

Rooted School - New Orleans

Board Action Session [2025 BUDGET APPROVAL] & Board Work Session [Annual Board Retreat]

2025 - 2026 PUBLIC BUDGET REVIEW & APPROVAL & BOARD RETREAT

Published on June 17, 2025 at 10:24 AM CDT

Amended on June 18, 2025 at 7:22 AM CDT

Date and Time

Friday June 20, 2025 at 9:00 AM CDT

Location

IN PERSON:

Who: Rooted School

Where: SUNO School of Education & Human Development

Room 106

Social Hall

When: Friday June 20, 2025

MEETING NOTIFICATION

Friday June 20, 2025

9:00 AM Central Time

IN PERSON MEETING:

Rooted School

6701 Press Drive

SUNO School of Education & Human Development

ROOM : 106 - SOCIAL HALL

VIRTUAL OPTION:

If you wish to join the meeting virtually:

When: Friday June 20, 2025 9:00 AM Central Time

*You must register in advance for this meeting.

<https://us02web.zoom.us/meeting/register/5lyHeLiSSmOlP3aOa11rQ>

IMPORTANT PUBLIC NOTICE:

Pursuant to emergency proclamation 30-JCE 2020, the Rooted School New Orleans Board hereby certifies that it will conduct all meetings scheduled for 2024 - 2025, in person (unless otherwise designated), at 6701 Press Dr. in the College of Education Building & Human Development on SUNO's campus in the Social Hall (Room 106) on the 1st Floor.

Board meetings shall be held in this manner until further notice.

Agenda

	Purpose	Presenter	Time
I. Opening Items			9:00 AM
A. Record Attendance	Vote	Frank Ingargiola	2 m
Attendance was recorded by Frank Ingargiola.			
B. Call the Meeting to Order		Mark Quinn	1 m
The meeting was called to order by Mark Quinn.			
C. Approve Minutes	Approve Minutes	Mark Quinn	2 m
The Board voted to approve the minutes of the 04-23-2025 Rooted School Board of Directors meeting.			
Approve minutes for MEETING OF THE ROOTED SCHOOL BOARD OF DIRECTORS on April 23, 2025			

	Purpose	Presenter	Time
II. PUBLIC MEETING PORTION: 2024 - 2025 Budget Amendment & 2025 - 2026 FY Budget Forecast/Approval			9:05 AM
A.	Nomination of Nikkia Patrick to the Rooted School Board of Directors	Vote	Mark Quinn
	The Board will nominate Ms. Nikkia Patrick for approval as a voting member of the Rooted School Board of Directors.		
B.	FY 2024 - 2025 Budget Amendment	Vote	Demetria Brown
	Demetria Brown [EdOps] will present the budget amendment proposal for the FY 2024 - 2025 budget.		
	The board will vote on the final budget amendment.		
C.	Public Budget Hearing	Vote	Demetria Brown
	Demetria Brown [Ed Ops] will present the 2025 - 2026 FY budget forecast.		
	The board will vote on the 2025 - 2026 FY budget.		
D.	First Reading Draft Policy - Rooted School Risk & Threat Assessment Policy	Discuss	Frank Ingargiola
	<ul style="list-style-type: none"> The Board will conduct a first reading of the <i>draft</i> - Rooted School Risk & Threat Assessment Policy. 		
E.	First Reading Draft Policy - Title IX Updates	Discuss	Frank Ingargiola
	<ul style="list-style-type: none"> The Board will conduct a first reading of the <i>draft</i> - Title IX Update. An attorney review has been conducted. 		
F.	First Reading Draft Policy - Communicable Diseases Policy	Discuss	Frank Ingargiola
	<ul style="list-style-type: none"> The Board will conduct a first reading of the <i>draft</i> Communicable Diseases Policy. 		
G.	First Reading Draft Policy - Employee & Board Communications Policy	Discuss	Frank Ingargiola

	Purpose	Presenter	Time	
	<ul style="list-style-type: none">• The Board will conduct a first reading of the <i>draft</i> Employee & Board Communications Policy.			
H.	2nd Reading Revised Policy - Rooted School Policy on Interactions with Law Enforcement and Immigration Authorities	Vote	Kaitlin Karpinski	5 m
	The Board will conduct a second reading and a vote on the revised <i>Policy on Interactions with Law Enforcement and Immigration Authorities</i> .			
I.	Luther Speight Auditor	Vote	Mark Quinn	2 m
	The Board will move to vote on the approval of Luther Speight as Rooted School's auditors for the fiscal year 2025 - 2026.			

III. Public Comment / Questions

Our Public Comment period is for members of the public and school community to address the board directly.

Any member of the public wishing to address the board must follow the guidelines below:

1. Sign in prior to the meeting on the **Public Comment Form** (available in-person only).
2. Provide your question(s) and/or comment(s) prior to the start of the meeting on the **Public Comment Form**.
3. The board requests that all comments and/or questions from the public be held to a maximum of three - five minutes.
4. The board secretary will act as the timekeeper.
5. The board will listen, but may not directly respond to any comments/questions during the meeting.
6. Do not use specific student, teacher or administrator names in your comments as our meetings are open to the public and must adhere to *FERPA - Family Educational Rights and Privacy Act*.
7. As such, if your comment is about a private matter, please contact the board via email at mquinn@rootedschool.org

	Purpose	Presenter	Time
IV.	Executive Session: UTNO Negotiations Update & Executive Director Annual Evaluation and 2026 Contract		10:05 AM

I. The board will move into Executive Session to discuss progress on UTNO negotiations.

****Any discussion requiring board action will take place when the board reconvenes in the public session.***

II. The board will move into Executive Session to discuss the SY 2025 - 2026 Executive Director contract.

****Any discussion requiring board action will take place when the board reconvenes in the public session.***

III. The board will move into Executive Session to discuss a possible LA Code of Ethics Violation.

****Any discussion requiring board action will take place when the board reconvenes in the public session.***

A.	Executive Session	Vote	Mark Quinn	45 m
	I. The board will move into Executive Session to discuss progress on UTNO negotiations.			
	II. The board will move into Executive Session to discuss the SY 2025 - 2026 Executive Director contract/salary.			
	III. The board will move into Executive Session to discuss a possible <i>LA Code of Ethics Violation</i> .			

