points.

B. The following points for pedagogical experience (must be at least twenty-five (25) out of the 100 required points):

1. For a bachelor's degree in technical or technology education, 100 points.
2. For a bachelor's degree in a field other than any science, technology, engineering, mathematics, or technical or technology education field, or in a subject related to the vocation and any teaching license or permit, seventy-five (75) points.
3. For credit earned at an accredited institution of higher education or technical college, three (3) points per credit up to a maximum of seventy-five (75) points for technical or technology education courses and science, technology, engineering, or mathematics courses or any field related to the vocation and three (3) points per credit up to a maximum of seventy-five (75) points for education and pedagogical courses.

4. For completing at least 100 hours of training in pedagogy, five (5) points per fifty (50) hours up to a maximum of seventy-five (75) points.

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Individuals who have sufficient points may be employed by the District under an experience-based license provided that the Superintendent implements a professional development curriculum for the teacher to follow during the three (3) year period of the initial license. The Superintendent shall monitor the teacher's progress in fulfilling the curriculum.

PROFESSIONAL TEACHING PERMIT

The Superintendent may support the teaching license application of an individual to teach a course in engineering, mathematics, science, computer science, art, music, or world languages that do not yet hold a professional teacher license provided that the following criteria are met:

- A. The District is experiencing a shortage in the availability of teachers with professional teaching certification in the subject area and is unable to fill a position with an acceptable licensed teacher.
- B. The individual holds at least a bachelor's degree in engineering, mathematics, science, computer science, art, music, or world languages.
- C. The individual possesses at least five (5) years of verifiable industry experience in the same field as the bachelor's degree.
- D. The individual has completed at least 100 hours of pedagogical training in an alternative teacher licensing program approved by DPI.
- E. The Superintendent shall implement a plan to provide supervision of the teacher by a teacher that holds regular professional teaching licensure during the two (2) year period of the permit.
- F. The hiring of the teacher under this alternative licensure program will not displace a regularly licensed teacher in the District.

~~Revised 11/28/18~~

~~Reviewed 6/17/19~~

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Legal 118.191, 118.192, 118.21, 118.22(2), 118.24, 121.02, Wis. Stats.
Wis. Admin. Code P.I. 34

Last Modified by Ellen Suckow on November 9, 2021



Book	Policy Manual
Section	First Reading by Board
Title	USE OF TOBACCO AND NICOTINE BY PROFESSIONAL STAFF
Code	po3215
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	1/20/2021

3215 - **USE OF TOBACCO AND NICOTINE BY PROFESSIONAL STAFF**

The Board recognizes that the use of tobacco products, as well as other nicotine delivery systems, such as electronic smoking devices, are a health, safety, and environmental hazard for students, staff, visitors, and school facilities. The Board is acutely aware of the serious health risks associated with the use of these products, both to users and non-users, and that their use or promotion on school grounds and at off-campus school-sponsored events is detrimental to the health and safety of students, staff, and visitors. The Board also believes accepting tobacco industry gifts or materials will send an inconsistent message to students, staff, and visitors.

It shall be a violation of this policy for any professional staff of the District to use, consume, display, promote, or sell any tobacco products, tobacco industry brand, tobacco-related devices, imitation tobacco products, or electronic smoking or vaping devices, regardless of content at any time on school property or at off-campus, school-sponsored events.

It shall be a violation of this policy for the District to solicit or accept any contributions, gifts, money, curricula, or materials from the tobacco industry or from any tobacco products retailer. This includes, but is not limited to, donations, monies for sponsorship, advertising, promotions, loans, or support for equipment, uniforms, and sports and/or training facilities. It shall be a violation of this policy to participate in any type of service funded by the tobacco industry while in the scope of employment for the District.

Exceptions

It shall not be a violation of this policy for tobacco products, tobacco-related devices, imitation tobacco products, or lighters to be included in instructional or work-related activities in school buildings if the activity is conducted by a staff member or an approved visitor and the activity does not include smoking, chewing, or otherwise ingesting the product.

FDA approved cessation products or tobacco dependence products are exempt from this policy for adults and staff eighteen (18) years and older. Staff using such products and bringing them to any school property or school-sponsored activity are responsible for safekeeping of these products at all times and are responsible for assuring that no students are able to obtain access to these products.

Instruction in the history and purpose of traditional tobacco that has been used as a part of faith and tradition in the Native American and American Indian communities is an exception to this policy.

Policy Specific Definitions

The term "any time" means during normal school and non-school hours: twenty-four (24) hours a day, seven (7) days a week.

The term "electronic smoking device" means any product containing or delivering nicotine, or any other substance, whether natural or synthetic, intended for human consumption through the inhalation of aerosol or vapor from the product. The term electronic smoking device includes, but is not limited to, devices manufactured, marketed, or sold as e-cigarettes, e-cigars, e-pipes, vape pens, mods, tank systems, JUUL, or under any other product name or descriptor. The term electronic smoking device includes any

component part of a product, whether or not marketed or sold separately, including but not limited to e-liquids, e-juice, cartridges, and pods.

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The term "imitation tobacco product" means any edible non-tobacco product designed to resemble a tobacco product, or non-edible, non-tobacco product designed to resemble a tobacco product that is intended to be used by children as a toy. Examples of imitation tobacco products include but are not limited to: candy or chocolate cigarettes, bubble gum cigars, shredded bubble gum resembling chewing tobacco, pouches containing flavored substances packaged similar to snuff, shredded beef jerky in containers resembling snuff tins, plastic cigars, and puff cigarettes.

The term "off-campus, school-sponsored event" means any event sponsored by the school or School District that is not on school property, including but not limited to, sporting events, day camps, field trips, entertainment seminars, dances or theatrical productions.

The term "school property" means all facilities and property, including land, whether owned, rented, or leased by the District, and all vehicles owned, leased, rented, contracted for, or controlled by the District used for transported students, staff, and visitors.

The term "smoking" means inhaling, exhaling, burning, or carrying any lighted or heated cigar, cigarette or pipe, or any other lighted or heated product containing, made, or derived from nicotine, tobacco, marijuana, or other plant, whether natural or synthetic, that is intended for inhalation. "Smoking" also includes carrying or using an activated electronic smoking device.

The term "tobacco products retailer" means retailers whose primary business is to sell tobacco and/or tobacco-related products.

The term "tobacco industry" means manufacturers, distributors, or wholesalers of tobacco products, electronic smoking devices, or tobacco-related devices; this includes parent companies and subsidiaries.

The term "tobacco industry brand" means any corporate name, trademark, logo, symbol, motto, selling message, recognizable pattern of colors, or any other indication of product identification identical or similar to those used for any brand of tobacco product, company, or manufacturer of tobacco products.

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Legal	111.321, Wis. Stats.
	120.12(20), Wis. Stats.
	20 U.S.C. 6081 et seq.
	20 U.S.C. 7182

Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	STAFF DRESS AND GROOMING
Code	po3216
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021

3216 - STAFF DRESS AND GROOMING

The Board ~~of Education~~ believes that professional staff members set an example in dress and grooming for their students to follow. ~~A professional staff member who understands this precept and adheres to it enlarges the importance of his/her task, presents an image of dignity, and encourages respect for authority. These factors act in a positive manner toward the maintenance of discipline.~~

The Board authorizes the development of standards for staff dress and grooming that promote a professional educational atmosphere that gives consideration to the impact on the educational process and the diversity of the District's staff.

~~The Board retains the authority to specify the following dress and grooming guidelines for staff that will prevent such matters from having an adverse impact on the educational process.~~ When assigned to District duty, all professional staff members shall:

- A. be physically clean and, neat, ~~and well groomed~~;
- B. dress in a manner consistent with their professional responsibilities;
- C. dress in a manner that communicates to students a pride in personal appearance;
- D. [X] be groomed in such a way that does not disrupt the educational process nor cause a health or safety hazard.

