

**WAUNAKEE COMMUNITY SCHOOL DISTRICT  
BOARD OF EDUCATION POLICY COMMITTEE**

Tuesday, March 29, 2022

5:00 PM

Waunakee Community School District  
905 Bethel Circle  
Waunakee, WI 53597

Members of the public may attend Board of Education meetings in-person, and will be asked to check in with District personnel when you arrive.

Public comments will be limited to 3 minutes. The Board will allow 30 Minutes for public comments.

Public comments may be sent to Rebecca McDonough at [district\\_administrator@waunakee.k12.wi.us](mailto:district_administrator@waunakee.k12.wi.us) up to one hour before the start of the Board meeting. All comments will be reviewed by the Board members. Emailed comments will be reviewed by the board but not read out loud. Emailed comments sent during any part of the board meeting (Board Development, Closed session, Open session) will be forwarded to the board but may or may not be reviewed by the board until after the board adjourns. Comments must include the commentator's name, address, and must identify their connection to the District (if any) and any group they are representing in order to be considered by the Board.

If you would like to address the Board in-person during the public comments section of the meeting, you will be greeted in the lobby of the building, asked to check in with District personnel when you arrive so that you can be recognized and address the Board when your name is called.

A recording of the meeting will be posted on the District webpage within 24 hours of the meeting time.

A quorum of the Board may be present

**AGENDA**

**I. CALL TO ORDER**

**II. ROLL CALL**

**III. APPROVE AGENDA**

**IV. PUBLIC COMMENTS**

**V. ADVERTISING IN THE SCHOOLS -- POLICY 851**

**4**

Attached please find revised language to the policy related to Advertising in Schools.

Additionally, the administration has a meeting on April 4th with teaching staff to establish the advertising process, procedures, and parameters for the Marketing Class and the Digital Communication Class, related to the selling of advertising within their curriculum. Following this meeting, the proposal will run through the Curriculum Committee and then the Full Board.

**VI. SCHOOL PROPERTY DISPOSAL -- POLICY 690** **6**

Attached please find the current and the revised School Property Disposal Policies. The proposed policy follows the guidelines from the WASB model policy and incorporates feedback that you provided at the previous Policy Committee Meeting.

**VII. DISCUSS/CONSIDER GUIDELINES FOR ELECTED OFFICIALS IN SCHOOLS AND RELATED EVENTS** **11**

Attached please find the Draft Guidelines for Political Events In the Schools. At the last Policy Committee Meeting, the Committee asked for clarification on this item being a policy vs how it would be implemented if it were an administrative guideline. The administration will share how this document could be implemented as part of the required district inservice materials. The administration will also discuss with the Committee a few other items that have come forward regarding political activities that may or may not fit within this document.

**VIII. TRANSPORTATION IN AREAS OF UNUSUAL HAZARD** **12**

Attached please find a new policy that the administration is recommending for consideration related to Transportation in Areas of Unusual Hazard. This item was discussed at the previous Policy Committee Meeting and the administration is bringing it back based on feedback from the Committee.

**IX. FLAG POLICY**

**A. Review and Consider Feedback from the Board on the Flag Policy** **14**

Attached please find the Flag Policy that has been discussed at previous Committee Meetings and at the Full Board Meeting on March 14th. At the March Board Meeting, the full Board provided feedback to the Committee members on this policy. The Draft Policy is back at the Committee level for discussion and consideration.

**B. Mental Health Awareness -- May** **17**

Dave Boetcher requested that an agenda item be added to the Policy Committee Meeting related to Mental Health Awareness Month in May, and is seeking consideration for a flag that represents Mental Health Awareness to be flown at schools during the month of May. Dave will represent this item at the Committee Meeting.

Attached please find the Resolution and a picture of the flag. The cost of the flags, if considered, will be raised by the community IDEA group.

**X. UPDATE SPECIAL EDUCATION TRANSPORTATION AID ELIGIBILITY** **19**

Attached please find information regarding the regulations related to Transportation Aid for Special Education Students. This agenda item is in response to a question posed to a Board Member by a member of the public regarding transportation of disabled and non-disabled siblings. The administration will review the regulations related to this issue with the Committee. This item is for informational purposes.

**XI. FUTURE MEETINGS**

Topics for future meetings that have been discussed or requested:

- Politics/Speech in School
- WASB "Quick Look" Policies
- Next Series of Policies...

XII. **ADJOURN**

“Any person who has a qualifying disability as defined by the Americans with Disabilities Act who requires assistance with access or materials should contact the Waunakee Community School District Office at 849-2000, 905 Bethel Circle Drive Waunakee, WI 53597, at least twenty-four hours prior to the commencement of the meeting so that necessary arrangements can be made to accommodate the request.”

