Griffin School District #324

Griffin School Board Study Session

Date and Time

Wednesday December 3, 2025 at 6:00 PM PST

Location

Griffin School Library
6530 33rd Way NW
Olympia, WA 98502

Zoom Link

Agenda

		Purpose	Presenter
I.	**Opening Items**		
	A. Record Attendance		
	B. Call the Meeting to Order		
	C. Pledge of Allegiance & Land Acknowledgement		
	D. Approval of Agenda	Vote	
II.	**Board Member WSSDA Conference Debrief**		

		Purpose	Presenter
III.	**New Business**		
A.	Special Education Co-op	FYI	Katie Kent
B.	Committee/Liaison Assignments for Upcoming Year	Discuss	
IV.	**New Policy**		
A.	1821 Standards for Individual School Directors	Discuss	
B.	4001 Public Information Program	Discuss	
C.	4060 Distribution of Information	Discuss	
D.	5254 Staff Expression	Discuss	
V.	**Policy Updates**		
A.	1005 Key Functions of the Board	Discuss	
B.	1210 ANNUAL ORGANIZATIONAL MEETING	Discuss	
C.	1220 Board Officers and Duties of Board Members	Discuss	
D.	1630 Evaluation of the Superintendent	Discuss	
E.	4200 Parent Access and Safe and Orderly Learning Environment	Discuss	
F.	6030 Financial Reports	Discuss	
VI.	**Policy Review**		
A.	2106 Program Compliance	FYI	
B.	6040 Expenditures in Excess of Budget	FYI	
C.	6213 Reimbursement for Travel Expenses	FYI	
VII.	**Policy Removal**		
A.	4000 Public Information Program WSSDA shifted this policy to number 4001.	Discuss	

		Purpose	Presenter
B.	6023 Post Issuance Compliance	Discuss	

VIII. Superintendent Updates

A.	Superintendent Kirsten Rue	FYI	

IX. Closing Items

A.	For the Good of the Order		
B.	Adjourn Meeting	Vote	

"Where students thrive, feel valued, and shape a better world."

Coversheet

1821 Standards for Individual School Directors

Section:	IV. New Policy
Item:	A. 1821 Standards for Individual School Directors
Purpose:	Discuss
Submitted by:	
Related Material:	1821 Standards for Individual School Directors (WSSDA 2025).pdf

Policy: 1821
Section: 1000 - Board of Directors

Standards for Individual School Directors

Each individual board member will annually review the WSSDA *Individual School Director Standards* as a basis for assessing their own conduct as an elected school director. Collectively, the board will assess its performance in terms of its six major functions:

1. **Values and Ethical Behavior**
   Individual school directors model ethical behavior and are guided by values that:

   a. Place students' needs first.
   b. Demonstrate commitment to equity and high standards of achievement for each student.
   c. Commit to treating each individual with dignity and respect.
   d. Model high ethical standards.
   e. Advocate for public education.

2. **Leadership**
   Individual school directors serve as educational leaders in their communities and state by:

   a. Contributing to thoughtful governance discussions and decisions by being well informed, open-minded and deliberative.
   b. Understanding that authority rests with the board as a whole and not with individual directors.
   c. Articulating and modeling appropriate school director roles and responsibilities.
   d. Actively participating in school director duties and responsibilities.
   e. Demonstrating group membership and leadership skills, working within the board structure.
   f. Respecting the board's role in policy making and supporting all adopted board policies.

3. **Communication**
   Individual school directors engage in ethical, transparent and inclusive communications by:

   a. Building and maintaining positive connections with the community and staff.
   b. Communicating accurately and honestly, with awareness of the impact of their words and actions.
   c. Listening carefully and with an open mind.
   d. Maintaining civility and treating all people with respect and dignity.
   e. Maintaining confidentiality of appropriate matters.
   f. Referring people with needs or concerns to appropriate staff.
   g. Welcoming family, student, staff and community input.

4. **Professional Development**
   Individual school directors seek continuous growth in their own skills and knowledge by:

a. Committing the time and energy necessary to be informed and competent.
b. Keeping abreast of current issues, research, applicable laws, regulations, and policies that affect public education.
c. Participating in professional development, individually and with the board/superintendent team.

5. **Accountability**
Individual school directors are accountable in their governance role to their students,

families, staff, and community by:

a. Contributing to a functioning and effective board-superintendent team.
b. Taking personal responsibility for their own words and actions and the impact they have on others.
c. Respecting and abiding by board decisions.
d. Meeting expectations for transparency, including disclosing potential conflicts of interest and refraining from discussing or voting on those issues.
e. Complying with board policies and all laws.

6. **Commitment to Education Equity**
Individual school directors prioritize the success of each and every student in their district by:
    a. Engaging in ongoing learning about educational equity, diversity, inclusion and cultural competency as it relates to the role of the board.
    b. Seeking to understand their own culture and how it may differ from others'.
    c. Honoring the diverse experiences, strengths and barriers to success of students, staff and families.
    d. Collaboratively and proactively working to remove barriers for students, staff and families.
    e. Ensuring multiple perspectives are heard and honored by providing equitable opportunities for input.
    f. Fostering a culture of dignity and belonging by example and through policy.

Griffin Reviewed: **December 3, 2025**
WSSDA Adopted: **October 02, 2025**
Classification: **Important**

Legal References:

- WSSDA School Board Standards

Management Resources:

- 2025 - October Issue

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Coversheet

4001 Public Information Program

Section:	IV. New Policy
Item:	B. 4001 Public Information Program
Purpose:	Discuss
Submitted by:	
Related Material:	4001 Public Information Program (WSSDA 2023).pdf 4000 Public Information Program (Griffin).pdf

Policy: 4001
Section: 4000 - Community Relations

Public Information Program

The district will strive to maintain effective two-way communication channels with the public. Such channels will enable the board and staff to interpret the school's performance and need to the community and provide a means for citizens to express their needs and expectations to the board and staff.

The superintendent or designee will establish and maintain a communication process within the school system and between it and the community. Such a public information program will provide for a district annual report, news releases at appropriate times, news media coverage of district programs and events, and regular direct communication between individual schools and the community members they serve. The public information program will also assist staff in improving their skill and understanding in communicating with the public.

Community opinion may be solicited through parent organizations, parent-teacher conferences, open houses, and other such events or activities which may bring staff and citizens together. At times, board meetings may be scheduled at neighborhood schools. Survey instruments and/or questionnaires may be developed in order to gain a broad perspective of community opinion.

The board is a nonpartisan public body and will not endorse political candidates. Neither staff nor students will be asked to disseminate campaign materials from the schools nor will any of the district's facilities or communications services be used to disseminate such material.

The superintendent or designee will identify staff with significant public information responsibilities and establish guidelines for their work. The guidelines will address such matters as authority for making releases and the nature and content of bulletins to parents.

Staff Communications with the Public
Staff shares the responsibility for communicating and interpreting the district mission, its policies, programs, goals, and objectives to members of the community. Staff will perform their services and functions to the best of their ability and communicate with members of the community, parents, students, and other staff in a sincere, courteous and considerate manner. Staff will strive to develop and maintain cooperative school-community relations and to achieve the understanding and mutual respect that are essential to the success of the district.

Confidential information about students or other staff will be released only as permitted by law and district policies and procedures.

Public Health Information
The district will post a prominent link on its website's homepage and on each schools' homepage to information from the Department of Health that addresses substance use trends; overdose symptoms and response; and the secure storage of prescription drugs, over-the-counter medications, and firearms and ammunition.