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Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	ETHICS AND CONFLICT OF INTEREST
Code	po3230
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 11, 2021
Prior Revised Dates	11/18/202

~~3230~~1130 - ETHICS AND CONFLICT OF INTEREST

The maintenance of unusually high standards of honesty, integrity, impartiality, and professional conduct by Board members and the District's employees, officers, and agents is essential to ensure the proper performance of school business as well as to earn and keep public confidence in the School District.

For these reasons, the Board adopts the following guidelines to assure that conflicts of interest do not occur. These guidelines apply to all administrative employees, officers, and agents, including members of the Board. These guidelines are not intended to be all-inclusive, nor to substitute for good judgment on the part of all professional employees, officers, and agents. Professional employees are expected to perform their duties in an ethical manner and free from an actual conflict of interest or from situations that create the appearance of a conflict of interest, in a manner consistent with 19.59, Wis. Stats. The Board's interest in enforcing this policy is to assure that the decisions and actions of public employees retain the public's trust. Therefore, even a conflict relationship that can be viewed as beneficial to the District or that was intended to be beneficial to the District, may still be a violation of this policy.

- A. No professional employee, officer, or agent shall engage in or have a personal or financial or other interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with his/her duties and responsibilities in the school system. Specifically, professional employees must perform their duties in a manner that does not violate criminal conflict of interest laws pursuant to 946.13, Wis. Stats. by having a private pecuniary interest in an amount that exceeds ~~This includes not only those interests that violate state criminal law, which typically requires at least \$15,000 in a financial interest,~~ but also lesser valued conflicts that nonetheless create the appearance of using one's public position to secure a private pecuniary interest and/or benefit.
- B. Professional employees, officers, and agents shall not engage in business, private practice of their profession, the rendering of services, or anything of substantial value, or the sale of goods of any type where advantage is taken of any professional relationship they may have with any student, client, or parents of such students or clients in the course of their employment or professional relationship with the School District.

Included, by way of illustration rather than limitation are the following:

1. the provision of any private lessons or services for a fee;
2. soliciting on school premises or under circumstances which are coercive for the private sale of goods or services to students or other employees;
3. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the employee's employment or through his/her access to School District records;

4. the referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration for such referrals;
5. the requirement of students or clients to purchase any private goods or services provided by an employee or any business or professional practitioner with whom any employee has a financial relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.

- C. Should exceptions to this policy be necessary in order to provide mandatory services to students or clients of the School District, all such exceptions will be made known to the employee's supervisor and will be disclosed to the Superintendent **before** entering into any private relationship.
- D. Professional employees, officers, and agents shall not make use of materials, equipment, or facilities of the School District for their own personal financial gain or business interest. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.
- E. Professional employees, officers, and agents cannot participate in the selection, award, or administration of a contract supported by a Federal grant/award if s/he has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer or agent, any member of his/her immediate family, his/her partner, or an organization that employs or is about to employ any of the parties described in this section, has a financial or other interest in, or a tangible personal benefit from, a firm considered for a contract.

Professional employees, officers, and agents cannot solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

[X] However, pursuant to Federal rules, the School District has set standards for when an employee, officer, or agent may accept a gift of an unsolicited item of nominal value. For purposes of this section, "nominal value" means that the gift has a monetary value of \$25 or less.

- F. Professional employees, officers, and agents must disclose any potential conflict of interest which may lead to a violation of this policy to the School District. Upon discovery of any potential conflict of interest, the School District will disclose, in writing, the potential conflict of interest to the appropriate Federal awarding agency or, if applicable, the pass-through entity.
- G. The District will also disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass-through entity.
- H. Professional employees, officers and agents found to be in violation of this conflict of interest policy will be subject to [X] discipline in accordance with policy 3139.

[X] No professional staff employee may accept or engage in any employment, consulting, advising, or other professional activity with any organization other than the District, whether the employee will receive compensation for such outside activity or not, without first providing notice to the Superintendent, or in the case of the Superintendent, such notice must be provided to the Board.

- A. ~~To the extent that the School District has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the School District may not conduct a procurement action involving the parent, affiliate, or subsidiary organization if the School District is unable, or appears to be unable, to be impartial.~~
- B. ~~Administrative employees, officers, and agents must disclose any potential conflict of interest which may lead to a violation of this policy to the School District. Upon discovery of any potential conflict of interest, the School District will disclose, in writing, the potential conflict of interest to the appropriate Federal awarding agency or, if applicable, the pass through entity.~~
- C. ~~The District will also disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass through entity.~~

In the event that, within the course of administering a Federally funded grant program or service to the District, an employee identifies a conflict of interest, a potential conflict of interest, or that the appearance of a conflict of interest may arise in the course of administering the Federal grant funds, the administrative employee must immediately notify either the Federal agency administering the grant in a manner consistent with that particular agencies rules on conflict of interests, or the District employee directly responsible for grant compliance. Such notice shall be provided at the earliest possible time.



Book	Policy Manual
Section	First Reading by Board
Title	EMPLOYMENT OF SUBSTITUTES
Code	po4120.04
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021

4120.04 - **EMPLOYMENT OF SUBSTITUTES**

The ~~School~~ Board recognizes its responsibility to procure the services of substitute support staff in order to prevent the interruption of the operation of the schools.

Substitutes will receive in June a letter of reasonable assurance of continued employment.

The names of potential substitute personnel and the positions in which they may substitute shall be maintained by the Human Resources Department.

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Legal	118.19, Wis. Stats. P.I. 3.03(8), Wis. Adm. Code
Cross References	ag4120.04 - EMPLOYMENT OF SUBSTITUTE SUPPORT STAFF

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Book	Policy Manual
Section	First Reading by Board
Title	UNREQUESTED LEAVES OF ABSENCE/FITNESS FOR DUTY
Code	po4161
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	11/18/2020, 2/22/2017

4161 - UNREQUESTED LEAVES OF ABSENCE/FITNESS FOR DUTY

It is the policy of the Board to protect the students and employees of this District from the effects of contagious diseases and other circumstances that render support staff members unable to perform their duties.

The Board authorizes the Superintendent to place a support staff member on sick leave or suspend a support staff member for physical or mental disability to perform assigned duties in conformance with the law.

The Superintendent shall require that the support staff member submit to an appropriate examination by a healthcare provider designated by the support staff member, a healthcare provider designated by the Board and compensated by the District, or both.

The staff member will be required to execute a release that complies with the requirements of the Health Insurance Portability and Accountability Act (HIPAA) in order to allow the report of the medical examination to be released to the Board/Superintendent and to allow the Superintendent to speak to the health care provider who conducted the medical examination in order to get clarification. Refusal to submit to an appropriate examination or to execute the HIPAA release will be grounds for disciplinary action, up to and including termination.

As required by Federal law and regulation and Board Policy 4122.02, the Superintendent shall direct the provider designated by the Board to conduct the examination not to collect genetic information or provide any genetic information, including the individual’s family medical history, in the report of the medical examination.

Pursuant to State law and in accordance with the Americans with Disabilities Act, as amended (ADA) and the Genetic Information Nondiscrimination Act (GINA), the results of any such examination shall be treated as a confidential medical record and will be exempt from release, except as provided by law. If the District inadvertently receives genetic information about an individual who is required to submit to an appropriate examination from the medical provider, it shall be treated as a confidential medical record as required by the ADA.