## ADVERTISING IN THE SCHOOLS

851

Neither the facilities, the name, the staff, nor the students of the schools, school system, nor any part thereof shall be employed in any manner for advertising or otherwise promoting the interests of any commercial or other non-school agency or organization except that:

- 1) The school may cooperate in furthering the work of any non-profit, community-wide social service agency, provided that such cooperation does not resist or impair the educational program of the schools.
- 2) The school may use films or other educational materials bearing only simple mention of the producing or sponsoring firm.
- 3) The schools may participate in radio or television programs under acceptable commercial sponsorship when such participation is supplementary or beneficial to the program of the schools.
- 4) The superintendent may, at his/her discretion, announce or authorize to be announced, any lecture or other community activity of particular educational merit.
- 5) The schools may, upon approval of the superintendent, cooperate with any governmental agency in promoting activities in the general public interest which are non-partisan and non-controversial and which promote the education or other best interests of the students.
- 6) School publications may accept and publish paid advertising under established procedures.
- 7) **School media productions may accept paid advertising under established procedures.**
- 8) **High school academic courses may involve students in the process of seeking paid advertising as a part of the course curriculum. These courses require prior approval of the School Board.**
- 9) Teachers may use source materials from commercial agencies, provided that this material has been approved by the principal. Approved source material may, from time to time, be called to the attention of the teachers by principals and the superintendent.
- 10) Other special situations as approved by the superintendent and/or Board of Education (e.g. scoreboards).

Legal Ref.: Section 118.12 Wisconsin Statutes

Cross Ref.: 363, Special Interest Materials <sup>4</sup>  
372, Student Publications  
850, Public Sales and Solicitations on School Property

851-Rule, Sales/Advertising – Exceptions

851 continued

Adopted: 2/14/83

Revised: March 1994  
December 1996  
July 2002

Waunakee Community School District

**SCHOOL PROPERTIES DISPOSAL**

The Board of Education shall dispose of surplus, obsolete equipment, materials, or supplies no longer required to accomplish the mission of the school system. Action to dispose shall be taken when equipment, materials, or supplies:

1. have been designated obsolete by the Business Manager.
2. have been found to be in violation of ordinance or statute.
3. exist in quantities exceeding the possibility of effective educational use by the District.
4. are educationally unsound, out of date, inaccurate, or in unusable condition.

The Business Manager, serving as District property custodian, shall make the determination as to the condition of these items.

Equipment, materials, and supplies determined to be surplus or obsolete by the Business Manager shall be classified and disposed of as follows:

1. Items having minimal or no resale value may be offered without cost to charitable or civic organizations, or disposed of by the most expedient and efficient method without Board approval.
2. Items having resale value.
  - a) Those estimated to have a fair market value of less than \$5,000 may be disposed of at the most advantageous price by public sale, and without Board approval. Sale of these items should be advertised to make them available to residents of the community. Online auction sites may be utilized to sell the surplus or obsolete items.
  - b) Items estimated to have a fair market value of \$5,000 or more shall be advertised for sale in a newspaper of general circulation in the District and sold to the highest bidder. The Board reserves the right to accept or reject all bids. Online auction sites may be utilized to sell the surplus or obsolete items.

All money received from the sale of surplus, obsolete equipment, materials, or supplies shall be deposited by the business manager in the general fund of the District.

The sale of property belonging to and not needed by the District shall be authorized by the District's Annual Meeting or special District meeting.

690 continued

Legal Ref.: Section 120.10(12) Wisconsin Statutes

Approved: 4/22/91

Revised: March 1994  
November 2005  
January 2014

Waunakee Community School District

### **Sale or Other Disposition of District Real Estate, Buildings, or Property Interests**

The School Board retains sole and exclusive authority to approve the sale or other disposition of any land, buildings, or other improvements to land that are owned by the District and no longer needed by the District. The Board shall also directly and expressly approve any sale, release, or modification of any District-owned or District-controlled interest in real property (e.g., an easement or covenant).

### **Sale or Other Disposition of Other District Property**

The Board also has authority to dispose of other District property not addressed in the previous section of this policy, including equipment, materials, or supplies found to be surplus, replaced, broken, damaged, in unusable condition, or obsolete.

The following positions are designated as authorized Director of Business Services under this policy:

1. The Director of Business Services shall oversee the allocation, review, and disposition of all equipment, materials, or supplies.

Whenever the Director of Business Services determines that District property is no longer going to be used in its current function or location, the Director of Business Services shall ensure that reasonable efforts are made to determine whether the property can be appropriately used in another District function or location. If so, the Director of Business Services shall arrange for the internal transfer/re-designation of the property.