V. **BOARD RETREAT**

BOARD RETREAT AGENDA:

- Review of *Board on Track* article, ***Five Reasons To Hold A Board Retreat***

	Purpose	Presenter	Time
	<ul style="list-style-type: none">• 2024 - 2025 Year-in-Review• Reconnecting to the Mission• 2025 - 2026 Board Goal Setting• 2025 - 2026 Board Fund Raising Campaign• 2025 - 2026 Update on the strategic plan• 2025 - 2026 Board Meeting Calendar• 2025 - 2026 Proposed Committees and setting of one committee goal• Discussion of Possible Working Relationship with Rooted Foundation		

VI. Public Comment / Questions

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7. As such, if your comment is about a private matter, please contact the board via email at mquinn@rootedschool.org

VII. Closing Items

A. Adjourn Meeting	Vote
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We exist to provide our students personal pathways to financial freedom.

Coversheet

Approve Minutes

Section: I. Opening Items
Item: C. Approve Minutes
Purpose: Approve Minutes
Submitted by:
Related Material:
Minutes for MEETING OF THE ROOTED SCHOOL BOARD OF DIRECTORS on April 23, 2025

APPROVED

Rooted School - New Orleans

Minutes

MEETING OF THE ROOTED SCHOOL BOARD OF DIRECTORS

Recognition of Alyse Utley

Date and Time

Wednesday April 23, 2025 at 5:30 PM

Location

IN PERSON MEETING:

Rooted School
6701 Press Drive
SUNO School of Education & Human Development

ROOM : SOCIAL HALL

MEETING NOTIFICATION Apr 23, 2025 05:30 PM Central Time

IN PERSON MEETING:

Rooted School
6701 Press Drive
SUNO School of Education & Human Development

ROOM : SOCIAL HALL

VIRTUAL OPTION:

If you wish to join the meeting virtually:

When: Apr 23, 2025 05:00 PM Central Time

You must register in advance for this meeting

<https://us02web.zoom.us/meeting/register/vRPvNhCdQaqJGyPngV2adg>

After registering, you will receive a confirmation email containing information about joining the meeting.

IMPORTANT PUBLIC NOTICE:

Pursuant to emergency proclamation 30-JCE 2020, the Rooted School New Orleans Board hereby certifies that it will conduct all meetings scheduled for 2024 - 2025, in person (unless otherwise designated), at 6701 Press Dr. in the College of Education Building & Human Development on SUNO's campus in the Social Hall on the 1st Floor.

Board meetings shall be held in this manner until further notice.

Directors Present

A. Utley, L. Diaz, M. Quinn

Directors Absent

S. Glapion

Ex Officio Members Present

F. Ingargiola

Non Voting Members Present

F. Ingargiola

Guests Present

Colette Tippy (remote), D. Brown (remote), Dave Cash (remote), K. Karpinski

I. Opening Items

A. Record Attendance

B. Call the Meeting to Order

M. Quinn called a meeting of the board of directors of Rooted School - New Orleans to order on Wednesday Apr 23, 2025 at 5:36 PM.

C. Approve Minutes

L. Diaz made a motion to approve the minutes from MEETING OF THE ROOTED SCHOOL BOARD OF DIRECTORS on 02-19-25.

A. Utley seconded the motion.

The board **VOTED** unanimously to approve the motion.

Roll Call

S. Glapion Absent
L. Diaz Aye
M. Quinn Aye
A. Utley Aye

D. Board to Accept the Resignation (Term Limit) - Alyse Utley

M. Quinn made a motion to Accept the term-limit resignation.
L. Diaz seconded the motion.
The board **VOTED** unanimously to approve the motion.

Roll Call

A. Utley Abstain
M. Quinn Aye
S. Glapion Absent
L. Diaz Aye

II. Mission Moment

A. Jaron Barnes senior at Rooted School will present the meeting's Mission Moment

- Jaron Barnes presented his experience at Rooted School and related that the school has helped him receive a full scholarship to Loyola University beginning in the fall of 2025.

III. Finance

A. February 2025 & March 2025 Review of Financial Statement

Ms. Brown explained the reasons for the loss of revenue during FY 2024 - 2025.

- Approximating 49 days of cash on hand for the close of FY 2024 - 2025.

CAUSES:

- Low student enrollment for SY 2024 - 2025
- Return of funding due to Level II NOPS directive
- Overall reductions in state and local revenues
- Loss of some grant monies (S.E.E.D. Grant) due to a recent **Executive Order** that terminated the grant prematurely.

IV. Executive Session

A.

The motion was made for the board to move to Executive Session to discuss matters related to collective bargaining.

Alyse Utley made a motion for the board to move into Executive Session.

The motion was seconded by Lucas Diaz.

The motion passed unanimously.

Alyse Utley made a motion for the board to move back into the public session.

The motion was seconded by Lucas Diaz.

The motion passed unanimously.

V. Facilities Update

A. Discussion of the possibility of joining with a UNO facility.

Ms. Karpinski reported on the progress to possibly move from our current SUNO facility to a larger facility that affords some additional space and fewer facility challenges.