If, as a result of his/her such examination, the support staff member is found to be unfit to perform assigned duties, the support staff member shall be placed on leave with such compensation to which s/he is entitled pending further determination of ability to perform duties, including evaluation of any reasonable accommodations in the event of the existence of a disability.

Should a support staff member refuse to submit to the examination requested by the Superintendent, such refusal shall subject the support staff member to disciplinary action. ~~following the exhaustion of proper appeals, the Superintendent shall consider the certification of charges for reasons of insubordination.~~

The Superintendent may designate any period of leave under this policy as qualifying leave under State and/or Federal FMLA leave entitlement consistent with Policy 4430.01 as provided by law.

~~Revised 2/22/17~~

Legal

- 111.32 et seq. the Wisconsin Fair Employment Act
- 29 C.F.R. Part 1630
- 29 C.F.R. Part 1635
- 42 U.S.C. 12101 et seq., Americans with Disabilities Act of 1990, as amended
- 42 U.S.C. 2000ff et seq., The Genetic Information Nondiscrimination Act

Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	USE OF TOBACCO AND NICOTINE BY SUPPORT STAFF
Code	po4215
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	1/20/2021

4215 - **USE OF TOBACCO AND NICOTINE BY SUPPORT STAFF**

The Board recognizes that the use of tobacco products, as well as other nicotine delivery systems, such as electronic smoking devices, are a health, safety, and environmental hazard for students, staff, visitors, and school facilities. The Board is acutely aware of the serious health risks associated with the use of these products, both to users and non-users, and that their use or promotion on school grounds and at off-campus school-sponsored events is detrimental to the health and safety of students, staff, and visitors. The Board also believes accepting tobacco industry gifts or materials will send an inconsistent message to students, staff, and visitors.

It shall be a violation of this policy for any support staff of the District to use, consume, display, promote, or sell any tobacco products, tobacco industry brand, tobacco-related devices, imitation tobacco products, or electronic smoking or vaping devices, regardless of content at any time on school property or at off-campus, school-sponsored events.

It shall be a violation of this policy for the District to solicit or accept any contributions, gifts, money, curricula, or materials from the tobacco industry or from any tobacco products retailer. This includes, but is not limited to, donations, monies for sponsorship, advertising, promotions, loans, or support for equipment, uniforms, and sports and/or training facilities. It shall be a violation of this policy to participate in any type of service funded by the tobacco industry while in the scope of employment for the District.

Exceptions

It shall not be a violation of this policy for tobacco products, tobacco-related devices, imitation tobacco products, or lighters to be included in instructional or work-related activities in school buildings if the activity is conducted by a staff member or an approved visitor and the activity does not include smoking, chewing, or otherwise ingesting the product.

FDA approved cessation products or tobacco dependence products are exempt from this policy for adults and staff eighteen (18) years and older. Staff using such products and bringing them to any school property or school-sponsored activity are responsible for safekeeping of these products at all times and are responsible for assuring that no students are able to obtain access to these products.

Instruction in the history and purpose of traditional tobacco that has been used as a part of faith and tradition in the Native American and American Indian communities is an exception to this policy.

Policy Specific Definitions

The term "any time" means during normal school and non-school hours: twenty-four (24) hours a day, seven (7) days a week.

The term "electronic smoking device" means any product containing or delivering nicotine, or any other substance, whether natural or synthetic, intended for human consumption through the inhalation of aerosol or vapor from the product. The term electronic smoking device includes, but is not limited to, devices manufactured, marketed, or sold as e-cigarettes, e-cigars, e-pipes, vape pens, mods, tank systems, JUUL, or under any other product name or descriptor. The term electronic smoking device includes any

component part of a product, whether or not marketed or sold separately, including but not limited to e-liquids, e-juice, cartridges, and pods.

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The term "imitation tobacco product" means any edible non-tobacco product designed to resemble a tobacco product, or non-edible, non-tobacco product designed to resemble a tobacco product that is intended to be used by children as a toy. Examples of imitation tobacco products include but are not limited to: candy or chocolate cigarettes, bubble gum cigars, shredded bubble gum resembling chewing tobacco, pouches containing flavored substances packaged similar to snuff, shredded beef jerky in containers resembling snuff tins, plastic cigars, and puff cigarettes.

The term "off-campus, school-sponsored event" means any event sponsored by the school or School District that is not on school property, including but not limited to, sporting events, day camps, field trips, entertainment seminars, dances, or theatrical productions.

The term "school property" means all facilities and property, including land, whether owned, rented, or leased by the District, and all vehicles owned, leased, rented, contracted for, or controlled by the District used for transported students, staff and visitors.

The term "smoking" means inhaling, exhaling, burning, or carrying any lighted or heated cigar, cigarette or pipe, or any other lighted or heated product containing, made, or derived from nicotine, tobacco, marijuana, or other plant, whether natural or synthetic, that is intended for inhalation. "Smoking" also includes carrying or using an activated electronic smoking device.

The term "tobacco products retailer" means retailers whose primary business is to sell tobacco and/or tobacco-related products.

The term "tobacco industry" means manufacturers, distributors or wholesalers of tobacco products, electronic smoking devices, or tobacco-related devices; this includes parent companies and subsidiaries.

The term "tobacco industry brand" means any corporate name, trademark, logo, symbol, motto, selling message, recognizable pattern of colors, or any other indication of product identification identical or similar to those used for any brand of tobacco product, company, or manufacturer of tobacco products.

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Legal 111.321, Wis. Stats.
 120.12(20), Wis. Stats.
 20 U.S.C. 6081 et seq.
 20 U.S.C. 7182

Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	SUPPORT STAFF DRESS AND GROOMING
Code	po4216
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021

4216 - **SUPPORT STAFF DRESS AND GROOMING**

The ~~School~~ Board believes that support staff members set an example in dress and grooming for their students to follow. ~~are an important and integral part of the District. Also, since the support staff is highly visible staff to the students, the professional staff, and the public, the Board believes the support staff should at all times be well dressed and groomed. Support staff members who understand this precept and adhere to it enlarge the importance of their task, present an image of dignity, and encourage respect.~~

The Board authorizes the development of standards for staff dress and grooming that promote a professional educational atmosphere that gives consideration to the impact on the educational process and the diversity of District's staff.

~~The Board retains the authority to specify the following dress and grooming guidelines for support staff.~~ When assigned to District duty, all support staff members shall:

- A. be physically clean, and neat, ~~and well groomed~~;
- B. dress in a manner consistent with their support responsibilities;
- C. dress in a manner that communicates to others a pride in personal appearance;
- D. dress in a manner that does not cause damage to District property.
- E. [X] be groomed in such a way that does not disrupt the educational process or cause a health or safety hazard.

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Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	ETHICS AND CONFLICT OF INTEREST
Code	po4230
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 12, 2021
Prior Revised Dates	11/18/202

42430 - ETHICS AND CONFLICT OF INTEREST

The maintenance of unusually high standards of honesty, integrity, impartiality, and support conduct by Board members and the District's employees, officers, and agents is essential to ensure the proper performance of school business as well as to earn and keep public confidence in the School District.

For these reasons, the Board adopts the following guidelines to assure that conflicts of interest do not occur. These guidelines apply to all administrative employees, officers, and agents, including members of the Board. These guidelines are not intended to be all-inclusive, nor to substitute for good judgment on the part of all support employees, officers, and agents. support employees are expected to perform their duties in an ethical manner and free from an actual conflict of interest or from situations that create the appearance of a conflict of interest, in a manner consistent with 19.59, Wis. Stats. The Board's interest in enforcing this policy is to assure that the decisions and actions of public employees retain the public's trust. Therefore, even a conflict relationship that can be viewed as beneficial to the District or that was intended to be beneficial to the District, may still be a violation of this policy.