For any property that the Director of Business Services determines is no longer going to be used in the District, the following general parameters for further disposition of the property shall apply:

1. Any items that the Director of Business Services, or his or her designee, has determined have minimal or no resale value may, without further Board approval, be (a) offered without cost to a charitable or civic organization or other governmental entity, or (b) discarded or otherwise disposed of using an efficient method.

Any per-item estimated resale value in excess of \$25 shall not be considered minimal, except that any property that does not require further Board approval prior to disposal and that remains unsold after having been offered for sale may be deemed to have minimal resale value.

2. Items (whether individually or grouped for a single transaction) that the Director of Business Services determines can be economically sold (or traded in) for value and that have an estimated resale/fair-market value below \$5,000 may be sold (or traded in) using a process approved by the Executive Director of Operations without further Board approval. Public processes intended to inform/solicit multiple potential buyers (e.g., the use of online public advertising or auctions) shall be the preferred means of attempting to sell such property, except where the Director of Business Services determines that another method of disposition is in the best interest of the District considering all relevant circumstances.
3. Items (whether individually or grouped for a single transaction) that the Director of Business Services estimates to have a resale or other fair-market value of \$5,000 or more may be disposed of only if the Board has expressly approved the specific disposition or expressly

authorized the administration to dispose of the specific piece(s) of property under approved parameters.

The disposition of District property under this policy shall be conducted in the public interest for the benefit of the District. Unless otherwise required by law or by some other special and enforceable condition, all money received from the sale or other disposition of District property shall be directed to the District's general fund.

**Legal References:**

**Wisconsin Statutes**

- [Section 77.54\(4\)](#) [sales tax treatment of certain sales of tangible personal property]
- [Section 118.12\(1\)\(b\)](#) [school board authority over sales of goods on school property]
- [Section 120.12\(21\)](#) [sales tax treatment of certain sales of tangible personal property]
- [Section 120.13\(19m\)](#) [school board authority to sell any property belonging to and not needed by the school district]
- [Section 120.13\(25\)](#) [school board lease of school district property at reasonable rental]
- [Section 175.10](#) [certain procurements for sales to employees prohibited by statute]
- [Chapter 287](#) [state solid waste reduction and recycling policy and requirements]
- [Chapter 291](#) [disposal of hazardous materials/substances; including electronic devices]

**Wisconsin Administrative Code**

- [NR 660 to NR 679](#) [regulations related to hazardous waste management]

**Federal Law**

- [2 C.F.R. §200.33](#) [definition of "equipment" tied to local capitalization threshold within the federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)]
- [2 C.F.R. §200.94](#) [definition of "supplies" tied to local capitalization threshold within the federal Uniform Guidance]
- [2 C.F.R. part 200 subpt. D](#) [general post-award requirements under the federal Uniform Guidance]
- [2 C.F.R. §200.311](#) [disposition of real property that is subject to the requirements of the federal Uniform Guidance]
- [2 C.F.R. §200.313](#) [disposition of equipment that is subject to the requirements of the federal Uniform Guidance]
- [2 C.F.R. §200.314](#) [disposition of supplies that are subject to the requirements of the federal Uniform Guidance]
- [2 C.F.R. §200.315](#) [disposition of intangible property that is subject to the requirements of the federal Uniform Guidance]
- [2 C.F.R. §200.322](#) [applicability of federal Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, under the federal Uniform Guidance]

**Cross References:**

*[Insert appropriate cross references to the policy as applicable to your district.]*

# DISPOSITION OF DISTRICT PROPERTY

Policy 690

Sample Policy 1

Page 3 of 3

**Adoption Date:**

## **DRAFT Guidelines for Elected Officials as Guest Speakers, Political Campaigns, Political Events, and Voter Registration**

The Waunakee Community School District values opportunities for our students to interact with local, state, and federally elected officials. These officials provide opportunities for our students to learn important civics lessons and insight into governmental processes, current events and issues on the forefront of current legislative bodies.

Visits to schools/classrooms with the intent to interact with students needs to align with the following guidelines:

- Clear articulated curricular purpose to the visit/speech topic.
- Appropriate topic and visitor for the age of students.
- Not for the purpose of campaigning or for partisan advocacy.
- Teachers should be willing to invite such speakers regardless of any incumbent's partisan affiliation.
- An opportunity to "opt out": Parents will be given an opportunity to opt their child out of such presentations.
- Approval by the building administrator.

Elected officials can attend school events for ceremonial purposes determined by the school district. Including but not limited to programs such as the opening of a new school, or to present an award or recognition.

The elected official and/or those accompanying the elected official shall not photograph school staff or students, or publish any photographs online, on social media or in any publication without appropriate consent from staff and/or students' families. This consent must be obtained by the visiting elected official prior to the visit. For students, a consent form would be provided by the elected official/governing body for families to return; the school's consent form does not cover this. Verbal consent is sufficient for staff, but this must be documented by the visiting politician and/or their team.