Collection Of Disciplinary Data
The district will collect data on student disciplinary actions taken in each school, and the information will be available to the public on request. This information may not be personally identifiable, and will not include a student's name, address, social security number, or any identifiable information.

District Annual Report: School Improvement Plan

An annual district report in the form of a school improvement plan addressing the activities of the district and the administration's recommendations for improvement of student learning and district operations will be prepared by the superintendent or designee and presented to the board as soon as possible after the close of each school year and no later than October 1st of the following school year. Upon board approval, the report will be made available to the public and used as one means for informing parents and community members, the Office of the Superintendent of Public Instruction, and other districts in the area, of the programs and conditions of the district's schools. The district must ensure awareness of and compliance with certain statutory requirements as specified in Policy 2106 (Program Compliance). When the district is not in compliance, such deviations will be incorporated into the annual report.

Cross References:	4020 - Confidential Communications 2106 - Program Compliance 2121 - Substance Abuse Program 2004 - Performance Improvement Goals
Legal References:	RCW 28A.150.230 District school directors responsibilities RCW 28A.655.100 Performance goals - Reporting requirements HB 1230 (2023) School-Public Health Information

Griffin Updated::
Griffin Reviewed: **November 5, 2025, December 3, 2025**
WSSDA Last Revised: **July 24, 2023**
Classification: **Important**
Prior Revised Dates: **10.00; 10/01/2011**

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PUBLIC INFORMATION PROGRAM

The district shall strive to maintain effective two-way communication channels with the public. Such channels shall enable the board and staff to interpret the schools' performance and needs to the community and provide a means for citizens to express their needs and expectations to the board and staff.

The superintendent shall establish and maintain a communication process within the school system and between it and the community. Such a public information program shall provide for a district annual report, news releases at appropriate times, news media coverage of district programs and events, and regular direct communication between individual schools and the patrons they serve. The public information program shall also assist staff in improving their skill and understanding in communicating with the public.

Community opinion may be solicited through parent organizations, parent-teacher conferences, open houses and other such events or activities which may bring staff and citizens together. Survey instruments and/or questionnaires may be developed in order to gain a broad perspective of community opinion.

The board is a nonpartisan public body and as such shall not endorse political candidates. Neither staff nor students shall be asked to disseminate campaign materials from the schools nor shall any of the district's facilities or communications services be used to disseminate such material.

Collection of Disciplinary Data

The district will collect data on student disciplinary actions taken in each school, and the information will be available to the public on request. This information may not be personally identifiable, and shall not include a student's name, address or social security number.

Coversheet

4060 Distribution of Information

Section: IV. New Policy
Item: C. 4060 Distribution of Information
Purpose: Discuss
Submitted by:
Related Material: 4060 Distribution of Information (WSSDA 2023).pdf

Policy: 4060
Section: 4000 - Community Relations

Distribution of Information

The board recognizes that valuable social, recreational, and educational opportunities are available to families and students through nonprofit organizations and governmental entities providing services for students. The district may choose to make information available to students and families about these programs, provided that doing so does not interfere with the educational process.

Nonprofit organizations or governmental entities may submit information about activities for students for possible distribution through district channels, but any information distributed must meet certain standards and be approved according to the procedures accompanying this policy.

Griffin Adopted:
Griffin Reviewed: **December 3, 2025**
WSSDA Last Revised: **April 10, 2023**
Classification: **Discretionary**
Prior Revised Dates: **04.05; 12/01/2011**

Management Resources:

- 2023 - April Issue
- Policy News, April 2005 Distribution of Materials

Cross References:

- 3220 - Freedom of Expression
- 2340 - Religious-Related Activities and Practices

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Coversheet

5254 Staff Expression

Section: IV. New Policy
Item: D. 5254 Staff Expression
Purpose: Discuss
Submitted by:
Related Material: 5254 Staff Expression (WSSDA 2023).pdf

Policy: 5254
Section: 5000 - Personnel

Staff Expression

The Griffin School Board believes the district has an interest in maintaining an orderly and effective work environment while balancing employees' First Amendment rights to freedom of expression and diverse viewpoints and beliefs. When employees speak within their official capacity, their expression represents the district and may be regulated. The First Amendment protects a public employee's speech when the employee is speaking as an individual citizen on a matter of public concern. Even so, employee expression that has an adverse impact on district operations and/or negatively impacts an employee's ability to perform their job for the district may still result in disciplinary action up to and including termination.

Staff expression includes the performance of job responsibilities and how they represent the district in their use of district email accounts, school district buildings, district property, classrooms and how they present themselves to students.

Employees who use social media platforms are encouraged to remember that the school community may not be able to separate employees as private citizens from their role within the district. Employee expression on social media platforms that interferes with the district's operations or prevents the district from functioning efficiently and effectively may be subject to discipline up to and including termination.

The procedures that accompany this Policy will adhere to this policy and specify particular district standards for staff expression, including the conditions under which a staff member can participate in written or non-verbal expression. Any violation of this Policy or adopted Procedure may result in disciplinary action.

Cross References:	2340 - Religious-Related Activities and Practices 5252 - Staff Participation in Political Activities
Legal References:	RCW 41.06.250 Political activities RCW 42.17A.555 Use of public office or agency facilities in campaigns - Prohibition - Exceptions RCW 42.17A.635 Legislative activities of state agencies, other units of government, elective officials, employees

Griffin Review: **December 3, 2025**
WSSDA Adoption Date: **April 10, 2023**
Classification: **Discretionary**

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Coversheet

1005 Key Functions of the Board

Section: V. Policy Updates
Item: A. 1005 Key Functions of the Board
Purpose: Discuss
Submitted by:
Related Material: 1005 Key Functions of the Board (WSSDA 2025).pdf
1005 Key Functions of the Board (Griffin 2024)).pdf

Policy: 1005
Section: 1000 - Board of Directors

Key Functions of the Board

The research-based WA School Board standards outline the primary functions of the school board. These standards are linked to higher student achievement and more effective governance practices:

Responsible School District Governance:

Provide responsible school district governance by:

- Conducting board and district business in a fair, respectful, and responsible manner.
- Ensuring the board is accountable and open to the public, including seeking divergent and diverse perspectives in its decision-making process.
- Respecting and advocating mutual understanding of the roles and responsibilities of board members and the superintendent.
- Adopting policies based on well-researched practices that emphasize a belief that all students can achieve at high levels and that support continuous improvement of student achievement.
- Promoting healthy relationships by communicating supportively; inspiring, motivating, and empowering others; and exercising influence in a positive manner.
- Working as an effective and collaborative team.

Creating Conditions District-Wide for Student and Staff Success:

Create conditions district-wide for student and staff success by:

A. Providing for the safety and wellness of all students and staff;
B. Employing and supporting quality teachers, administrators and other staff and providing for their professional development;
C. Providing for learning essentials, including rigorous curriculum, technology and high-quality facilities;
D. Ensuring management of the organization, operations, and resources for an efficient and effective learning environment; and
E. Adopting and monitoring an annual budget that allocates resources based on the district's vision, goals and priorities for student learning.