- A. No support employee, officer, or agent shall engage in or have a personal or financial or other interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with his/her duties and responsibilities in the school system. Specifically, support employees must perform their duties in a manner that does not violate criminal conflict of interest laws pursuant to 946.13, Wis. Stats. by having a private pecuniary interest in an amount that exceeds ~~This includes not only those interests that violate state criminal law, which typically requires at least \$15,000 in a financial interest,~~ but also lesser valued conflicts that nonetheless create the appearance of using one's public position to secure a private pecuniary interest and/or benefit.
- B. Support employees, officers, and agents shall not engage in business, private practice of their profession, the rendering of services, or anything of substantial value, or the sale of goods of any type where advantage is taken of any professional relationship they may have with any student, client, or parents of such students or clients in the course of their employment or support relationship with the School District.

Included, by way of illustration rather than limitation are the following:

1. the provision of any private lessons or services for a fee;
2. soliciting on school premises or under circumstances which are coercive for the private sale of goods or services to students or other employees;
3. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the employee's employment or through his/her access to School District records;

4. the referral of any student or client for lessons or services to any private business or support practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration for such referrals;
 5. the requirement of students or clients to purchase any private goods or services provided by an employee or any business or support practitioner with whom any employee has a financial relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.
- C. Should exceptions to this policy be necessary in order to provide mandatory services to students or clients of the School District, all such exceptions will be made known to the employee's supervisor and will be disclosed to the ~~Superintendent~~ **Superintendent before** entering into any private relationship.
- D. Support employees, officers, and agents shall not make use of materials, equipment, or facilities of the School District for their own personal financial gain or business interest. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.
- E. Support employees, officers, and agents cannot participate in the selection, award, or administration of a contract supported by a Federal grant/award if s/he has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer or agent, any member of his/her immediate family, his/her partner, or an organization that employs or is about to employ any of the parties described in this section, has a financial or other interest in, or a tangible personal benefit from, a firm considered for a contract.

Support employees, officers, and agents cannot solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

[X] However, pursuant to Federal rules, the School District has set standards for when an employee, officer, or agent may accept a gift of an unsolicited item of nominal value. For purposes of this section, "nominal value" means that the gift has a monetary value of \$25 or less.

- F. Support employees, officers, and agents must disclose any potential conflict of interest which may lead to a violation of this policy to the School District. Upon discovery of any potential conflict of interest, the School District will disclose, in writing, the potential conflict of interest to the appropriate Federal awarding agency or, if applicable, the pass-through entity.

The District will also disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass-through entity.

- G. Support employees, officers, and agents found to be in violation of this conflict of interest policy will be subject to [X] discipline in accordance with policy 3139.

[X] No support staff employee may accept or engage in any employment, consulting, advising, or other support activity with any organization other than the District, whether the employee will receive compensation for such outside activity or not, without first providing notice to the Superintendent, or in the case of the Superintendent, such notice must be provided to the Board.

- A. ~~To the extent that the School District has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the School District may not conduct a procurement action involving the parent, affiliate, or subsidiary organization if the School District is unable, or appears to be unable, to be impartial.~~
- B. ~~Administrative employees, officers, and agents must disclose any potential conflict of interest which may lead to a violation of this policy to the School District. Upon discovery of any potential conflict of interest, the School District will disclose, in writing, the potential conflict of interest to the appropriate Federal awarding agency or, if applicable, the pass-through entity.~~
- C. ~~The District will also disclose, in a timely manner, all violations of Federal criminal law involving fraud, bribery, or gratuity that affect a Federal award to the appropriate Federal awarding agency or, if applicable, the pass-through entity.~~

In the event that, within the course of administering a Federally funded grant program or service to the District, an employee identifies a conflict of interest, a potential conflict of interest, or that the appearance of a conflict of interest may arise in the course of administering the Federal grant funds, the administrative employee must immediately notify either the Federal agency administering the grant in a manner consistent with that particular agencies rules on conflict of interests, or the District employee directly responsible for grant compliance. Such notice shall be provided at the earliest possible time.

It is a violation of this policy to take action or to refrain from taking action, or for an employee to otherwise use his/her public position to obtain a financial gain or anything of substantial value for himself/herself or his/her immediate family, as defined in 19.42(7), Wis. Stats. 317

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Legal 19.42(7), 19.59, 946.13, Wis. Stats.
 2 C.F.R. 200.12, 2 C.F.R. 200.113, 2 C.F.R. 200.318
 7 C.F.R. 3016.36(b)(3) and 7 C.F.R. 3019.42

Last Modified by Ellen Suckow on November 12, 2021



Book	Policy Manual
Section	First Reading by Board
Title	ENTRANCE AGE
Code	po5112
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	11/20/2019

5112 - **ENTRANCE AGE**

The Board shall establish student entrance age requirements which are consistent with Wisconsin Law and sound educational practice and which ensure equitable treatment.

A. Kindergarten

1. A child is eligible for entrance into four (4) year old kindergarten if s/he attains the age of four (4) on or before September 1st of the year in which s/he applies for entrance and meets the residency requirements.
2. A child is eligible for five (5) year old kindergarten when s/he attains the age of five (5) on or before September 1st of the year in which s/he applies for entrance and meets the residency requirements. The child may not be placed in an alternative program without the permission of the parent.

B. First Grade

A child must be six (6) years of age on or before September 1st in the year in which s/he enrolls. A student must have completed a kindergarten program or must receive a waiver of this requirement.

Any student who has not completed a five (5) year old kindergarten program, but seeks to enroll in first grade must receive a waiver of the requirement. The following students are eligible to receive a waiver:

1. Any student who has moved to the District from another state or country where completion of a five (5) year old kindergarten program is a prerequisite to enrollment in first grade and that student has received a waiver of the requirement in his or her prior state or country.
2. Any student who has moved to the District from another state or country that does not require the completion of five (5) year old kindergarten prior to enrollment in first grade.
3. Any student who, at the discretion of the building principal, in consultation with the first grade teacher(s) and or school psychologist of the District, determines that, notwithstanding that the student has not completed a five (5) year old kindergarten program, the student has demonstrated sufficient aptitude in all core competencies normally required of kindergarten students in the District upon completion of the kindergarten program.

The Principal and/or school psychologist shall perform any required testing to establish the student's academic capabilities and shall prepare a written evaluation that either grants or denies the waiver and provides an explanation as to the decision.

C. Appeal of Denial of Waiver

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The parents of any student denied a waiver under this section by the building principal may appeal that decision to the Superintendent by submitting a written request to the Administrator within ten (10) calendar days of the decision of the principal.

The decision of the Superintendent is final.

D. Initial Entry

Children entering the District for the first time must comply with State law. Students must have an immunization record on file at the school. Any student who does not have the proper immunization shall be excluded or permitted to remain in school pursuant to Policy 5320.

~~A child may be exempt from the required health immunizations upon written request of the parent of such child stating the objection to immunization on religious grounds, personal conviction, or for medical reasons certified by a competent medical authority.~~

[X] Any student, and/or his/her parent(s), who enters the District for the first time must disclose prior or pending school expulsions at the time of enrollment.

E. Verification of Residence

Verification of a parent's residence shall be required at the time the child registers in a District school. Verification of residence may also be required at any other time at the discretion of the Superintendent.

F. Notification of *In Loco Parentis*

In cases in which a student is temporarily not residing with his/her parents for a short period of time, the parent of the student shall designate in writing that adult person with whom the student resides who stands *in loco parentis* to the student in order for him/her to be admitted or continue in school. This statement shall be notarized and presented to the principal.