It is also permissible for student groups at the high school to work in conjunction with non-partisan entities, such as the League of Women Voters, to provide opportunities for age appropriate students to register to vote during non-instructional times at school. The plan for such activities would need to be presented to and approved by the high school principal.

Finally, the school district values the legislative process and varying opinions of its constituents, and therefore will not participate in events such as ceremonial signing of legislative bills etc. on school property.

# TRANSPORTATION IN UNUSUALLY HAZARDOUS AREAS

## Policy 751.6

### Sample Policy 1

Page 1 of 2

Under the ultimate direction of the District Administrator, the Executive Director of Operations shall have primary administrative responsibility for periodically reviewing and making recommendations for possible amendments to the District plan that (1) identifies areas of unusual hazard (if any) that students must face in walking to and from school; and (2) identifies procedures or other remedies that are intended as safeguards that will sufficiently remove or diminish the applicable hazard(s). District-provided transportation is a possible remedy for addressing an unusual hazard, but it is not the only possible remedy.

The District's plan shall address (1) unusual hazards in the areas surrounding any applicable public or private school, within which area the District does not provide student transportation to the students who are enrolled in that school; (2) any areas of unusual hazard that one or more students is required to traverse on the student's walking route to the student's District-designated bus stop.

In evaluating and identifying possible unusual hazards, the School Board and its designees will use the Department of Public Instruction's definition of "unusual hazard" and consider at least the following criteria:

- The ages of affected students, with the possibility that certain areas may be designated as unusually hazardous for certain age levels
- The availability of sidewalks, pedestrian paths, or similar walking space outside of the road/highway
- The availability and width of any pedestrian-use shoulder area of a road/highway
- Traffic counts/rates, to the extent reasonably available from the state, county, or applicable municipality (including at normal school arrival and dismissal times)
- Speed limits
- The presence or absence of designated pedestrian crosswalks
- The type of traffic control signs or devices (if any) at relevant areas of the road/highway
- The presence or absence of crossing guards
- If applicable, railroad crossings and the types of crossing controls that are in place
- If applicable, temporary hazards such as construction projects or street repairs

The above-listed criteria are not arranged in priority order, and no single factor is necessarily determinative of a designation. Rather, unusual hazards will be designated based on a holistic assessment of relevant facts and circumstances, which may include consideration of additional conditions/criteria not expressly listed in this policy. The District will make reasonable efforts to treat areas with materially the same circumstances in a consistent manner

# TRANSPORTATION IN UNUSUALLY HAZARDOUS AREAS

Policy 751.6

Sample Policy 1

Page 2 of 2

## Legal References:

### Wisconsin Statutes

[Section 121.54](#)

[state mandated transportation, generally; authority of annual meeting to elect to provide additional transportation]

[Section 121.54\(9\)\(a\)](#)

[mandate to have a district plan for areas of unusual hazard; procedures for filing and review of the plan by the county sheriff and DPI]

[Section 121.54\(9\)\(am\)](#)

[complaints by aggrieved persons alleging an area of unusual hazard exists that has not been identified by the district]

[Section 121.54\(9\)\(b\)](#)

[aggrieved persons may request the state superintendent to conduct a hearing on a district plan or plan amendment]

### Wisconsin Administrative Code

[Ch. PI 1](#)

[submission and processing of complaints and appeals to the state superintendent]

[Ch. PI 7](#)

[state regulatory definition of unusually hazardous areas]

## Cross References:

*[Insert appropriate cross references to the policy as applicable to your district.]*

## Adoption Date:

# Flag Policy

It is the policy of the Waunakee Community School District to display flags with dignity and respect at all school buildings and school owned sites.

1. Definitions. The following definitions shall apply to this Policy:

- “U.S. Flag” means the flag of the United States as defined in 4 USC 1.
- “Wisconsin Flag” means the State Flag of Wisconsin as defined in Wis. Stat. § 1.08.
- “Commemorative Flag” refers to any flag other than the U.S. Flag or the Wisconsin Flag. To constitute a Commemorative Flag, the flag must have previously been approved for display and must actually have been displayed by being flown at the United States Capitol or the State of Wisconsin Capitol within the previous ten (10) years before it can be eligible for display by the WCSD under this Policy. Commemorative Flags may not exceed 3’x5’ in size.
- “Flag Laws” means the applicable laws and policies of the United States, the State of Wisconsin, or the WCSD Board of Education as related to the display of the U.S. Flag and the Wisconsin Flag, including, but not limited to, U.S. Code Title 4, Chapter 1, and Wis. Stat. §§ 1.08, 1.14, and 5.35.