Communication of and Commitment to High Expectations for Student Learning:

Set and communicate high expectations for student learning with clear goals and plans for meeting those expectations by:

- Articulating the conviction that each and every student can learn and the belief that student learning can improve regardless of existing circumstances or resources;
- Leading the development, articulation, and stewardship of a vision of learning that is shared and supported by schools and the community;
- Adopting a collaboratively developed district strategic plan focused on learning and achievement outcomes for each and every student; and
- Ensuring non-negotiable goals for student achievement are established and aligned with the district's strategic plan.

Holding the District Accountability for Student Learning:

Hold school district accountable for meeting student learning expectations by:

- Committing to continuous improvement in student achievement at each school and throughout the district;
- Evaluating the superintendent on clear and focused expectations; and
- Measuring student academic progress and needs based on valid and reliable assessments.

Engagement of the Community in Education:

Engage the local community and represent the values and expectations they hold for their schools by:

- Collaborating with families and community members, responding to diverse interests and needs, and mobilizing community resources;
- Ensuring school board and district transparency through a process that is open and accountable;
- Ensuring district information and decisions are communicated community-wide; and
- Soliciting input from staff and a wide spectrum of the community so that a diverse range of interests and perspectives on issues is considered.

Annually the board will reflect on the degree to which it has operated according to its key functions by conducting a board self-assessment and engaging in board development activities where needed.

For more information, visit the WSSDA School Board Standards.

Griffin Updated:
Griffin Reviewed: **December 3, 2025**
Griffin Adopted: **June 26, 2024**
WSSDA Last Revised: **October 02, 2025**
Classification: **Discretionary**
Prior Revised Dates: **04.97; 02/01/2012**

Management Resources:

- 2025 - October Issue
- Policy News, 2012 - February Issue
- 1997 - April Issue

Cross References:

- 1310 - Policy Adoption, Manuals and Administrative Procedures
- 1810 - Annual Governance Goals and Objectives
- 1820 - Board Self-Assessment

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Policy: 1005
Section: 1000 - Board of Directors

Key Functions of the Board

Acting on behalf of the people of each community, the school board will fulfill the following functions:

Responsible Governance:
The board, with participation by the community, will envision the future of the school district's educational program and formulate goals, define outcomes and set the course for the school district. This will be done within the context of racial, ethnic and religious diversity and with a commitment to education excellence and equity for all students.

Creating Conditions for Student and Staff Success:
To achieve the vision, the board will establish a structure which reflects local circumstances and creates an environment designed to ensure all students the opportunity to attain their maximum potential through a sound organizational framework. This includes employing a superintendent, developing and approving policies, formulating budgets, setting high instructional and learning goals for staff and students, and nurturing a climate conducive to continuous improvement.

High Expectations for Student Learning:
The board will continuously articulate the belief that all students can learn and that each student's learning can improve regardless of existing circumstances or resources. The board will act as leaders of a vision of shared learning that is supported by individual schools and the community.

Accountability for Student Learning:
The board's accountability for student learning will include adopting a system of continuous assessment of all conditions affecting education, including assessments for measuring staff and student progress towards goals. The public will be kept informed about programs and progress. Staff and board training will be provided to ensure continuous improvement of student achievement.

Community Engagement:
The board will serve as education's key advocate on behalf of students and their schools. The board will work to advance the community's vision for its schools, pursue the district's goals, encourage progress and energize systemic change and ensure that students are treated as whole persons in a diversified society.

Cross References:	0100 - Commitment to Planning
	0300 - Planning Process
	0700 - Plan Evaluation
	1310 - Policy Adoption, Manuals and Administrative Procedures
	1810 - Annual Governance Goals and Objectives
	1820 - Board Self-Assessment
Management Resources:	Policy News, 2012 - February Issue

Adoption Date: **June 26, 2024**

Classification: **Discretionary**
Revised Dates: **04.97; 02.12, 6/24**

Coversheet

1210 ANNUAL ORGANIZATIONAL MEETING

Section:	V. Policy Updates
Item:	B. 1210 ANNUAL ORGANIZATIONAL MEETING
Purpose:	Discuss
Submitted by:	
Related Material:	1210 Annual Organization Meeting (WSSDA 2025)).pdf 1210 Annual Organizational Meeting (GRIFFIN 2024).pdf

Policy: 1210
Section: 1000 - Board of Directors

Annual Organizational Meeting

Newly-elected board members are seated at the first regular meeting in December. A newly elected or appointed (less than one year) board member will not be eligible to serve as an officer unless the majority of the board is newly appointed or elected.

If a board member is unable to continue to serve as an officer, a replacement will be elected immediately. In the absence of both the chair and the vice chair, the board will elect a chair pro tempore who will perform the functions of the chair during the latter's absence.

The superintendent will act as board secretary and perform all the duties as outlined by law. In order to provide a record of the proceedings of each meeting of the board, the superintendent will appoint a recording secretary of the board.

In odd-numbered years at the same meeting, a WSSDA legislative representative will be elected to serve a two-year term.

The normal order of business will be modified for the annual organizational meeting by considering the following matters, after the approval of the minutes of the previous meeting:

A. Welcome and introduction of newly elected board members by the chair;
B. Call for nominations for chair to serve during the ensuing year;
C. Election of a chair (roll call vote);
D. Assumption of office by the new chair;
E. Call for nominations for vice chair to serve during the ensuing year;
F. Election of a vice chair (roll call vote);
G. (if applicable) Call for nominations for *WSSDA legislative representative* to serve for the next two years; and
H. Election of a *WSSDA legislative representative*.

Policies will continue from year to year and board to board until and unless the board changes them.

Griffin Updated:
Griffin Reviewed: **December 3, 2025**
WSSDA Last Revised: **October 02, 2025**
Griffin Adopted: **December 18, 2025**
Classification: **Discretionary**
Prior Revised Dates: **08.99; 08.05; 02.11; 12.11; 04/01/2017**

Legal References:

- RCW 28A.330.010 Board president, vice-president or president pro tempore - Secretary
- RCW 28A.330.020 Certain board elections, manner and vote required - Selection of personnel, manner
- RCW 28A.330.050 Duties of superintendent as secretary of the board
- RCW 28A.400.030 Superintendents duties
- RCW 29A.60.280 Local elected officials, commencement of term of office - Purpose

Management Resources:

- 2025 - October Issue
- 2017 - April Issue
- 2011 - February Issue

Cross References:

- 1225 - School Director Legislative Program

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Policy: 1210
Section: 1000 - Board of Directors

Annual Organizational Meeting

At the first regular meeting at which newly-elected board members are seated in election years and at the first regular meeting in December in non-election years, the board will elect from among its members a chair and a vice chair to serve one-year terms. A newly appointed board member will not be eligible to serve as an officer unless a majority of the board has been appointed.

If a board member is unable to continue to serve as an officer, a replacement will be elected immediately. In the absence of both the chair and the vice chair, the board will elect a president pro tempore who will perform the functions of the chair during the latter's absence.

The superintendent will act as board secretary and perform all the duties as outlined by law. In order to provide a record of the proceedings of each meeting of the board, the superintendent will appoint a recording secretary of the board.

The normal order of business will be modified for the annual organizational meeting by considering the following matters, after the approval of the minutes of the previous meeting:

A. Welcome and introduction of newly elected board members by the chair;
B. Call for nominations for chair to serve during the ensuing year;
C. Election of a chair (roll call vote);
D. Assumption of office by the new chair*;*
E. Call for nominations for vice chair to serve during the ensuing year;
F. Election of a vice chair (roll call vote);
G. The chair will ask for volunteers to serve on each of the following committees:
    - Budget
    - Facilities
    - Personnel
    - Legislative
    - Policy

    Each committee shall have no more than 2 members.