G. Early Admission

The District shall prescribe procedures, conditions, and standards for early admission to kindergarten and first grade.

The District does not allow early entrance to four (4) year old kindergarten.

H. Older Students

A person who is resident of the District and over twenty (20) years of age may enroll providing the Superintendent does not think his/her enrollment will interfere with the education of the other students.

~~Revised 6/26/19~~

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Legal Wis. Stats 118.14, 118.15, 120.12(25)

Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	USE OF TOBACCO AND NICOTINE BY STUDENTS
Code	po5512
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	1/20/2021, 2/27/2019

5512 - **USE OF TOBACCO AND NICOTINE BY STUDENTS**

The Board recognizes that the use of tobacco products, as well as other nicotine delivery systems, such as electronic smoking devices, are a health, safety, and environmental hazard for students, staff, visitors, and school facilities. The Board is acutely aware of the serious health risks associated with the use of these products, both to users and non-users, and that their use or promotion on school grounds and at off-campus school-sponsored events is detrimental to the health and safety of students, staff, and visitors. The Board also believes accepting tobacco industry gifts or materials will send an inconsistent message to students, staff, and visitors.

It shall be a violation of this policy for any student of the District to use, consume, display, promote, or sell any tobacco products, tobacco industry brand, tobacco-related devices, imitation tobacco products, or electronic smoking or vaping devices, regardless of content at any time on school property or at off-campus, school-sponsored events.

It shall be a violation of this policy for the District to solicit or accept any contributions, gifts, money, curricula, or materials from the tobacco industry or from any tobacco products retailer. This includes, but is not limited to, donations, monies for sponsorship, advertising, promotions, loans, or support for equipment, uniforms, and sports and/or training facilities. It shall be a violation of this policy to participate in any type of service funded by the tobacco industry while in the scope of employment for the District.

Exceptions

It shall not be a violation of this policy for tobacco products, tobacco-related devices, imitation tobacco products, or lighters to be included in instructional or work-related activities in school buildings if the activity is conducted by a staff member or an approved visitor and the activity does not include smoking, chewing, or otherwise ingesting the product.

The prohibition on the use of other products containing nicotine, including, but not limited to, nicotine patches and nicotine gum may be removed when a parent or "adult" student provides documentation from a licensed medical practitioner that the student's use of non-tobacco nicotine products is being medically supervised for the cessation of a nicotine addiction and the student complies with Policy 5330 - Administration of Medication.

Instruction in the history and purpose of traditional tobacco that has been used as a part of faith and tradition in the Native American and American Indian communities is an exception to this policy.

Policy Specific Definitions

The term "any time" means during normal school and non-school hours: twenty-four (24) hours a day, seven (7) days a week.

The term "electronic smoking device" means any product containing or delivering nicotine, or any other substance, whether natural or synthetic, intended for human consumption through the inhalation of aerosol or vapor from the product. The term electronic smoking device includes, but is not limited to, devices manufactured, marketed, or sold as e-cigarettes, e-cigars, e-pipes, vape pens, mods, tank systems, JUUL, or under any other product name or descriptor. The term electronic smoking device includes any

component part of a product, whether or not marketed or sold separately, including but not limited to e-liquids, e-juice, cartridges, and pods.

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The term "imitation tobacco product" means any edible non-tobacco product designed to resemble a tobacco product, or non-edible, non-tobacco product designed to resemble a tobacco product that is intended to be used by children as a toy. Examples of imitation tobacco products include but are not limited to: candy or chocolate cigarettes, bubble gum cigars, shredded bubble gum resembling chewing tobacco, pouches containing flavored substances packaged similar to snuff, shredded beef jerky in containers resembling snuff tins, plastic cigars, and puff cigarettes.

The term "off-campus, school-sponsored event" means any event sponsored by the school or School District that is not on school property, including but not limited to, sporting events, day camps, field trips, entertainment seminars, dances, or theatrical productions.

The term "school property" means all facilities and property, including land, whether owned, rented, or leased by the District, and all vehicles owned, leased, rented, contracted for, or controlled by the District used for transported students, staff and visitors.

The term "smoking" means inhaling, exhaling, burning, or carrying any lighted or heated cigar, cigarette or pipe, or any other lighted or heated product containing, made, or derived from nicotine, tobacco, marijuana, or other plant, whether natural or synthetic, that is intended for inhalation. "Smoking" also includes carrying or using an activated electronic smoking device.

The term "tobacco products retailer" means retailers whose primary business is to sell tobacco and/or tobacco-related products.

The term "tobacco industry" means manufacturers, distributors, or wholesalers of tobacco products, electronic smoking devices, or tobacco-related devices; this includes parent companies and subsidiaries.

The term "tobacco industry brand" means any corporate name, trademark, logo, symbol, motto, selling message, recognizable pattern of colors, or any other indication of product identification identical or similar to those used for any brand of tobacco product, company, or manufacturer of tobacco products.

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Legal	111.321, Wis Stats.
	120.12(20), Wis. Stats.
	20 U.S.C. 6081 et seq.
	20 U.S.C. 7182

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Book	Policy Manual
Section	First Reading by Board
Title	DISORDERLY CONDUCT
Code	po5520
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021

5520 - **DISORDERLY CONDUCT**

The ~~School~~ Board recognizes the right of each student to attend school for the purpose of receiving an education. Students involved in the disruption of the educational program of the schools by disorder or any other purposeful activity may be subject to disciplinary consequences, including, but not limited to, suspension and expulsion. will not be tolerated.

For purposes of this policy, disorder shall be any deliberate activity by an individual or a group, whether peaceful or violent, which is reasonably likely to disrupt the normal operation of the school.

The Board, having the responsibility for providing an educational program for the students of this District, shall have the authority to preserve order for the proper functioning of ~~its~~that program.

Students shall not be disturbed in the exercise of their constitutionally guaranteed rights to assemble peaceably and to express ideas and opinions, privately or publicly, provided that such exercise does not infringe on the rights of others and does not interfere with the operation of the schools.

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Book	Policy Manual
Section	First Reading by Board
Title	STUDENT ACTIVISM
Code	po5720
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021

5720 - STUDENT ACTIVISM

It is the policy of the ~~School~~ Board to ~~(X.)~~ encourage students to express opinions and ideas, take stands, and support policies, publicly or privately, orally and in writing. Students may be given this opportunity for expression through established school media. Such expression should not interfere with the educational program, ~~or~~ present a health or safety hazard, ~~or violate Board policy.~~ Students may advocate change of law or school regulations and pursue their advocacy ~~through lawful means~~ ~~by due process means.~~

Students may not use obscenity, slanderous or libelous statements, or disruptive tactics, or advocate violation of the law or school ~~policies or guidelines. regulations.~~ (See Policy 5520 - Disorderly Conduct).

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Cross References	5720F - Peaceful Protest po5720 - STUDENT ACTIVISM po5780 - STUDENT/PARENT RIGHTS po5840 - STUDENT GROUPS ag5723 - STUDENT RIGHTS OF EXPRESSION
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Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	PUBLIC PERFORMANCES BY STUDENTS
Code	po5880
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021

5880 - PUBLIC PERFORMANCES BY STUDENTS

The ~~School~~ Board recognizes the value to students of sharing their talents and skills with the community through participation and performances in public events. Students who participate in public events and performances as part of a District-sponsored group are subject to District policies and regulations for student dress and conduct.

The Board approves ~~endorses~~ such performances when:

- A. they constitute a learning experience which contributes to the educational program;
- B. the circumstances of the event do not pose a threat to the health, safety, and well-being of the students who will be involved.

All requests for public performances by students require the approval of the principal.