2. General Rule. Every school within the Waunakee Community School District shall fly the Flag of the United States of America and the Flag of the State of Wisconsin on an outside flagpole. All flags displayed at WCSD sites shall comply with all Flag Laws, including, but not limited to, laws and regulations addressing the order in which flags shall be displayed on a flagpole and laws and regulations addressing the lowering of flags to half-mast.

3. Dignity of the Flag of The United States of America:

- The flag of The United States of America will always take a position of prominence when displayed with other flags. The way that the National Flag shall be flown is governed by Federal and State guidelines.
- No flag shall be larger than the Flag of the United States of America.
- No flag shall fly higher than the Flag of the United States of America.
- Where there are multiple flags displayed together, the Flag of the United States of America shall always be displayed in a position of prominence:
  - If there are multiple flag poles, The Flag of the United States of America shall be displayed in the center of three flag poles, where the other secondary flags are displayed on separate flag poles.
  - When facing the front of a building, the Flag of the United States of America shall be to the left of an observer facing the flags when there are two flags, with the secondary flag displayed on the flagpole to the right.

4. Display At Half-Mast. Displaying flags at half-mast: Flags will be flown at half-mast as directed by the Governor of Wisconsin or at the direction of the President of the United States.

5. Commemorative Flags:

These procedures address the display of commemorative flags at WCSD schools.

All flags that are secondary to the Flag of the United States of America and the Wisconsin State Flag, and that are considered for display by the WCSD shall support and align with WCSD policies and shall support and be consistent with safe and inclusive learning and working environments for all students, staff, and community members. The District and the Board of Education shall have the sole discretion to determine whether a flag being considered for display meets this standard and its decision concerning display of the flag shall be final.

#### Consideration of Commemorative Flags:

- The WCSD may choose to display a Commemorative flag at WCSD sites when approved by the School Board and in accordance with this policy.
- Any member of the School Board may ask the School Board to authorize the display of a Commemorative Flag in accordance with this Policy.
- Commemorative Flags requests are to be submitted to the WCSD School Board no less than 2 full board meetings in advance of the date requested for display of the flag.
- A picture of the actual flag and description of the meaning and purpose for displaying the flag shall be submitted at time of request.
- The only WCSD Facilities at which a Commemorative Flag can be displayed is at a flagpole in front of the school buildings. Display of Commemorative Flags in other places is not permitted
- No more than one Commemorative Flag shall be displayed at a time at each authorized WCSD Site.
- Where a school has only one flagpole, the school may fly no more than one additional flag below the Flag of the United States of America and the State Flag of Wisconsin, on the same flagpole, for an approved period of time.
- Where a school has more than one flagpole, the Flag of the United States of America shall be displayed alone on its own flagpole. The school may fly up to two flags on each additional flagpole for an approved period of time.
- The dates for display of a Commemorative Flag shall be reasonably related to the event or cause to be commemorated.
- The WCSD shall be responsible for informing their school community about any additional flags that the District has approved for display. Such communications must include an explanation of the meaning and purpose for displaying the flag on the school website, including the time period that the flag will be displayed, on the school website.
- The WCSD retains the authority and discretion under this Policy to display a Commemorative Flag for a shorter period of time than requested and may also remove a Commemorative Flag to allow a different Commemorative Flag to be displayed, or for any other purpose deemed appropriate by the WCSD Board, including disruption caused by the flag impacting the school's educational environment, cultural or popular changes in the flag's originally reported meaning or message, or discovery of other meanings or messages that are not consistent with District policy, or state or federal law, any moratorium on or break in displaying Commemorative Flags declared by the Administration and subsequently approved by the Board, and/or any other non-discriminatory reason for removing a Commemorative Flag.
- The Board of Education may also order the flying of a flag in support of community awareness initiatives that align with the Board's values and supports the District's initiatives and are consistent with the mission of the Waunakee Community School District.



## Flag Resolution: Mental Health Awareness Flag

**Whereas**, President Joseph R Biden, Jr. proclaimed May as National Mental Health Awareness Month in 2021, stating a commitment to the assurance that “everyone knows that they are not alone, that help exists, and that we will provide mental health support needed to heal, recover, and thrive.”; and

**Whereas**, the National Alliance on Mental Illness (NAMI) utilizes the month of May to elevate the national movement to raise awareness, fight stigma, educate and provide support for people with mental illness and their families; and

**Whereas**, the lack of awareness and associated cultural stigma around having and treating a mental health illness creates an average delay between symptom onset and treatment of [11 years](#), according to NAMI,; and

**Whereas**, the lack of treatment can lead to various [effects](#) on the person (e.g. chronic diseases like diabetes or cancer, substance use disorder, cardiometabolic disease), their family (e.g. unpaid care of a loved one), their community (e.g. homelessness, incarceration, emergency visits, disability funding); and