Policies will continue from year to year and board to board until and unless the board changes them.

Cross References:	1225 - School Director Legislative Program
Legal References:	RCW 28A.330.010 Board president, vice-president or president pro tempore — Secretary
	RCW 28A.330.020 Certain board elections, manner and vote required — Selection of personnel, manner
	RCW 28A.330.050 Duties of superintendent as secretary of the board
	RCW 28A.400.030 Superintendent's duties
	RCW 29A.60.280 Local elected officials, commencement of term of office — Purpose
Management Resources:	2017 - April Issue

Adoption Date: **December 18, 2024**

Classification: **Discretionary**
Revised Dates: **08.99; 08.05; 02.11; 12.11; 04.17; 7.24**

Coversheet

1220 Board Officers and Duties of Board Members

Section:	V. Policy Updates
Item:	C. 1220 Board Officers and Duties of Board Members
Purpose:	Discuss
Submitted by:	
Related Material:	1220 Board Officers and Duties of Board Members (WSSDA 2022).pdf 1220 Board Officers and Duties of Board Members (Griffin 2024).pdf

Policy: 1220
Section: 1000 - Board of Directors

Board Officers and Duties of Board Members

Chair
The chair presides at all meetings of the board and signs all papers and documents as required by law or as authorized by action of the board. The chair conducts the meetings in the manner prescribed by the board's policies. The chair has the full right to participate in all aspects of board action without relinquishing the chair, including the right to vote on all matters put to a vote.

It is the responsibility of the board chair to manage the board's deliberation so that it will be clear, concise, and directed to the issue at hand; to summarize discussion and/or action before moving on to the next agenda item; and to generally manage the meeting so that the agenda is treated in an expeditious manner.

The chair will be the official recipient of correspondence directed to the board and will provide, or cause to be provided to other board members and the superintendent, copies of the correspondence received on behalf of the board.

The chair is authorized to consult with the superintendent on issues such as board meeting, study session and board retreat planning prior to presentation to the full board and perform tasks to facilitate board meetings.

In dealing with the media and the public in general, the chair or his/her designee will serve as the spokesperson of the board. The chair is authorized to report and discuss those actions which have been taken and those decisions made by the board as a body. The chair will avoid speculating upon actions or decisions which the board may take but has not yet taken.

Officers of the Board: Vice Chair
The vice chair will preside at board meetings in the absence of the chair and will perform all of the duties of the chair in case of his/her absence or disability.

Legislative Representative *"Committee" has been removed*
The legislative representative serves as the board's liaison with the Washington State School Directors' Association (WSSDA) on legislative issues. The legislative representative will be elected from among the board members at the first regular meeting in December in odd numbered years and will serve for a period of two years. The legislative representative, board chair, or other board designee will represent the board at WSSDA's General Assembly, conveying local views and concerns to that body. When appropriate, the legislative representative obtains their board's support for a legislative proposal to be submitted to the Assembly and supporting it at the Assembly. The legislative representative will monitor proposed school legislation, and provide legislative updates periodically at board meetings.

Additionally, he/she will build relationships with local policy makers regarding WSSDA's legislative positions and priorities.

Duties of Individual Board Members
The authority of individual board members is limited to participating in actions taken by the board as a whole when legally in session. Board members will not assume responsibilities of administrators or other staff members. The board or staff will not be bound in any way by any action taken or statement made by any individual board member except when such statement or action is pursuant to specific instructions and official action taken by the board.

Each board member will review the agenda and any study materials distributed prior to the meeting and be prepared to participate in the discussion and decision-making for each agenda item.

Each member is obligated to attend board meetings regularly. Whenever possible, each director will give advance notice to the chair or superintendent of his/her inability to attend a board meeting. A majority of the board may excuse a director's absence from a meeting if requested to do so. The board may declare a board member's position vacant after four consecutive unexcused absences from regular board meetings.

Updated by Griffin:
Griffin Reviewed: **December 3, 2025**
Griffin Adopted: **July 24, 2024**
WSSDA Last Revised: **October 22, 2022**
Classification: **Discretionary**
Prior Revised Dates: **04.97; 12.07; 12.11; 04.17**

Legal References:

- RCW 28A.330.030 Duties of president
- RCW 28A.330.040 Duties of vice-president
- RCW 28A.330.080 Payment of claims - Signing of warrants
- RCW 28A.330.200 Organization of the board - Assumption of superintendents duties by board member, when
- RCW 28A.343.390 Quorum - Failure to attend meetings

Management Resources:

- 2022 - October Issue
- 2017 - April Issue
- Policy News, December 2007 Role of the School Board President

Cross References:

- 1225 - School Director Legislative Program
- 1450 - Absence of a Board Member

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Policy: 1220
Section: 1000 - Board of Directors

Board Officers and Duties of Board Members

Chair
The chair presides at all meetings of the board and signs all papers and documents as required by law or as authorized by action of the board. The chair conducts the meetings in the manner prescribed by the board's policies. The chair has the full right to participate in all aspects of board action without relinquishing the chair, including the right to vote on all matters put to a vote.

It is the responsibility of the board chair to manage the board's deliberation so that it will be clear, concise, and directed to the issue at hand; to summarize discussion and/or action before moving on to the next agenda item; and to generally manage the meeting so that the agenda is treated in an expeditious manner.

The chair will be the official recipient of correspondence directed to the board and will provide, or cause to be provided to other board members and the superintendent, copies of the correspondence received on behalf of the board.

The chair is authorized to consult with the superintendent on issues such as board meeting, study session and board retreat planning prior to presentation to the full board and perform tasks to facilitate board meetings.

In dealing with the media and the public in general, the chair or his/her designee will serve as the spokesperson of the board. The chair is authorized to report and discuss those actions which have been taken and those decisions made by the board as a body. The chair will avoid speculating upon actions or decisions which the board may take but has not yet taken.

Officers of the Board: Vice Chair/President
The vice chair will preside at board meetings in the absence of the chair and will perform all of the duties of the chair in case of his/her absence or disability.

Legislative Representative Committee
The legislative representative committee serves as the board's liaison with the Washington State School Directors' Association (WSSDA) on legislative issues. The legislative representative committee will be appointed from among the board members at the first regular meeting of the year in even numbered years and will serve for a period of two years. One member of the legislative representative committee, board chair, or other board designee will represent the board at WSSDA's General Assembly, conveying local views and concerns to that body. When appropriate, the legislative representative committee obtains their board's support for a legislative proposal to be submitted to the Assembly and supporting it at the Assembly. The legislative representative committee will monitor proposed school legislation, and provide legislative updates periodically at board meetings. Additionally, they will build relationships with local policy makers regarding WSSDA's legislative positions and priorities.

Duties of Individual Board Members
The authority of individual board members is limited to participating in actions taken by the board as a whole when legally in session. Board members will not assume responsibilities of administrators or other staff members. The board or staff will not be bound in any way by any action taken or statement made by any individual board member except when such statement or action is pursuant to specific instructions and official action taken by the board.

Each board member will review the agenda and any study materials distributed prior to the meeting and be prepared to participate in the discussion and decision-making for each agenda item.

Each member is obligated to attend board meetings regularly. Whenever possible, each director will give advance notice to the chair or superintendent of his/her inability to attend a board meeting. A majority of

the board may excuse a director's absence from a meeting if requested to do so. The board may declare a board member's position vacant after four consecutive unexcused absences from regular board meetings.