~~The Superintendent shall develop administrative guidelines to implement this policy which include the requirement that parental permission is sought and received before students participate and that the interests of our students are to be protected and guarded against exploitation.~~

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Book	Policy Manual
Section	First Reading by Board
Title	STUDENT FEES, FINES, AND CHARGES
Code	po6152
Status	First Reading
Adopted	May 25, 2016
Last Revised	September 30, 2021
Prior Revised Dates	11/20/2019

6152 - **STUDENT FEES, FINES, AND CHARGES**

The Board may levy certain charges to students to facilitate the utilization of adequate, appropriate learning materials used in the course of instruction. If the District determines that a student is in serious financial need, it may choose to provide any or all such materials free of charge. No student shall be denied any educational opportunity because of his/her inability to pay any fee or charge imposed. (See also Policy 6152.01 - Waiver of School Fees or Fines)

A charge shall not exceed the combined cost of the material used, freight and/or handling charges, and nominal add-on for loss. Money received from resale of such material shall be returned to the Business Office with an accurate accounting of all transactions.

Fines

When school property, equipment, or supplies are damaged, lost, or taken by a student, a fine will be assessed. The fine will be reasonable, seeking only to compensate the school for the expense or loss incurred.

[X] The late return of borrowed books or materials from the school libraries may be subject to appropriate fines.

Any fees (including trip fees) or fines collected by members of the staff are to be turned into the school office by the end of the day on which the money was collected. If the school office is not open or accessible, the collected monies should be deposited in the financial institution designated by the District or in another secure location specified by the District no later than the end of the day on which the money was collected. Staff are prohibited from leaving collected money in classrooms overnight or taking collected money home. Money shall be deposited by the District no less than one (1) week after collected with a full accounting of all transactions.

The Superintendent may waive fines or fees upon request, consistent with Policy 6152.01. In the event the above course of action (and additional business office efforts to collect the funds) does not result in the fee or fine being collected, the Board authorizes the Business Office to take the student and/or his/her parents to Small Claims Court for collection. The District shall not permit or elicit the assistance of volunteers in efforts to collect unpaid student fees or expenses, including food service balances.

Nothing in this policy restricts the right of access of a parent or student to school records or to receive copies of such records, as required by Federal and State laws.

Students Experiencing Homelessness - McKinney-Vento Act

No fine or fee shall be charged to a student identified as a student experiencing homelessness unless it is determined that the student has the ability to pay the fee or fine and that its imposition does not create a barrier to the student's ability to enroll, attend school, achieve academic success, or be identified as experiencing homelessness. Any dispute regarding a fine or a fee that is imposed, shall not delay the student's enrollment or serve as a barrier to enrollment by delaying the transfer of student records to another school or school district if applicable.

Immediate enrollment notwithstanding fines or fees shall be extended to extra-curricular and co-curricular activities as well as to academic programming.

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~~Revised 7/26/17~~

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Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	NEW - WAIVER OF SCHOOL FEES OR FINES
Code	po6152.01
Status	First Reading

~~NEW POLICY - VOL. 30, NO. 2~~

6152.01 - WAIVER OF SCHOOL FEES OR FINES

The Board shall waive fees or fines assessed only for students whose parent(s) are unable to afford them and such fees and fines are barriers to the educational program. The Superintendent may, as deemed necessary, establish additional procedures to supplement the procedures established in this policy regarding requests for the waiver of fees.

Eligibility Standards

Students eligible for a waiver of school fees or fines include, but are not limited to, the following:

- A. Students who qualify for free lunches or breakfasts under the School Free Lunch Program Act.
- B. Students who are experiencing homelessness pursuant to Policy 5111.01 - Homeless Students.
- C. Students who are eligible to receive reduced price lunch or breakfast.
- D. Students whose families have suffered very significant losses of income due to severe illness, ~~or~~ injury, or death in the family or unusual expenses including, but not limited to, fire, flood, or storm damage.
- E. Other good and just reasons, as determined by the Superintendent.

Notification to Parents

- A. Annually the substance of this policy shall be communicated in writing to the parent(s) of all students in the District.
- B. The first bill or notice sent to parent(s) who owe fees shall state:
 1. The District will waive fees or fines for persons unable to afford them in accordance with this policy.
 2. The procedure for applying for a waiver, and the name, address, and telephone number of the person to contact for information concerning a fee waiver.

Procedures for Resolution of Disputes

- A. An individual who cannot pay school fees or fines may submit a written request for ~~write a letter requesting~~ a waiver of fees to the Superintendent. This request ~~The letter~~ must contain the following:
 1. name(s) of student(s)

2. name of parent(s)
3. address of parent(s)
4. phone number of parent(s)
5. school where child(ren) attend(s)
6. reason for request for waiver of fees

The Superintendent shall have the authority to review the waiver request and request such further information, if any, as s/he deems necessary in order to make a decision on that request.

[DRAFTING NOTE: Students who are experiencing homelessness may also be considered an unaccompanied minor, whereby the Homeless Liaison shall be responsible for notification to such student(s) and assist in drafting the request for waiver of fees and fines.]

- B. No fee or fine shall be collected from any individual who is seeking a fee waiver in accordance with the District's policy until the District has acted on the initial request or appeal (if any is made), and the individual has been notified of the decision.
- C. If the Superintendent denies a request for a waiver, then within fifteen (15) school days of receipt of the request, a copy of the decision shall be mailed or provided in an appropriate method for those without a fixed residence or experiencing homelessness.

The decision shall state the reason for the denial and shall include the right to appeal, including the process and timelines for that action. The denial notice shall also include a statement indicating that reapplication may be made for a waiver any time during the school year if circumstances change.

- D. Students experiencing homelessness shall be immediately enrolled, scheduled for transportation, or otherwise registered for school programming regardless of outstanding fines or fees. The waiver review process shall be reviewed accordingly. If the imposition of a fine or fee is not a barrier to educational program access, the student may be assessed the fine or fee.

[DRAFTING NOTE: Select only one option]

- E. The decision of the Superintendent is final.

~~OR~~

~~[] An appeal of the Superintendent's decision must be made to the Board within seven (7) calendar days after receipt of the decision. An appeal shall be decided within thirty (30) calendar days of the receipt of the request for an appeal. () Parent(s) shall have the right to meet with the Board in order to explain why the waiver should be granted. [END OF OPTION]~~

Nondiscrimination

The Board expects all staff members to exercise the utmost care to see that, as a result of their actions or comments, students cannot differentiate between those students whose parents are unable to purchase required instructional materials, pay required fees and/or fines and those whose parents can.

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Legal National School Lunch Act, 60 Stat. 230 (1946), 42 U.S.C. 1751 (as amended)
 Child Nutrition Act of 1966, 80 Stat. 885, 42 U.S.C. 1771
 42 U.S.C. §11432(g)(1)

Last Modified by Ellen Suckow on November 12, 2021



Book	Policy Manual
Section	First Reading by Board
Title	USE OF TOBACCO AND NICOTINE ON SCHOOL PREMISES
Code	po7434
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	1/20/2021, 9/6/2019

7434 - **USE OF TOBACCO AND NICOTINE ON SCHOOL PREMISES**

The Board recognizes that the use of tobacco products, as well as other nicotine delivery systems, such as electronic smoking devices, are a health, safety, and environmental hazard for students, staff, visitors, and school facilities. The Board is acutely aware of the serious health risks associated with the use of these products, both to users and non-users, and that their use or promotion on school grounds and at off-campus school-sponsored events is detrimental to the health and safety of students, staff, and visitors. The Board also believes accepting tobacco industry gifts or materials will send an inconsistent message to students, staff, and visitors.