**Whereas**, coping with the unique challenges presented to communities due to [COVID-19](#) pandemic (e.g. social isolation, adapting to new learning modalities, changes in routines and sleep habits) impacted young people’s mental health; and

**Whereas**, the Wisconsin Department of Public Instruction indicates that school-based mental health services can mitigate the impacts in children as well as improve academic outcomes by increasing social-emotional learning opportunities

**Whereas**, State Superintendent, Dr. Jill K. Underly, stated that “schools must be empowered to promote student and staff mental health” which is work “championed by...school counselors, psychologists, social workers, and nurses” and yet the Waunakee Community School District and other state and national public schools do not employ enough students services staff to meet recommended staff:student ratios (e.g. School Counselors 1:250; School Psychologists 1:500; School Social Workers 1:250; School Nurses 1:750); and

**Whereas**, flying the mental health flag, which incorporates an ombre green (the mental health awareness) “sunrise” shifting from dark to light, will increase awareness and prompt further education on important topics around mental health (e.g. demographics, support systems, etc.).

Now, Therefore, Be It Resolved, that the Waunakee Community School District recognizes the month of May as Mental Health Awareness Month and will fly the flag at its buildings during May, stating in 2022 and in each following year, to inspire awareness and discussion in our schools and community; and that this resolution be distributed to every school in the District.



# Specialized Transportation Aid Eligibility and Funding

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*June 12, 2020*

## Introduction

There are two state categorical aids available to Wisconsin LEAs for the cost of transporting students with individualized education plans (IEPs). A student with an IEP can be transported on a regular bus route with their peers and be counted for Pupil Transportation Aid. There is no legal requirement that a student must be transported on a separate route simply by virtue of having an IEP—in fact, separating such a student could violate their rights under state and federal laws to a free appropriate public education in the least restrictive environment.

For those students whose IEPs specify transportation needs, a district may provide specialized transportation and have a portion of those costs included in their overall costs eligible for Special Education and School-Age Parents Aid.

## Specialized Transportation Funding

DPI's policy on funding for the transportation of special education students is described in guidance from the Special Education Team, available at <https://dpi.wi.gov/sites/default/files/imce/sped/pdf/spec-ed-transportation-overview.pdf>. An LEA's excess costs of fulfilling the transportation needs of special education students, as prescribed by each student's IEP, are eligible for state Special Education Aid or IDEA grant funding. Those costs may include supplemental aides and services on a routine bus route. We encourage LEAs to include students with IEPs to be transported on a regular bus route with their peers; therefore support services for students with IEPs should be considered if that allows the student to be transported on the regular bus route. While the cost for transportation remains in Fund 10, these support services should be coded to Fund 27 and if the cost meets the requirements to be eligible for special education categorical aid the LEA is encouraged to claim that aid. This means it is possible for a student to be eligible for special education categorical aid for support services while being transported on the regular bus route and be eligible for Pupil Transportation Aid. A student who exclusively rides a specialized transportation route may not be counted for Pupil Transportation Aid.

A student's IEP may require they be transported on a specialized transportation route. A specialized transportation route is eligible for state Special Education Aid or IDEA grant funding if all the students on that route have IEPs requiring the transportation provided by that route. Eligible routes include:

1. Daily transportation to and from school.
2. Transportation for an off-site special education program, support service (e.g. occupational or physical therapy, adaptive physical education) or field trip.
3. Weekend transportation to and from a boarding home or state school.

The specific transportation costs eligible for state Special Education Aid are described in “Special Education and School-Age Parents Aid Eligibility,” available at [https://dpi.wi.gov/sites/default/files/imce/sfs/pdf/SPED\\_SAP\\_Aid\\_Elig.pdf](https://dpi.wi.gov/sites/default/files/imce/sfs/pdf/SPED_SAP_Aid_Elig.pdf). Eligible costs should be coded in Fund 27 to the appropriate 256000-series function and are included in the LEA’s total costs for which it receives a prorated amount of aid in the following year.

## Incidental Benefit

Under strict circumstances, a student without a disability, including a student experiencing homelessness, may utilize a specialized transportation route as an **incidental benefit** without disqualifying the costs of the route for state Special Education Aid or IDEA grant funding. This is only allowed in situations where the student without a disability is a member of the same household and is picked up in the same location as a student whose IEP requires specialized transportation. In addition, the route must not incur any additional costs for transporting the student without a disability, and they must not displace a student with a disability from the route. DPI will not be providing prior approvals for transporting students without disabilities—the LEA is responsible for maintaining any records to justify the eligibility of a route.