Cross References:	1225 - School Director Legislative Program 1450 - Absence of a Board Member
Legal References:	RCW 28A.330.030 Duties of president RCW 28A.330.040 Duties of vice-president RCW 28A.330.080 Payment of claims — Signing of warrants RCW 28A.330.200 Organization of the board — Assumption of superintendent's duties by board member, when RCW 28A.343.390 Quorum — Failure to attend meetings
Management Resources:	2017 - April Issue Policy News, December 2007 Role of the School Board President 2022 - October Issue

Adoption Date: **July 24, 2024**

Classification: **Discretionary**
Revised Dates: **04.97; 12.07; 12.11; 04.17; 10.22**

Coversheet

1630 Evaluation of the Superintendent

Section: V. Policy Updates
Item: D. 1630 Evaluation of the Superintendent
Purpose: Discuss
Submitted by:
Related Material: 1630 Evaluation of the Superintendent (WSSDA).pdf
1630 Evaluation of the Superintendent (Griffin).pdf

Policy: 1630
Section: 1000 - Board of Directors

Evaluation of the Superintendent

The board will establish evaluative criteria and will be responsible for evaluating the performance of the superintendent.

The superintendent will have the opportunity for confidential conferences with the board members, for the purpose of aiding the superintendent in their performance. The board, on the basis of the evaluation, may terminate, renew or extend the superintendent's contract for periods not to exceed three years.

Pursuant to state law, RCW 28a.150.230, names the school board as responsible "to adopt policies to: (a) Establish performance criteria and an evaluation process for its superintendent…" and through RCW 42.30.110(g) dictates the use of executive sessions for evaluating the performance of public employees.

In addition, state law, RCW 28A.405.100, requires that the evaluation process looks at these eight categories at a minimum:

- knowledge of, experience in, and training in recognizing good professional performance, capabilities and development;
- school administration and management;
- school finance;
- professional preparation and scholarship;
- effort toward improvement when needed;
- interest in pupils, employees, patrons and subjects taught in school;
- leadership;
- and ability and performance of evaluation of school personnel.

WSSDA provides a goal-centered model to support the effective evaluation of the superintendent.

Legal References:	RCW 28A.400.010 Employment of superintendent - Superintendents qualifications, general powers, term, contract renewal WSSDA Superintendent Evaluation
Management Resources:	2025 - October Issue 2013 - December Issue

Adopted by Griffin:
Reviewed by Griffin: **December 3, 2025**
WSSDA Last Revised: **October 02, 2025**
Classification: **Critical**
Prior Revised Dates: **04.98; 12.11; 12/01/2013**

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Policy: 1630
Section: 1000 - Board of Directors

Evaluation of the Superintendent

The board will establish evaluative criteria and will be responsible for evaluating the performance of the superintendent.

The superintendent will have the opportunity for confidential conferences with the board members, for the purpose of aiding the superintendent in his/her performance. The board, on the basis of the evaluation, may terminate, renew or extend the superintendent's contract for periods not to exceed three years.

Legal References:	RCW 28A.400.010 Employment of superintendent — Superintendent's qualifications, general powers, term, contract renewal

Adoption Date: **July 24, 2024**

Classification: **Essential**
Revised Dates: **04.98; 12.11; 12.13**

Coversheet

4200 Parent Access and Safe and Orderly Learning Environment

Section: V. Policy Updates
Item: E. 4200 Parent Access and Safe and Orderly Learning Environment
Purpose: Discuss
Submitted by:
Related Material:
4200 Parent Access and Safe and Orderly Learning Environment (WSSDA 2022))pdf.pdf
4200 Safe and Orderly Learning Environment (Griffin 2000).pdf

Policy: 4200
Section: 4000 - Community Relations

Parent Access and Safe and Orderly Learning Environment

Contacts with Staff
The learning environment and the staff's time for students will be free from interruption. Except in emergencies, staff will not be unreasonably interrupted in their work. Brief messages will be recorded so as to permit the staff member to return the call when free.

Certificated staff will be available for consultation with students and community members by appointment to assure an uninterrupted conference.

No one will solicit funds or conduct private business with staff on school time and premises.

Visitors
The board welcomes and encourages visits to school by parents/guardians, community members, and interested educators. Parents are assured access to their child's classroom as well as school sponsored activities for purposes of observing class procedure, teaching material, and class conduct. However, such observation must not disrupt the classroom or learning activity. The superintendent or designee will establish guidelines governing school visits to ensure orderly operation of the educational process and the safety of students and staff.

Disruption of School Operations

The superintendent or staff member in charge will direct a person to leave immediately if any person is:

A. Under the influence of controlled substances, including marijuana (cannabis) or alcohol; or
B. Is disrupting or obstructing any school program, activity, or meeting; or
C. Threatens to do so or is committing, threatening to imminently commit; or
D. Inciting another to imminently commit any act which would disturb or interfere with or obstruct any lawful task, function, process or procedure (of any student, official, classified or certificated staff member or invitee) of the school district.

If such a person refuses to leave, the superintendent or staff member will immediately call for the assistance of a law enforcement officer.

Griffin Updated:
Griffin Reviewed: **December 3, 2025**
WSSDA Last Revised: **March 02, 2022**
Griffin Adopted: **July 19, 2000**
Classification: **Critical**
Prior Revised Dates: **08.98; 12.02; 10.06; 12.11; 02.13; 02/01/2018**

Legal References:

- RCW 28A.605.020 - Parents' access to classroom or school sponsored activities - Limitation
- RCW 28A.635.020 - Wilfully disobeying school administrative personnel or refusing to leave public property, violations, when - Penalty
- RCW 28A.635.030 - Disturbing school, school activities, or meetings - Penalty
- RCW 28A.635.090 - Interference by force or violence - Penalty
- RCW 28A.635.100 - Intimidating any administrator, teacher, classified employee, or student by threat of force or violence unlawful - Penalty
- 20 U.S.C. 7908 - Armed Forces recruiter access to students and student recruiting information

Management Resources:

- 2022 - March Issue
- 2018 - February Policy Issue
- 2013 - February Issue

Cross References:

- 3510 - Associated Student Bodies
- 3124 - Removal-Release of Student During School Hours
- 4129 - Family Involvement

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Policy No. 4200
Community Relations

SAFE AND ORDERLY LEARNING ENVIRONMENT

Contacts With Staff

The learning environment and the staff's time for students shall be as free from interruption as possible. Brief telephone messages shall be recorded so as to permit the staff member to return the call when free.

Certificated staff shall be available for consultation with students and patrons one-half hour before and after school time. Students and patrons are urged to make appointments with staff to ensure an uninterrupted conference.

No one shall solicit funds or conduct private business with staff on school time and premises.

Visitors

The board welcomes and encourages visits to school by parents, other adult residents of the community and interested educators. The superintendent shall establish guidelines governing school visits to ensure orderly operation of the educational process and the safety of students and staff.

Disruption of School Operations

If any person is under the influence of drugs or alcohol or is disrupting or obstructing any school program, activity, or meeting, or threatens to do so or is committing, threatening to commit or inciting another to commit any act which would disturb or interfere with or obstruct any lawful task, function, process or procedure of any student, official, classified or certificated staff member or invitee of the school district, the superintendent or staff member in charge shall direct the person to leave immediately. If such a person refuses to leave, the superintendent or staff member shall immediately call for the assistance of a law enforcement officer.