It shall be a violation of this policy for any visitor of the District to use, consume, or sell any commercial tobacco products, tobacco-related devices, imitation tobacco products, or electronic smoking or vaping devices, regardless of content at any time on school property or at off-campus, school-sponsored events.

It shall be a violation of this policy for the District to solicit or accept any contributions, gifts, money, curricula, or materials from the tobacco industry or from any tobacco products retailer. This includes, but is not limited to, donations, monies for sponsorship, advertising, promotions, loans, or support for equipment, uniforms, and sports and/or training facilities. It shall be a violation of this policy to participate in any type of service funded by the tobacco industry while in the scope of employment for the District.

Exceptions

It shall not be a violation of this policy for tobacco products, tobacco-related devices, imitation tobacco products, or lighters to be included in instructional or work-related activities in school buildings if the activity is conducted by a staff member or an approved visitor and the activity does not include smoking, chewing, or otherwise ingesting the product.

FDA approved cessation products or tobacco dependence products are exempt from this policy for adults and staff eighteen (18) years and older. Staff using such products and bringing them to any school property or school-sponsored activity are responsible for the safekeeping of these products at all times and are responsible for assuring that no students are able to obtain access to these products.

Instruction in the history and purpose of traditional tobacco that has been used as a part of faith and tradition in the Native American and American Indian communities is an exception to this policy.

Policy Specific Definitions

The term "any time" means during normal school and non-school hours: twenty-four (24) hours a day, seven (7) days a week.

The term "electronic smoking device" means any product containing or delivering nicotine, or any other substance, whether natural or synthetic, intended for human consumption through the inhalation of aerosol or vapor from the product. The term electronic smoking device includes, but is not limited to, devices manufactured, marketed, or sold as e-cigarettes, e-cigars, e-pipes, vape pens, mods, tank systems, JUUL, or under any other product name or descriptor. The term electronic smoking device includes any

component part of a product, whether or not marketed or sold separately, including but not limited to e-liquids, e-juice, cartridges, and pods.

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The term "imitation tobacco product" means any edible non-tobacco product designed to resemble a tobacco product, or non-edible, non-tobacco product designed to resemble a tobacco product that is intended to be used by children as a toy. Examples of imitation tobacco products include but are not limited to: candy or chocolate cigarettes, bubble gum cigars, shredded bubble gum resembling chewing tobacco, pouches containing flavored substances packaged similar to snuff, shredded beef jerky in containers resembling snuff tins, plastic cigars, and puff cigarettes.

The term "off-campus, school-sponsored event" means any event sponsored by the school or school district that is not on school property, including but not limited to, sporting events, day camps, field trips, entertainment seminars, dances, or theatrical productions.

The term "school property" means all facilities and property, including land, whether owned, rented, or leased by the District, and all vehicles owned, leased, rented, contracted for, or controlled by the District used for transported students, staff and visitors.

The term "smoking" means inhaling, exhaling, burning, or carrying any lighted or heated cigar, cigarette or pipe, or any other lighted or heated product containing, made, or derived from nicotine, tobacco, marijuana, or other plant, whether natural or synthetic, that is intended for inhalation. "Smoking" also includes carrying or using an activated electronic smoking device.

The term "tobacco products retailer" means retailers whose primary business is to sell tobacco and/or tobacco-related products.

The term "tobacco industry" means manufacturers, distributors, or wholesalers of tobacco products, electronic smoking devices, or tobacco-related devices; this includes parent companies and subsidiaries.

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Legal
20 U.S.C. 7182
120.12(20), Wis. Stats.
111.321, Wis. Stats.
20 U.S.C. 6081 et seq.

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Book	Policy Manual
Section	First Reading by Board
Title	VIDEO SURVEILLANCE AND ELECTRONIC MONITORING
Code	po7440.01
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	2/1/2021, 11/18/2020, 7/24/2019

7440.01 - VIDEO SURVEILLANCE AND ELECTRONIC MONITORING

The Board authorizes the use of video surveillance and electronic monitoring equipment at various facilities and school sites throughout the District and on school buses. Wherever the terms video surveillance or electronic monitoring are used, such reference includes both video and audio surveillance as possible technologies employed.

The Superintendent or designee is responsible for determining where to install and operate fixed-location video surveillance/electronic monitoring equipment in the District. The Superintendent shall assure that video surveillance is handled in accordance with the placement, monitoring, and access considerations incorporated into the school safety plan as more fully described in Policy 8420. The determination of where and when to use video surveillance/electronic monitoring equipment will be made in a nondiscriminatory manner. Video surveillance/electronic monitoring equipment may be placed in common areas in school buildings (e.g. school hallways, entryways, the front office where students, employees, and visitors are permitted to freely come and go, gymnasiums, cafeterias, libraries), the school parking lots and other outside areas, and in school buses. Except in extraordinary circumstances and with the written authorization of the Superintendent, video surveillance/electronic monitoring equipment shall not be used in areas where persons have a reasonable expectation of privacy (e.g. restrooms, locker rooms, changing areas, private offices (unless there is express consent given by the office occupant), or conference/meeting rooms).

Any person who takes action to block, move, or alter the location and/or viewing angle of a video camera shall be subject to disciplinary action.

Legible and visible signs shall be placed at the main entrance to buildings and in the areas where video surveillance/electronic monitoring equipment is in use to notify people that their actions/behavior are subject to being monitored/recorded, which may include video footage, audio recording, or both. Additionally, the Superintendent is directed to annually notify parents and students through the Student Handbook, and staff through the Staff Handbook, of the use of video surveillance/electronic monitoring systems in their schools, which may include either video or audio footage or both. In cases approved by the Superintendent, camera surveillance may be used for investigatory purposes without staff, student, or public notice, if the usage is calculated to further investigation into misconduct believed to have occurred or believed to be ongoing.

Any information obtained from video surveillance/electronic monitoring systems may only be used to support the orderly operation of the School District's schools and facilities, and for law enforcement purposes, and not for any other purposes. As such, recordings obtained through the use of video surveillance/electronic monitoring equipment may be used as evidence in any disciplinary proceeding, administrative proceeding, or criminal proceeding, subject to Board policy and regulations. Further, such recordings may become a part of a student's education record or staff member's personnel file.

The Board will not place video surveillance/electronic monitoring equipment for the purpose of obtaining information for routine staff appraisal/evaluation or monitoring; however, video footage captured in the normal course of surveillance which shows information pertinent to staff performance or conduct may be used for that purpose.

~~[] Additionally, prerecorded lessons or observations of online or virtual learning sessions may be included as part of an employee's evaluation.~~

Further, if an employee is assigned to work remotely (i.e., telework), the administration is authorized to conduct observations that consist of the supervisor reviewing video-recordings of the employee working and/or watching the employee perform his/her job responsibilities through means of a live-stream that includes both video and audio. ~~This~~ ³² includes instructional staff working part or full-time in a virtual school/learning/teaching environment.

Additionally, nothing herein shall prevent the administration from using information gathered through electronic means (i.e., viewing a video-recording or live-stream of an employee working) for employment purposes, including but not limited to completing components of an evaluation.

[END OF OPTION]

Recordings that capture students may be student records and as such will be treated as confidential subject to the Board's public records and student records policies.

Retention, Secure Storage, Access to and Disposal of Video Recordings

The Board shall maintain video surveillance/electronic monitoring recordings for a limited period. Any request to view a recording under this policy must be made within ~~seventy~~ ⁽⁷³⁰⁾ ~~thirty~~ days of the event/incident in order to assure its availability. Inquiries after that time period may be available depending on current retention capabilities. Unless a formal complaint is being investigated, recordings shall be destroyed after ~~seventy~~ ⁽⁷³⁰⁾ ~~thirty~~ days. If, however, action is taken by the Board/administration, as a result of a formal complaint or incident, recordings shall be kept consistent with the Board's record retention policy depending on the nature of the video record retained, but for a minimum of one (1) year from the date of the action taken.