She is currently in discussion with UNO leadership.

Frank Ingargiola visited the NOPS facility that previously housed Lycee Francais School. This was not a viable facility for our students.

VI. Current Contracts - Exceeding Threshold

A. Contracts exceeding the \$10,000 threshold.

The following contracts will require an additional signature from our board chairman, Mark Quinn:

- Teach-Lead-Educate - Stovall Consulting
- PowerSchool SIS
- Adams & Reese
- ProCare Therapy
- TB Cleaning

VII. Academic Excellence

A. Ms. Karpinski presented about the progress on Rooted School's academic goals.

Wins:

- Attendance remain at 95% or overall month-over-month
- 90% of students in grades 10 - 12 will be returning to Rooted School for SY 2025 - 2026.
- Rooted will be partnering with a public relations firm to assist in increasing enrollment for SY 2025 - 2026.
- LEAP scores appear to be increasing in math based on recent practice trends.
- *High Quality Instructional Materials* (HQIM) have been used by Rooted School teachers this school year projecting some anticipated growth in LEAP results.

Challenges:

- 9th grade enrollment is down after first-round enrollment.
- First-round enrollment is currently at 133 (Subject to change +/-).
- Overall enrollment will need to be between 160 - 165 students for 2025 - 2026 budget to balance.
- Significant changes to SPS for SY 2025 - 2026 with 75% of a school's performance shifting to LEAP results.

VIII. Closing Items

A. Adjourn Meeting

There being no further business to be transacted, and upon motion duly made, seconded and approved, the meeting was adjourned at 6:30 PM.

Respectfully Submitted,
M. Quinn

Documents used during the meeting

- Executive Summary - February 2025.pdf
- Key Performance Indicators - February 2025.pdf
- Executive Summary March 2025.pdf
- Key Performance Indicators - March 2025.pdf

We exist to provide our students personal pathways to financial freedom.

Coversheet

FY 2024 - 2025 Budget Amendment

Section: II. PUBLIC MEETING PORTION: 2024 - 2025 Budget Amendment &
2025 - 2026 FY Budget Forecast/Approval
Item: B. FY 2024 - 2025 Budget Amendment
Purpose: Vote
Submitted by:
Related Material: ROOT - Monthly Presentation - May 2025 FINAL.pptx



May 2025 Financials

PREPARED JUN'25 BY



Contents



- **Executive Summary**
- **Key Performance Indicators**
- **Cash Forecast**
- **Annotated Financials**

Executive Summary

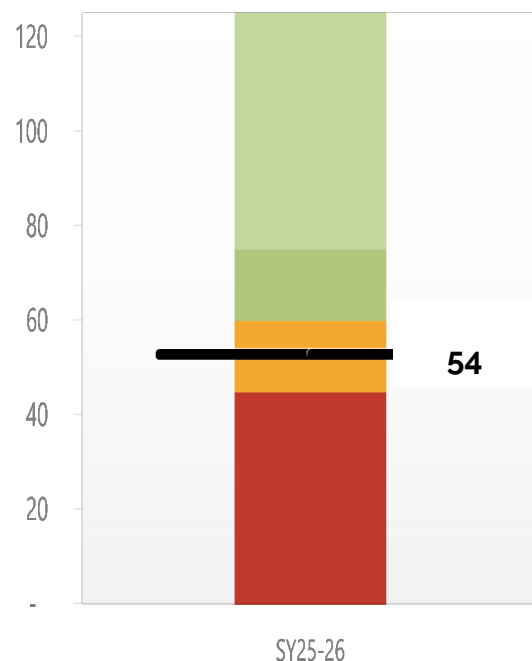
- Rooted School's May 2025 financials show **54 Days of Cash** at year-end, **-2.68% gross margin** and a **net loss of (\$125k)**, which is **\$103k below** the forecasted budget.
 - **Budget Revenues vs Actual Revenues**
 - On a YTD basis for the period ending 5/31/2025, Rooted School has received revenue that is **\$110k below** budgeted revenues for the fiscal year.
 - On a YTD basis for the period ending 5/31/2025, Rooted School incurred expenses that were **\$335k less** than the originally forecasted budgeted expenditures.
 - **Highlighted Budgetary Trend Analysis:**
 - Forecasted revenues are projected to be approximately **\$202k less** than originally budgeted due to reductions in State and Local Revenues as anticipated per NOLA guidance earlier this year.
 - Rooted School's FY 2025 Ending Cash Balance is anticipated to be approximately **\$442k** which is **\$392k less** than originally budgeted.

Overall, year-end net loss of (\$125k) and ~\$442k in cash expected at year-end.

Key Performance Indicators

Days of Cash

Cash balance at year-end divided by average daily expenses

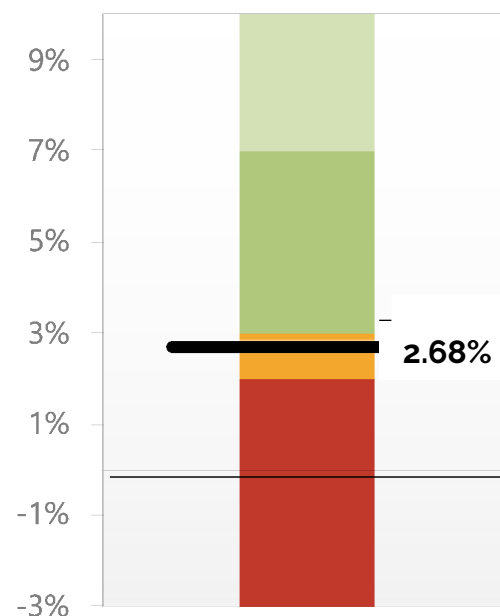


54 DAYS OF CASH AT YEAR'S END

The school will end the year with 129 days of cash. This is above the recommended 60 days, and 28 more day(s) than last month