Legal Reference:

RCW	28A.635.020	Willfully disobeying school administrative personnel or refusing to leave public property, violations, when--Penalty
	28A.635.030	Disturbing school, school activities, or meetings
	28A.635.090	Interfering by force or violence with any administrator, teacher or student unlawful

	28A.635.100	Intimidating any administrator, teacher or student
	28A.605.020	Parents' access to classroom or school sponsored activities
WAC	180-16-240	Supplemental program standards
	180-44-050	School day as related to the teacher

Adoption Date: July 19, 2000

Coversheet

6030 Financial Reports

Section: V. Policy Updates
Item: F. 6030 Financial Reports
Purpose: Discuss
Submitted by:
Related Material: 6030 Financial Reports (WSSDA 2013).pdf
6030 Financial Reports (Griffin 1999)).pdf

Policy: 6030
Section: 6000 - Management Support

Financial Reports

Monthly Report
The business office will prepare a monthly budget status report of the following funds:

A. General Fund (GF);
B. Capital Projects Fund (CPF);
C. Debt Service Fund (DSF);
D. Associated Student Body Fund (ASB Fund); and
E. Transportation Vehicle Fund (TVF).

A “statement of financial condition” will be submitted to the board each month. The superintendent will reconcile ending net cash and investments, revenues and expenditures reported by the county treasurer with the district records for all funds. As part of the budget status report, the superintendent will provide each director with a brief written explanation of any significant deviation in revenue and/or expenditure projections that may affect the financial status of the district.

Annual Financial and Statistical Report
At the close of each fiscal year, the superintendent, as board secretary, will submit to the board an annual financial statistical report. The report will include at least a summary of financial operations for the year.

Public Records Transparency Report
The board recognizes that responding to public record requests pursuant to Chapter 42.56, RCW is one of the district’s unique and core essential functions, and that full access to information concerning the conduct of government of every level must be assured as a fundamental and necessary precondition to the sound governance of a free society. Therefore, each month or quarter, the superintendent will submit to the board a Public Records Transparency Report that includes a list of all public records requests received by the district. At its discretion and in an effort to achieve the fullest transparency as to the public records requests it receives and to which it provides responses, the board or superintendent may post the report on its website.

Reviewed by Griffin: **December 3, 2025**
WSSDA Last Revised: **April 01, 2013**
Griffin Adopted: **November 17, 1999**
Classification: **Discretionary**

Prior Revised Dates: **02.98; 12.11**

Legal References:

- RCW28A.150.230Basic Education Act - District school directors responsibilities
- RCW28A.400.030(3)Superintendents duties
- WAC392-123-110Monthly financial statements and reports prepared by school district administrator
- WAC392-123-115Monthly budget status reports
- WAC392-123-120Statement of financial condition - Financial position of the school district
- WAC392-123-125Personnel budget status report
- WAC392-123-132Reconciliation of monthly county treasurersstatement to district records

Management Resources:

- 2013 - April Issue
- Public Records Transparency Report Form

Cross References:

- 6020 - System of Funds and Accounts

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Policy No. 6030
Management Support

FINANCIAL REPORTS

Monthly Report

The business office shall prepare a monthly budget status report of the following funds:

A. General fund,

B. Capital projects fund,

C. Debt service fund,

D. Associated student body fund, and

E. Transportation vehicle fund.

A "statement of financial condition" shall be submitted to the board each month. The superintendent shall reconcile ending net cash and investments, revenues and expenditures reported by the county treasurer with the district records for all funds. As part of the budget status report, the superintendent shall provide each director with a brief written explanation of any significant deviation in revenue and/or expenditure projections that may affect the financial status of the district.

Annual Financial and Statistical Report

At the close of each fiscal year, the superintendent, as board secretary, shall submit to the board an annual financial statistical report. The report shall include at least a summary of financial operations for the year.

Legal References:

RCW 28A.150.230 Basic Education Act of 1977--District school directors as accountable for proper operation of district--Scope--Responsibilities
28A.400.030(3) Superintendent's duties
WAC 392-123-110 Monthly financial statements and reports prepared by school district administrator
392-123-115 Monthly budget status report for general fund operations
392-123-120 Statement of financial condition--Financial position of the school district
392-123-125 Personnel budget status report
392-123-132 Reconciliation of monthly county treasurers' statement to district records

Adoption: November 17, 1999

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Coversheet

2106 Program Compliance

Section: VI. Policy Review
Item: A. 2106 Program Compliance
Purpose: FYI
Submitted by:
Related Material: 2106 Program Compliance.pdf

Policy: 2106
Section: 2000 - Instruction

Program Compliance

Annually, on or before October 1, the superintendent will determine if the district is in compliance with the following program requirements:

A. Appropriate measures are taken to safeguard all student and school district permanent records against loss or damage;
B. Provision is made for the supervision of instructional practices and procedures;
C. Current basic instructional materials are available for required courses of study;
D. A program of guidance, counseling and testing services is maintained for students in all grades offered by the school district;
E. A learning resources program is maintained;
F. The physical facilities of each building are adequate and appropriate for the educational program offered;
G. There is adequate provision for the health and safety of all students within the custody of the school district;
H. A current policy statement pertaining to the administration and operation of the school district is available online or in each building's administrative office including, but not limited to, policies governing the school building and classroom visitation rights of non-students;
I. The district is in compliance with the statutes which prohibit unequal treatment of individuals on the basis of race, sex, creed, color, honorably discharged veteran, sexual orientation, presence of any sensory, mental or physical disability or the use of a trained guide dog or service animal by a person with a disability and national origin in activities supported by common schools and which require equal access to Boy Scouts of America and other designated youth groups;
J. Within each school, the school principal has determined that appropriate student discipline is established and enforced. The school principal has conferred with the certificated employees in the school building in order to develop and/or review building disciplinary standards and the uniform enforcement of those standards;

Griffin Reviewed: **November 20, 2001, December 3, 2025**
Griffin Adopted: **May 17, 2000**
WSSDA Last Revised: **December 01, 2011**
Classification: **Important**
Prior Revised Dates: **10.98; 04.01; 08.04; 10.07**

Cross References:

- 6800 - Safety Operations and Maintenance of School Property
- 5240 - Evaluation of Staff
- 4040 - Public Access to District Records
- 4001 - Public Information Program
- 3410 - Student Health
- 3231 - Student Records
- 3210 - Nondiscrimination
- 2410 - High School Graduation Requirements
- 2140 - Guidance and Counseling
- 2104 - Federal and/or State Funded Special Instructional Programs
- 2090 - Program Evaluation
- 2020 - Course Design, Selection, and Adoption of Instructional Materials
- 1310 - Policy Adoption, Manuals and Administrative Procedures

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Coversheet

6040 Expenditures in Excess of Budget

Section: VI. Policy Review
Item: B. 6040 Expenditures in Excess of Budget
Purpose: FYI
Submitted by:
Related Material: 6040 Expenditures in Excess of Budget (WSSDA 2011).pdf

Policy: 6040
Section: 6000 - Management Support

Expenditures in Excess of Budget

Total budget expenditures for each fund as adopted in the budget will constitute the appropriations of the district for the ensuing fiscal year. The board will be limited in the incurring of expenditures to the grand total of such appropriations.