## Accommodation for Students Experiencing Homelessness or Foster Care

The McKinney-Vento Act requires LEAs to provide transportation for students experiencing homelessness to their schools of origin. Similar to the McKinney-Vento Act, the Every Student Succeeds Act (ESSA) seeks to improve the educational stability of students who have been placed in foster care by ensuring students remain in their school of origin (school in which the student was enrolled at the time of or immediately prior to foster care). Foster care (also known as out-of-home care in Wisconsin) includes a variety of arrangements including include foster homes, treatment foster homes, group homes, shelter care facilities, residential care centers, and the homes of relatives other than parents.

In order to provide flexibility in rapidly changing circumstances and promote compliance with both Acts, DPI will permit an LEA to utilize a specialized transportation route on a short-term basis (up to 20 school days) to transport a student newly experiencing homelessness or foster care, without affecting the route’s eligibility for state Special Education Aid or IDEA grant funding. That student must not displace a student with a disability from the specialized route, and their addition must not cause significant disruption to the students with disabilities served by the route. **Any additional, short-term cost incurred by transporting the student newly experiencing homelessness or foster care must be allocated to Fund 10.** A long-term (more than 20 school days) arrangement for a student experiencing homelessness or foster care to utilize a specialized transportation route must meet the incidental benefit requirements for that route to remain eligible for state Special Education Aid or IDEA grant funding.

## Specialized Transportation Examples

The following examples illustrate situations where specialized transportation funding may or may not be appropriate. However, it is ultimately the LEA’s responsibility to support its determination that a transportation cost is eligible for state Special Education Aid.

Example: A district owns a bus that has a wheelchair lift. This vehicle is used on a route that includes students without IEPs as well as one student with an IEP who uses a wheelchair.

- The presence of a wheelchair lift does not in and of itself make the route eligible for state Special Education Aid. The district should report the number of students transported on the route on its PI-1547 Pupil Transportation Report, including the student with the IEP. The entire cost of the route is coded to Fund 10.

Example: A district operates a route that transports several students with IEPs that require specialized transportation, as well as a few other students who live along the route.

- A route that can serve students with and without IEPs is not eligible for state Special Education Aid. The district should report the number of students transported on the route on its PI-1547 Pupil Transportation Report, including the students with IEPs. The entire cost of the route is coded to Fund 10.

Example: A student’s behavioral goals are such that their IEP requires specialized transportation accompanied by a sibling.

- An IEP may specify transportation with accompaniment by another student (e.g. as a peer mentor). Transporting the other student fulfills the IEP—it is not an incidental benefit subject to the requirements in the “Incidental Benefit” section of this document. The cost of transporting the other student would be supported by state Special Education Aid or IDEA grant funding, so they would not be reported on the PI-1547 Pupil Transportation Report.

Example: A district operates a home-to-school route that transports students with and without IEPs. The route drops them all off at the high school, except for one student who continues to a neighboring district as required by their IEP.

- The district may break the route into two parts. The home-to-school route would be coded to Fund 10 and all the students dropped off at the high school reported on the district’s PI-1547 Pupil Transportation Report. Only the portion of the route from the high school to the neighboring district would be eligible for state Special Education Aid and coded to Fund 27, project 011; that student would not be reported on the PI-1547.

Example: A district contracts with a parent to provide transportation for a student who has an IEP requiring specialized transportation.

- The cost of reimbursing the parent is eligible for state Special Education Aid.

Example: A special education student with transportation identified in the student’s IEP received specialized transportation at the beginning of the year, but during the year no longer needed that support and is switched to a regular bus route. Is the cost for transporting the student eligible for special education aid for specialized transportation and eligible for regular pupil transportation aid for the regular bus route even though both took place in the same year?

- Yes, in this example the student is eligible for special education aid for specialized transportation and eligible for regular pupil transportation aid because the student changed from specialized transportation to regular transportation based on IEP changes. However a student exclusively receiving special or additional transportation all year could not also be counted for regular transportation aid.

Example: A student's IEP allows them to ride the regular bus route with their peers; however their IEP identifies that they need a 1:1 aide while on the bus. Is the cost of the student's bus aide eligible for special education categorical aid and the student is eligible for pupil transportation aid?

- Yes, the cost of the bus aide is eligible for special education categorical aid and the student may be counted for pupil transportation aid. We encourage LEAs to include students with IEPs to be transported on a regular bus route with their peers. If the 1:1 bus aide assists in making this possible, is appropriately licensed, and is part of the student's IEP, the cost for the bus aide is a Fund 27 cost and eligible for the special education categorical aid. Note, the cost for transportation remains in Fund 10 and is not eligible for special education categorical aid.

Example: A rural district has a contracted route serving one student as required in their IEP. The route is 40 miles long, round-trip. When it gets back to town, the route passes the home of a student living one mile from school whose parent would like to pay for transportation.