Gross Margin

Revenue less expenses, divided by revenue

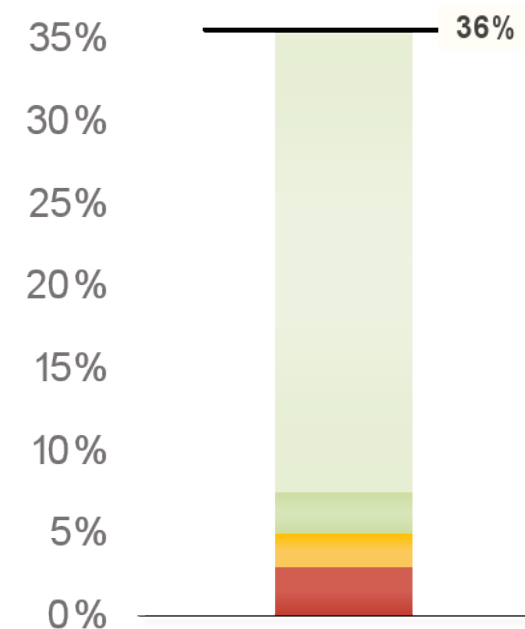


-2.68% GROSS MARGIN

The forecasted net income is -\$125k, which is \$103k below the budget. It yields a -2.68% gross margin.

Fund Balance %

Forecasted Ending Fund Balance / Total Expenses



35.72% AT YEAR'S END

The school is projected to end the year with a fund balance of \$442,664. Last year's fund balance was \$1,193,234.



QUESTIONS?

Please contact your EdOps Finance Team:

Demetria Brown

demetria@ed-ops.com

N/A

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Coversheet

Public Budget Hearing

Section: II. PUBLIC MEETING PORTION: 2024 - 2025 Budget Amendment &
2025 - 2026 FY Budget Forecast/Approval
Item: C. Public Budget Hearing
Purpose: Vote
Submitted by:
Related Material: ROOT - SY25-26 Budget v1.2 - 06.17.2025.pptx

rootedschool

SY 25-26

Operating Budget

PREPARED **JUNE 17, 2025** BY

EdOps

Executive Summary

Budget Development Process

- Your FY 2025-2026 budget is based on a combination of data sources including: historical revenue data, anticipated pupil headcount and per pupil funding allocations, as well as grant availability.
- Historical expense data has been increased by CPI, specific programmatic needs, and staff salary increases.
- Enrollment data projections were based on an anticipated enrollment count of 155 students, which is in alignment with leadership's analysis of returning students and students selecting Rooted as first choice.

Timeline

- This budget covers July 1, 2025 through June 30, 2026.
- This budget also includes a projection for July 1, 2026 through June 30, 2027.

• Key Assumptions

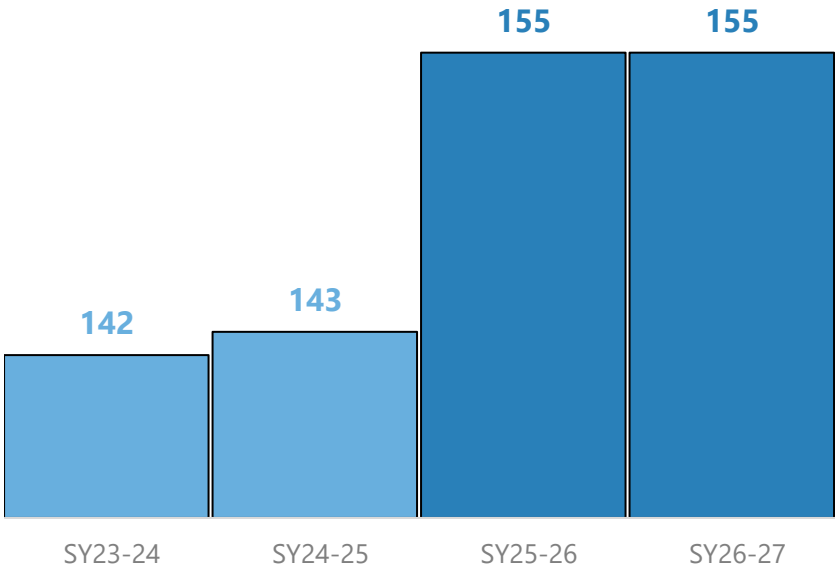
- Enrollment projected anticipates 155 students for FY 25-26.
- MFP funding by NOLA is expected to remain relatively flat for the FY 25-26 academic year.
- Expenses have been adjusted in accordance with CPI inflation assumptions.
- Unpredicted expenses will be taken from Cash on Hand.

• Key Changes

- A conservative approach to budgeting has been adopted.
- Revenues and expenses have been estimated in consultation with the administration based on all available information provided from multiple data sources.
- Increases in personnel services have been budgeted in consultation with administration based on projected available revenues for the upcoming school year.
- Staffing positions have been reviewed by management and strategic adjustments have been made to ensure academic needs are met in alignment with budgetary constraints.