Board members, administrators or staff who knowingly or negligently violate or participate in a violation of this policy by incurring expenditures in excess of appropriations will be held civilly liable, jointly and severally, for such expenditures, including consequential damages, for each such violation. If as a result of any civil or criminal action the violation is found to have been done knowingly, such board member, administrator or staff member who is found to have participated in such breach will immediately forfeit his/her office or employment.

In the event of an emergency requiring expenditures in excess of the budget, the board may adopt a resolution which states the conditions constituting the emergency and the amount of the appropriation necessary to correct the situation. At any other time that the budget is to be increased by making an additional appropriation, the board, after proper notice, will adopt a resolution stating the facts and the amount of appropriation necessary to correct the situation. Any person may appear at the meeting at which the appropriation resolution is to be voted on and may be heard for or against the adoption. Passage of the resolution requires a majority vote of all members of the board.

Griffin Reviewed: **December 3, 2025**
WSSDA Last Revised: **December 01, 2011**
Griffin Adopted: **November 17, 1999**
Classification: **Discretionary**
Prior Revised Dates: **2.06**

Legal References:

- RCW28A.225.250Cooperative programs among school districts - Rules
- RCW28A.505.150Budgeted expenditures as appropriations - Interim expenditures - Transfer between budget classes - Liability for non-budgeted expenditures
- RCW28A.505.170First class school districts - Emergency or additional appropriation resolutions - Procedure
- WAC 392-123-071Budget extension - First class school districts
- WAC 392-123-072Budget extension - Second class school districts

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Coversheet

6213 Reimbursement for Travel Expenses

Section: VI. Policy Review
Item: C. 6213 Reimbursement for Travel Expenses
Purpose: FYI
Submitted by:
Related Material: 6213 Reimbursement for Travel Expenses (Griffin 2016).pdf

Policy: 6213
Section: 6000 - Management Support

Reimbursement for Travel Expenses

The actual and necessary expenses of a director, administrator, staff member or designate of the district incurred in the course of performing services for the district, whether within or outside of the district, may be reimbursed in accordance with the approval and reimbursement procedures of the district. For purposes of this policy, travel expense includes amounts paid for use of personal automobiles, other transportation, and actual expenses or reimbursement in lieu of actual expenses for meals, lodging and related items that are necessary while in the conduct of official business of the district. A staff member or district officer may be reimbursed for gratuities not exceeding customary percentages for the cost of meals as well as reasonable amounts for services such as baggage handling when the costs are incurred while the individual is engaged in district business or other approved travel.

Reimbursement for travel expenses will be made pursuant to the federal internal revenue code and Internal Revenue Service regulations.

Legal References:	RCW 28A.320.050 Reimbursement of expenses of directors, other school representatives, and superintendent candidates — Advancing anticipated expenses RCW 42.24.090 Municipal corporations and political subdivisions — Reimbursement claims by officers and employees Ch. 3, Sec. 4, Page 1 School Accounting Manual
Management Resources:	Policy News, April 2005 Credit Card Policy Updated Policy News, December 1999 IRS rules impact travel reimbursement

Adoption Date:
Classification: **Priority**
Revised Dates: **12.99; 04.05; 12.11**

4/27/16

Coversheet

4000 Public Information Program

Section: VII. Policy Removal
Item: A. 4000 Public Information Program
Purpose: Discuss
Submitted by:
Related Material: 4000 Public Information Program.pdf

PUBLIC INFORMATION PROGRAM

The district shall strive to maintain effective two-way communication channels with the public. Such channels shall enable the board and staff to interpret the schools' performance and needs to the community and provide a means for citizens to express their needs and expectations to the board and staff.

The superintendent shall establish and maintain a communication process within the school system and between it and the community. Such a public information program shall provide for a district annual report, news releases at appropriate times, news media coverage of district programs and events, and regular direct communication between individual schools and the patrons they serve. The public information program shall also assist staff in improving their skill and understanding in communicating with the public.

Community opinion may be solicited through parent organizations, parent-teacher conferences, open houses and other such events or activities which may bring staff and citizens together. Survey instruments and/or questionnaires may be developed in order to gain a broad perspective of community opinion.

The board is a nonpartisan public body and as such shall not endorse political candidates. Neither staff nor students shall be asked to disseminate campaign materials from the schools nor shall any of the district's facilities or communications services be used to disseminate such material.

Collection of Disciplinary Data

The district will collect data on student disciplinary actions taken in each school, and the information will be available to the public on request. This information may not be personally identifiable, and shall not include a student's name, address or social security number.

Coversheet

6023 Post Issuance Compliance

Section: VII. Policy Removal
Item: B. 6023 Post Issuance Compliance
Purpose: Discuss
Submitted by:
Related Material: 6023 Post Issuance Compliance (Griffin 2017).pdf

Policy 6023
Management Support: Governmental Bonds

GRIFFIN SCHOOL DISTRICT NO. 324, THURSTON COUNTY, WASHINGTON POST ISSUANCE COMPLIANCE POLICY

This policy is intended to guide Griffin School District No. 324, Thurston County, Washington in meeting its obligations under applicable statutes, regulations and documentation associated with publicly offered and privately placed securities of the District. This policy addresses obligations of the District that arise and will continue following the issuance of securities. These obligations may arise as a result of federal tax law (with respect to tax-exempt securities) and securities laws (with respect to ongoing disclosure) or as a result of contractual commitments made by the District. This policy outlines obligations that may be applicable to each issue of securities and identifies the party to be responsible for monitoring compliance. In the District, the Superintendent will be responsible for ensuring that the policy is followed and checklists and records maintained. The Superintendent may delegate responsibility to employees and outside agents for developing records, maintaining records and checklists. The District will provide educational opportunities (opportunities to attend educational programs/seminars on the topic) for the parties identified in this policy with responsibilities for post-issuance compliance in order to facilitate their performance of these obligations.

A. Transcripts.

1. The District's bond counsel shall provide the District with two copies of a full transcript related to the issuance of securities (for each issue). The transcript shall be delivered in the following forms: two USB drives and transcripts shall be delivered to the District within six months following the date of issuance of securities. It is expected that the transcript will include a full record of the proceedings related to the issuance of securities, including proof of filing an 8038-G or 8038-GC, if applicable.

2. Bond transcripts will be retained by the following parties and in the following locations within the District: In the office of the Finance and Human Resources Administrator at 6530 33rd Avenue NW, Olympia, WA 98502.

B. Federal Tax Law Requirements (Applicable only if the securities are issued as "tax-exempt" securities).

1. *Use of Proceeds.*

a. If the project(s) to be financed with the proceeds of the securities will be funded with multiple sources of funds, the District will adopt an accounting methodology that:

(i) Maintains each source of funding separately and monitors the actual expenditure of proceeds of the securities;

(ii) Commingles the proceeds and monitors the expenditures on a first in, first out basis; or

(iii) Provides for the expenditure of funds received from multiple sources on a proportionate basis.

b. Records of expenditures (timing of expenditure and object code) of the proceeds of securities will be maintained by the Superintendent.

c. Records of investments and interest earnings on the proceeds of securities will be maintained by the Superintendent. Such records should include the amount of each investment, the date each investment is made, the date each investment matures and if sold prior to maturity, its sale date, and its interest rate and/or yield. Interest earnings on proceeds will be deposited in the fund in which the proceeds of the securities were deposited (if not, then the plan for use of interest earnings will be discussed with the District's bond counsel).

d. Records of interest earnings on reserve funds maintained for the securities.