- The district has two choices:
  - It may serve the parent-paid student by diverting another route, maintaining the state Special Education Aid eligibility of the original route.
  - It may pick up the parent-paid student and lose the state Special Education Aid eligibility of the route. The district should report the student with an IEP on its PI-1547 Pupil Transportation Report, and the entire cost of the route is coded to Fund 10. It should also be prepared to explain how the district had originally determined the student with a disability's needs were significant enough to warrant a separate route, but not so significant that the parent-paid student without a disability could be picked up.
- While this may seem strict, we encourage students with IEPs to be transported on a regular bus route with their peers. It is only when an IEP team feels the student would benefit from specialized transportation that the student is removed from a regular bus route. When a student has specialized transportation needs stated in their IEP, it is an intentional IEP-driven decision to separate the student from their peers; therefore the notion of picking up other students along the way with the specialized transportation route undermines that principle.

## Prior Approvals

In order to be eligible for state Special Education Aid, prior approval is required for:

- **Purchase or replacement of a vehicle utilized exclusively for specialized transportation.** The LEA should describe the vehicle to be purchased, its estimated or actual price, and the LEA's justification for purchase. It must also certify that the vehicle will be used exclusively for transporting students with IEPs requiring specialized transportation.
- **Purchase or replacement of accessibility equipment to fulfill particular students' IEPs costing \$10,000 or more.**
- **Provision of student lodging and meals in lieu of transportation.** The LEA must demonstrate that the needs of a student under their IEP will be met through providing room and board, and that it will be at a lower cost than physically transporting the student.

If the LEA plans to purchase a vehicle within a given fiscal year (between July 1 and June 30), this form must be submitted by June 15 of that fiscal year: <http://bit.ly/spedvehiclerequest>. If prior approval is not received, the vehicle will not be eligible for state special education categorical aid. Requests that are

submitted after June 15, will not be accepted. If the deadline is missed, the LEA has the option of adding the vehicle to their IDEA grant.

Requests that are approved will be followed with an approval letter from DPI's Special Education Team. The LEA will need to keep this letter as part of their procurement process and make it available upon the request from auditors.

## Vehicle Purchase Accounting

LEAs may elect to purchase a vehicle outright or under a lease-to-own agreement. The accounting of these purchase methods differs:

- With an outright purchase, the full price of the vehicle is recorded as an expenditure in the year the vehicle is purchased, coded to account 27E-256300-550-011. Depreciation costs are not recognized for state Special Education Aid eligibility.
- With a lease-to-own purchase, entries are required in each year of the contract term:
  - In the first year, the full value of the vehicle is recorded twice, first as an expenditure coded to account 27E-256300-550-011, and second as a revenue coded to account 27R-000000-878.
  - In each year of the contract term, including the first, the actual payments of principal and interest are recorded as expenditures coded to accounts 27E-281000-678-019 (principal) and 27E-281000-688-019 (interest).

## Vehicle Disposal or Change in Use

If the LEA disposes of a vehicle that was purchased in full or part with state Special Education Aid, or wishes to use it for non-special education purposes, it must decrease its aid-eligible transportation costs for the fiscal year in which the vehicle was disposed. The amount of that decrease is determined in one of the following ways:

- If the vehicle is sold, the sale price is used.
- If the vehicle is traded in for a new special education vehicle being purchased with prior approval, no decrease is required.
- If the vehicle is traded in for any other vehicle, the trade-in allowance stated in the purchase contract is used.
- If the vehicle is to be used for non-special education purposes, the fair market value is used.

That amount of transportation costs should be coded to project 019. If the amount exceeds the LEA's total transportation costs, contact the School Financial Services consultant.

## Further Information

If you have questions about specialized transportation and state Special Education Aid, contact the consultant on the DPI School Financial Services Team:

Roselynn Bittorf  
[roselynn.bittorf@dpi.wi.gov](mailto:roselynn.bittorf@dpi.wi.gov)  
608-267-9212

General questions about transporting special education students should go to your LEA's consultant on the DPI Special Education Team. A list of consultants is available at:

<https://dpi.wi.gov/sped/educators/local-performance-plans/contact>

More information on state special education aid is available on the DPI School Financial Services website:

<https://dpi.wi.gov/sfs/aid/special-ed/overview>

Updated June 12, 2020 updated links rlb

*Updated June 11, 2019 Removed language regarding a district may not receive both Pupil Transportation and Special Education categorical aids for the same student in the same year; clarified that support services for students with IEPs transported on the regular bus route is Fund 27 and potentially aidable; updated Accommodation section to include foster care. rlb*

*Updated February 7, 2019 to reflect new vehicle approval process/link to form rlb*

*Updated July 23, 2018 to reflect new contact information and correct broken links. rlb*

*Updated September 1, 2015 to provide more detail on "Incidental Benefit," add "Accommodation for Students Newly Experiencing Homelessness," and "Pupil Transportation Aid."*