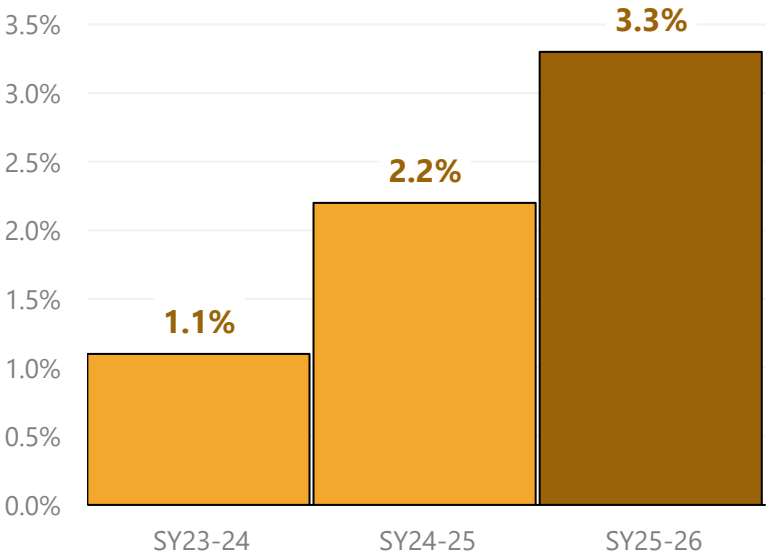
Key Assumptions and Historical Context

ENROLLMENT



For FY 26, Rooted is projecting student enrollment to reach 155 students, which is an increase of 12 students when compared to FY 25.

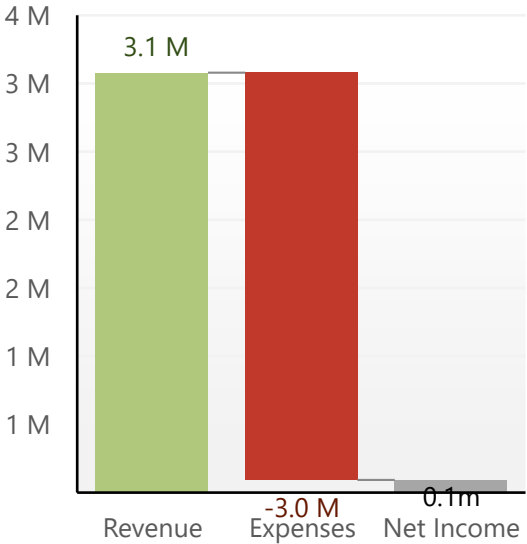
SALARY INCREASE



For FY 26, Rooted has budgeted an average salary increase of approximately 3.3%.

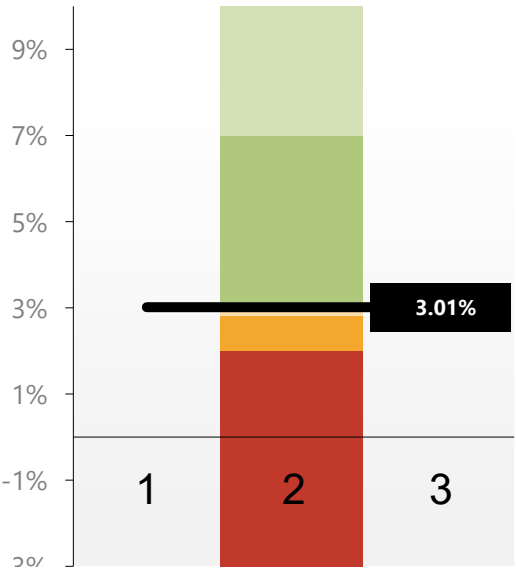
Net Income and Gross Margin

NET INCOME



Revenue	3,079,012
Expenses	2,986,197
Net Income	92,814

GROSS MARGIN



Revenue	3,079,012
Expenses	2,986,197
Net Income	92,814
Gross Margin	3.01%

Gross Margin = Net Income / Revenue

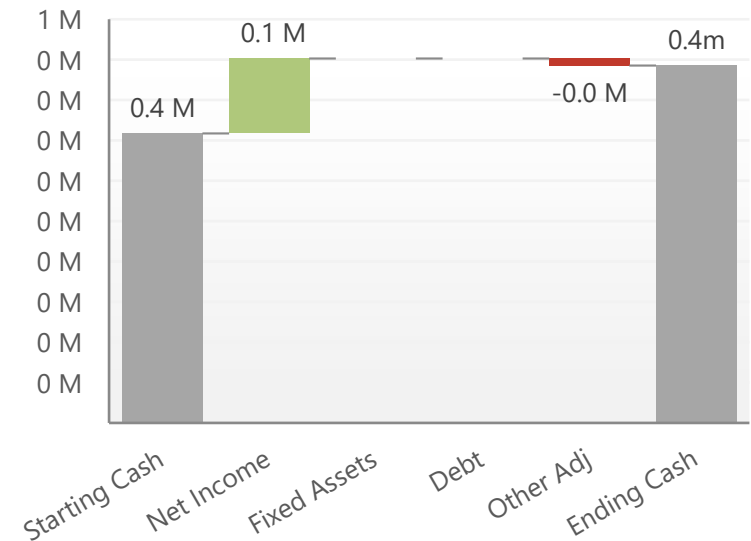
COMMENTS

The forecasted net income is \$92,814 on \$3,079,012 in revenue. This yields 3.01% in gross margin.

Due to enrollment shortfalls in the FY 25 school year net income for FY 25 fell short of budget and is currently projected to be approximately (\$125,958). Based on enrollment of 155 students for next year, Rooted is projected to generate net income of \$92,814 for FY 26, which represents a projected positive year over year increase of \$218,772.