2. *Arbitrage Rebate*. The Superintendent of the District ("Rebate Monitor") will monitor compliance with the arbitrage rebate obligations of the District for each issue ("issue") of securities which are described in further detail in the tax certificate if any, executed by the District for each issue and included in the transcript for the issue. If the District did not execute a tax certificate in connection with an issue, the Rebate Monitor should consult with the District's bond counsel regarding arbitrage rebate requirements. The District will provide educational opportunities (opportunities to attend educational programs/seminars on the topic) for the Superintendent in order to facilitate his/her performance of these obligations.

a. If the Rebate Monitor determines that the total principal amount of tax-exempt governmental obligations (including all tax-exempt leases, etc.) of the District issued by or on behalf of the District and subordinate entities during the calendar year, including the issue, will not be greater than $5,000,000, plus such additional amount not in excess of $10,000,000 as is to be spent for the construction of public school facilities, the Rebate Monitor will not be required to monitor arbitrage rebate compliance for the issue, except to monitor expenditures and the use of proceeds after completion of the project (see #3 below). For purposes of this paragraph, tax-exempt governmental obligations issued to currently refund a prior tax-exempt governmental obligation will only be taken into account to the extent they exceed the outstanding amount of the refunded bonds.

b. If the Rebate Monitor determines that the total principal amount of tax-exempt governmental obligations (including all tax-exempt leases, etc.) of the District issued or incurred any calendar year is greater than $5,000,000, plus such additional amount not in excess of $10,000,000 as is to be spent for the construction of public school facilities, the Rebate Monitor will monitor rebate compliance for each issue of tax-exempt governmental obligations issued during that calendar year.

(i) *Rebate Exceptions.* The Rebate Monitor will review the tax certificate, if any, in the transcript in order to determine whether the District is expected to comply with a spending exception that would permit the District to avoid having to pay arbitrage rebate. If the tax certificate identifies this spending exception (referred to as the six-month exception, the 18 month exception or the 2-year exception), then the Rebate Monitor will monitor the records of expenditures (see B.1 above) to determine whether the District met the spending exception (and thereby avoid having to pay any arbitrage rebate to the federal government). If the District did not execute a tax certificate in

connection with an issue, the Rebate Monitor should consult with bond counsel regarding the potential applicability of spending exceptions.

(ii) *Rebate Compliance.* If the District does not meet or does not expect to meet any of the spending exceptions described in (i) above, the District will:

x. Review the investment earnings records retained as described in B.1 above. If the investment earnings records clearly and definitively demonstrate that the rate of return on investments of all proceeds of the issue were lower than the yield on the issue (see the tax certificate in the transcript), then the District may opt not to follow the steps described in the following paragraph.

y. Retain the services of an arbitrage rebate consultant in order to calculate any potential arbitrage rebate liability. The rebate consultant shall be selected no later than the completion of the project to be financed with the proceeds of the issue. A rebate consultant may be selected on an issue by issue basis or for all securities issues of the District. The Rebate Monitor will obtain the names of at least three qualified consultants and request that the consultants submit proposals for consideration prior to being selected as the District's rebate consultant. The selected rebate consultant shall provide a written report to the District with respect to the issue and with respect to any arbitrage rebate owed if any.

z. Based on the report of the rebate consultant, file reports with and make any required payments to the Internal Revenue Service, no later than the fifth anniversary of the date of each issue (plus 60 days), and every five years thereafter, with the final installment due no later than 60 days following the retirement of the last obligation of the issue.

c. *Yield Reduction Payments.* If the District fails to expend all amounts required to be spent as of the close of any temporary period specified in the Tax Certificate (generally 3 years for proceeds of a new money issue and 13 months for amounts held in a debt service fund), the District will follow the procedures described in B.2.b.ii above to determine and pay any required yield reduction payment.

3. *Unused Proceeds Following Completion of the Project.* Following completion of the project(s) financed with the issue proceeds, the Superintendent will:

a. review the expenditure records to determine whether the proceeds have been allocated to the project(s) intended (and if any questions arise, consult with bond counsel in order to determine the method of re-allocation of proceeds); and

b. direct the use of remaining unspent proceeds (in accordance with the limitations set forth in the authorizing proceedings (i.e., bond ordinance) and if no provision is otherwise made for the use of unspent proceeds, to the redemption or defeasance of outstanding securities of the issue.

4. *Use of the Facilities Financed with Proceeds.* In order to maintain tax-exemption of securities issued on a tax-exempt basis, the financed facilities (projects) are required to be used for governmental purposes during the life of the issue. The Superintendent of the District will monitor and maintain records regarding any private use of the projects financed with tax-

exempt proceeds. The IRS Treasury Regulations prohibit private business use (use by private parties (including nonprofit organizations and the federal government)) of tax-exempt financed facilities beyond permitted *de minimus* amounts unless cured by a prescribed remedial action. Private use may arise as a result of:

a. Sale of the facilities;

b. Lease of the facilities (including leases, easements or use arrangements for areas outside the four walls, e.g., hosting of cell phone towers);

c. Management contracts (in which the District authorizes a third party to operate a facility (e.g., cafeteria);

d. Preference arrangements (in which the District grants a third party preference of the facilities, e.g., preference parking in a public parking lot).

If the Superintendent identifies private use of tax-exempt debt financed facilities, the Superintendent will consult with the District's bond counsel to determine whether private use will adversely affect the tax-exempt status of the issue and if so, what remedial action is appropriate.

5. *Records Retention.*

a. Records with respect to matters described in this Subsection B will be retained by the District for the life of the securities issue (and any issue that refunds the securities issue) and for a period of three years thereafter.

b. Records to be retained:

(i) The transcript;
(ii) Arbitrage rebate reports prepared by outside consultants;
(iii) Work papers that were provided to the rebate consultants;
(iv) Records of expenditures and investment receipts (showing timing of expenditure and the object code of the expenditure and in the case of investment, timing of receipt of interest earnings). (Maintenance of underlying invoices should not be required provided the records include the date of the expenditure, payee name, payment amount and object code; however, if those documents are maintained as a matter of policy in electronic form, then the District should continue to maintain those records in accordance with this policy);
(v) Copies of all certificates and returns filed with the IRS (e.g., for payment of arbitrage rebate); and
(vi) Copies of all leases, user agreements for use of the financed property (agreements that provide for use of the property for periods longer than 30 days), whether or not the use was within the four walls (e.g., use of the roof of the facility for a cell phone tower).

C. Ongoing Disclosure. Under the provisions of SEC Rule 15c2-12 (the "Rule"), underwriters are required to obtain an agreement for ongoing disclosure in connection with the public offering of securities. Unless the District is exempt from compliance with the Rule as a result of certain permitted exemptions, the transcript for each issue will include an undertaking by the District to

comply with the Rule. The Superintendent of the District will monitor compliance by the District with its undertakings. These undertakings may include the requirement for an annual filing of operating and financial information and will include a requirement to file notices of listed "material events." For some types of material events (early bond calls), the State's fiscal agent has undertaken the responsibility of filing notice of the applicable material event.

D. Other Notice Requirements. In some instances, the proceedings authorizing the issuance of securities will require the District to file information periodically with other parties, e.g., bond insurers, banks, rating agencies. The types of information required to be filed may include (1) budgets, (2) annual financial reports, (3) issuance of additional debt obligations, and (4) amendments to financing documents. The Superintendent of the District will maintain a listing of those requirements and monitor compliance by the District.

Adopted Date: 2/22/17
Classification: Discretionary

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