All video surveillance/electronic monitoring recording media shall be considered legal evidence and treated as confidential or as directed by Board counsel. The release of original video recordings to individuals or outside agencies may only occur pursuant to subpoena or court order after the same has been reviewed by Board counsel.

Original video recordings shall never be edited or manipulated in any manner. When video recordings are requested by any law enforcement agency as part of an ongoing investigation, a duplicate may be provided for that purpose. The original media shall be protected from accidental overwrite or erasure during the duplicating process. Nothing in this paragraph prohibits the redaction of personally identifiable information from duplicated media when mandated by FERPA.

Video recordings may never be sold publicly, viewed, or distributed in any other fashion except as provided for by Board policy, ~~(X)~~ ^(X) AG 7440 - Facility Security, and consistent with State and Federal law.

Devices containing video recordings, scheduled to be destroyed must be securely disposed of in such a way that the personal information cannot be reconstructed or retrieved (e.g. shredding, burning, magnetically erasing the personal information).

This policy does not address or cover instances where school officials record a specific event (e.g. a play, music performance, athletic contest, graduation, or Board meeting), or an isolated instance where a classroom is video recorded for educational or research purposes. Authorized video recording for educational, instructional, and/or research purposes is permitted and is not addressed by this policy.

Video surveillance is to be implemented in accordance with this policy and the related guidelines, and consistent with the school safety plan. The Board will not accept or tolerate the improper use of video surveillance/electronic monitoring equipment and will take appropriate action in any cases of wrongful use of this policy.

~~Revised 7/24/19~~

~~Revised 11/18/20~~

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Legal 19.31 – 19.39, 118.125 Wis. Stats.
 FERPA 20 U.S.C. 1232g
 34 C.F.R. 99.1-99.67
 Title I of the Electronic Communication Privacy Act of 1986
 18 U.S.C. 2510-2521

Last Modified by Ellen Suckow on November 3, 2021



Book	Policy Manual
Section	First Reading by Board
Title	RELATIONS WITH NON-SCHOOL AFFILIATED GROUPS
Code	po9700
Status	First Reading
Adopted	May 25, 2016
Last Revised	November 3, 2021
Prior Revised Dates	5/19/2021, 11/15/2017

9700 - **RELATIONS WITH NON-SCHOOL AFFILIATED GROUPS**

It is the policy of the Board that students, staff members, and District facilities not be used for advertising or promoting the interests of any non-school related agency or organization, public or private, without the approval of the Superintendent or its delegated representative; and any such approval, granted for whatever cause or group, shall not be construed as an endorsement of said cause or group by this Board. All crowdfunding activities are subject to Policy 6605 - Crowdfunding (X) and AG 6605.

No non-school affiliated group may use the name, logo, mascot, or any other name which would associate an activity with the District without the specific written permission of the Superintendent. Additionally, no non-school affiliated group may use any assets of the District, including but not limited to facilities, technology, or communication networks without the specific written permission of the Superintendent.

School District Referendum Advocacy

This policy applies expressly to any outside organization's advocacy concerning School District referenda. Any such organization, whether advocating in favor of or in opposition to a referendum question must clearly identify themselves as independent of the School District and may not, under any circumstances, use School District logos, mascots, slogans or other such items that are protected by or regularly used and identified with the District. School District officials may not advocate for a position on a referendum in any manner in which such advocacy is in the individual's capacity as a School District official or may reasonably be perceived as such. School District officials may always provide factual information concerning any referendum question.

Other Activities by Non-School Affiliated Groups

A. Materials or Activities

All materials or activities proposed by outside organizations for student or staff use or participation shall be reviewed by the principal on the basis of the proposed activities or materials, educational contribution to part or all of the school program, benefit to students, and no such approval shall have the primary purpose of advancing the name, product, or special interest of the proposing group.

The Board shall not permit the use of any type of educational material, program, or equipment in its curricular, co-curricular, or extra-curricular activities or at any time during the school day if such materials, programs, or equipment contain partisan political or commercial messages or are designed to persuade students or staff members to acquire a particular product or service offered by a named individual, company, organization, association, or agency. Professional staff may, however, utilize political materials or those provided by special-interest groups in adopted courses of study with the approval of the principal.

B. Contests/Exhibits

The Board recognizes that contests, exhibits, and the like may benefit individual students or the District as a whole, but

participation in such special activities may not:

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1. have the primary effect of advancing a special product, group, or company;
2. make unreasonable demands upon the time and energies of staff or students or upon the resources of the District;
3. interrupt the regular school program;
4. involve any direct cost to the District.

The Superintendent shall establish administrative guidelines which ensure that the time, place, and manner of distribution of all nonschool-related materials are clearly established and communicated.

C. Solicitation of Funds

Because the District cannot accommodate every organization that desires to solicit funds for worthy purposes, the Board shall not permit any organization not related to the District to solicit funds on District property.

Permission to solicit funds will be granted only to those organizations or individuals who meet the permission criteria established in the District's administrative guidelines. Solicitation must take place at such times and places and in such a manner as specified in the administrative guidelines. In accordance with Board Policy 5830, no District student may participate in the solicitation without the Superintendent's approval.

Crowdfunding activities aimed at raising funds for a specific classroom or school activity, including extra-curricular activity, or to obtain supplemental resources (e.g., supplies or equipment) that are not required to provide a free, appropriate, public education to any students in the classroom may be permitted, but only with the specific approval of the Superintendent.

All crowdfunding activities are subject to Policy 6605 and AG 6605 - Crowdfunding.

D. Prizes/Scholarships/Other Awards

The Board is appreciative of the generosity of organizations that offer scholarships, prizes, or other awards to deserving students in this District.

In the administration of scholarships, prizes, or other awards, the District shall not unlawfully 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.

Administration of scholarship or award programs appropriately designated under this policy to benefit individuals in a particular group that has not traditionally been represented does not violate this policy.

It will be the District's practice to provide all outside agencies and organizations notification of the nondiscrimination policy in awarding prizes, scholarships, or other aids, benefits, or services.

The District may administer or assist in the administration of scholarships, fellowships, or other forms of financial assistance established by a domestic or foreign will, trust, bequest, or similar legal instrument that requires the award to go to a student of a particular sex, race, color, national origin, or with a particular disability. Such restricted awards must not lead to discrimination in access to the total amount of prizes, scholarships, or other awards available.

E. In accepting the offer of such scholarships or prizes from non-District entities or persons, the Board directs that these guidelines be observed:

1. The type of scholarship or prize, the criteria for selection of the winner, and any restrictions upon it shall be approved by the principal.
2. The principal, together with a committee of staff members designated by the principal, shall be involved in the selection of the recipient and, if agreeable to the sponsoring organization, the selection shall be left entirely to the principal and staff committee.

The District will periodically review its procedures for awarding scholarships, prizes, and other awards. This review will require that the District's procedure does not discriminate on the basis of sex, race, color, national origin, or disability in the overall effect of the scholarships, prizes, and other awards given to students.

F. Surveys and Questionnaires

Distribution of Surveys and Questionnaires to Students is governed by Policy 2416 - Student Privacy and Parental Access to Information. 335

~~Revised 11/15/17~~

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Legal 118.125, Wis. Stats.

Cross References [po2416 - STUDENT PRIVACY AND PARENTAL ACCESS TO INFORMATION](#)
[ag9700A - DISTRIBUTION OF MATERIALS TO STUDENTS](#)

Last Modified by Ellen Suckow on November 3, 2021