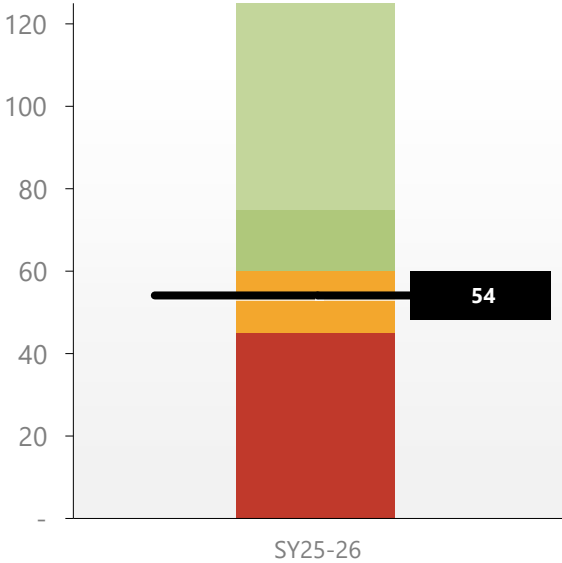
Ending Cash and Days of Cash

ENDING CASH WATERFALL



Starting Cash	358,580
Net Income	92,814
Fixed Assets	-
Debt	-
Other Adj	(8,731)
Net Annual Cash Increase	84,083
Ending Cash	442,664

DAYS OF CASH



COMMENTS

We are predicting 54 days of cash at 6/30/26. This is based upon ending the year with 442,664 in cash.

The \$84,083 change in cash for FY 26 is based in large part on Rooted achieving its student enrollment goals. Due to enrollment shortfalls in the FY 25 school year, Rooted is forecasted to experience a negative change in cash of (\$127,216) forecasted change in cash from the previous year.

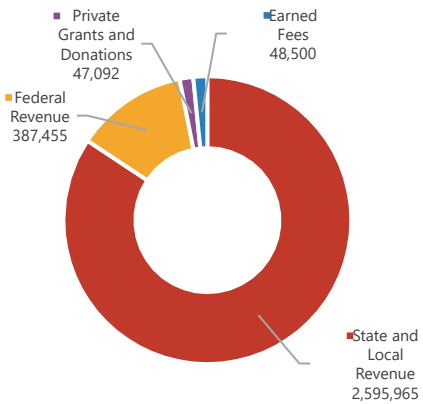
Through careful budgeting and accurate enrollment estimates Rooted can reach its positive cash flow goal.

SY26 Budget

Income Statement		SY24-25	SY25-26	SY26-27
Revenue				
State and Local Revenue		2,221,020	2,595,965	2,482,694
Federal Revenue		379,879	387,455	390,587
Private Grants and Donations		41,377	47,092	48,504
Earned Fees		175,127	48,500	49,270
Total Revenue		2,817,403	3,079,012	2,971,056
Expenses				
Salaries		1,442,710	1,278,500	1,308,913
Benefits and Taxes		427,407	278,674	281,072
Purchased Professional & Technical Services		431,541	512,468	541,693
Purchased Property Services		232,439	230,522	231,572
Other Purchased Services		170,670	423,248	430,691
Supplies		187,672	200,421	213,154
Miscellaneous		50,922	62,364	60,343
Total Expenses		2,943,360	2,986,197	3,067,438
Net Income		(125,958)	92,814	(96,382)
Adjustments To Cash Flow				
Add Depreciation		1,385	-	-
Operating Fixed Assets		(0)	-	-
Other Operating Activities		(14,397)	(8,731)	297
Financing Activities		-	-	-
Equity		11,753	-	-
Total Cash Flow Adjustments		(1,258)	(8,731)	297
Net cash increase for year		(127,216)	84,083	(96,085)

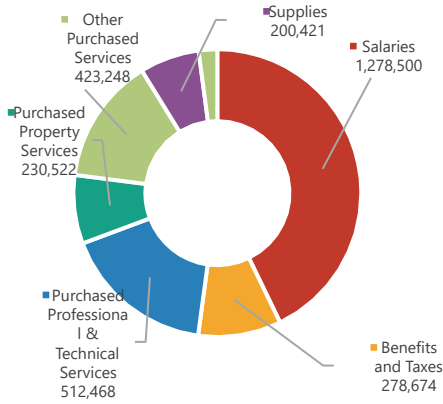
REVENUE

We have budgeted **\$3,079,012** in revenue based upon 155 students, . The largest components of revenue are \$2.6m (84.3%) in State and Local Revenue and \$387k (12.6%) in Federal Revenue.



EXPENSES

We have budgeted **\$2,986,197** in expenses based on 20 staff, a 7.8 student to teacher ratio, and 104,364 in square feet for the facility. The largest components of expense are \$1,278,500 (42.8%) in Salaries and \$512,468 (17.2%) in Purchased Professional & Technical Services.

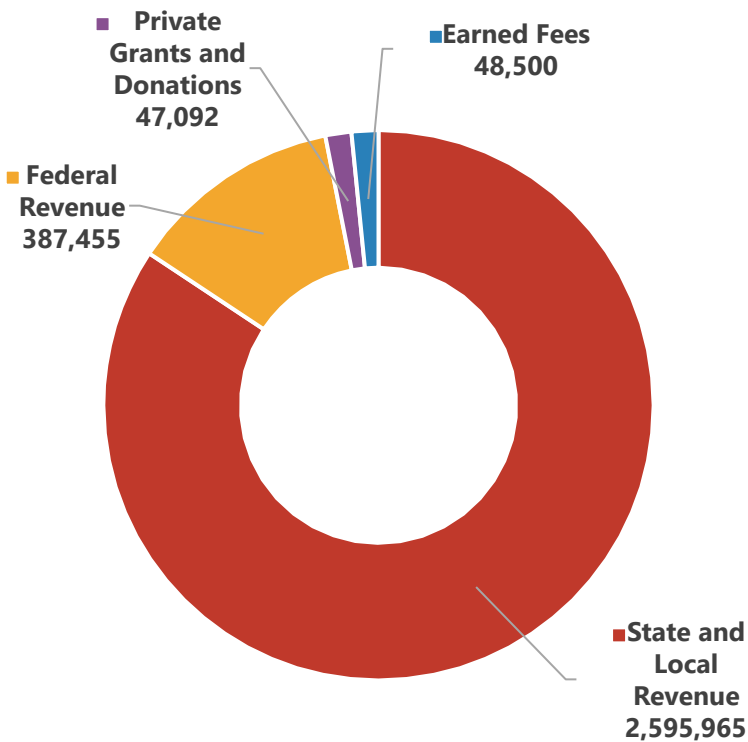


ADJUSTMENTS TO CASH FLOW

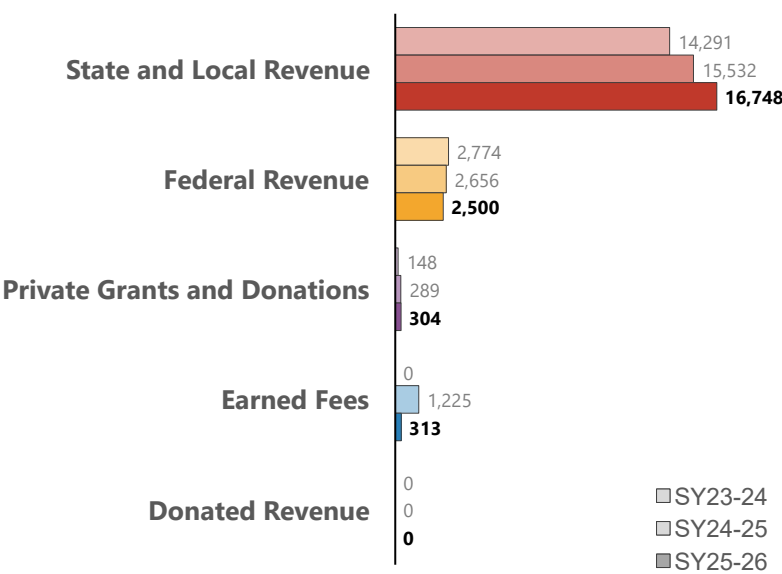
We have budgeted a **\$84,083** gain in cash for the upcoming year. The largest adjustments are \$92,814 in Net Income and (\$8,731) in Other Operating Activities.

Revenue | Overview

SY26 BUDGETED REVENUE %



REVENUE PER STUDENT



COMMENTS

We have budgeted **\$3,079,012** in revenue for FY 26, which is \$262k more than the amount forecasted for the year before.

The largest components of revenue are State and Local Revenue (84.3%) and Federal Revenue (12.6%).

Highlighted year-to-year changes:

- \$375k increase (7.8% more per student) in State and Local Revenue
- \$127k decrease (74.4% less per student) in Earned Fees

Revenue | Federal Revenue Detail

Selected Accounts

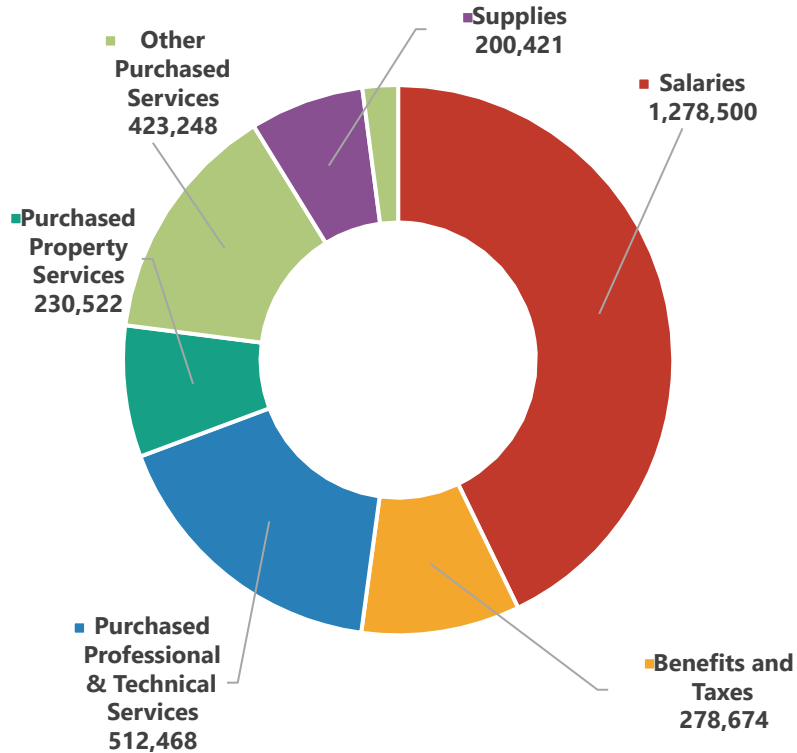
Total Amount (\$)

\$ Per Student

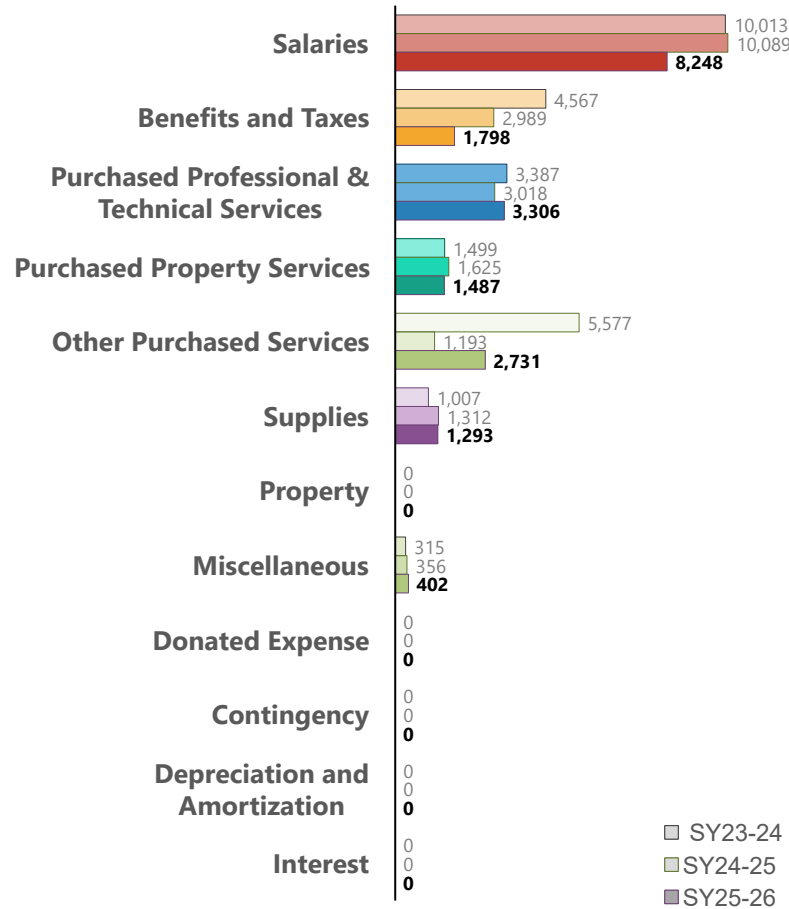
Federal Revenue Category	SY23-24		SY23-24	
	SY23-24	<div></div> \$397k	SY23-24	<div></div> 2,794
	SY24-25	<div></div> \$380k	SY24-25	<div></div> 2,656
	SY25-26	<div></div> \$387k	SY25-26	<div></div> 2,500
School Food Service External Comment...	SY23-24	<div></div> \$101k	SY23-24	<div></div> 713
	SY24-25	<div></div> \$141k	SY24-25	<div></div> 985
	SY25-26	<div></div> \$126k	SY25-26	<div></div> 810

Expenses | Overview

SY26 BUDGETED EXPENSE %



EXPENSE PER STUDENT



COMMENTS

We have budgeted **\$2,986,197** in expenses for FY 26, which is \$43k more than the amount forecasted for the year before.

The largest components of expenses are Salaries (42.8%) and Purchased Professional & Technical Services (17.2%).

Highlighted year-to-year changes:

- \$253k increase (128.8% more per student) in Other Purchased Services
- \$164k decrease (18.2% less per student) in Salaries
- \$149k decrease (39.8% less per student) in Benefits and Taxes
- \$81k increase (9.6% more per student) in Purchased Professional & Technical Services



QUESTIONS?

Please contact your
EdOps School Finance Manager:

Demetria Brown
demetria@edops.com

Coversheet

First Reading Draft Policy - Rooted School Risk & Threat Assessment Policy

Section:	II. PUBLIC MEETING PORTION: 2024 - 2025 Budget Amendment & 2025 - 2026 FY Budget Forecast/Approval
Item:	D. First Reading Draft Policy - Rooted School Risk & Threat Assessment Policy
Purpose:	Discuss
Submitted by:	
Related Material:	DRAFT Rooted School Risk & Threat Assessment Policy.pdf

Rooted School: Responding to Students Who Pose a Risk to Themselves or Others

First Reading – June 20, 2025

Policy Statement:

The safety and well-being of all members of the school community, including students, staff, and visitors, is of paramount importance. Rooted School is committed to providing a safe environment where all students can learn without fear of harm.

This policy outlines the expectations, procedures, and responsibilities of staff when responding to students who exhibit behaviors that pose a potential risk to themselves (e.g., suicidal ideation, self-harm) or others (e.g., violent behavior, threats).

Purpose:

To ensure a consistent, compassionate, and systematic response to students who may pose a risk to themselves or others, while prioritizing safety, mental health support, and appropriate intervention.

Scope:

This policy applies to all school staff, including teachers, counselors, administrators, school safety officers, and any other personnel interacting with students.

I. Identification and Reporting:

Immediate Threat - When a student exhibits behavior that poses an immediate danger to themselves or others, staff must:

- Call **911** or the **New Orleans Police Department (NOPD)** at (504) 821-2222.
- Notify the **designated school safety team** immediately to activate the emergency response.

II. Concerning Behavior:

Any staff member who observes concerning behavior that may pose a risk must immediately report it to the **principal** or **school counselor** following the school's established reporting procedures.

- Reporting channels may include:
 - In-person reports
 - Secure digital reporting forms
 - Anonymous tip lines (if available)

III. Key Contacts:

- **Principal:** Ms. Jemiah Boagni

- **School Counselor:** Mr. Mike Herbers
- **School Safety Officer:** Ms. Trinicia Torregano

IV. Immediate Response:

- **Removal from Environment:**

If it is safe to do so, the student must be moved to a supervised, private location, away from the classroom or any environment where they may pose a risk to themselves or others.

- **Initiate Threat Assessment Protocol:**

Upon identification of a potential risk, the **behavioral threat assessment team** will be activated. This team will include:

- **Principal**
- **School Counselor**
- **School Safety Officer**
- **School Psychologist** (if available)
- **Mental Health Professionals**

- **Engage Mental Health Professionals:**

The **school psychologist, school counselor, or an external mental health provider** must be engaged promptly to assess the student's needs and determine the level of intervention required.

- **Parent/Guardian Notification:**

The **parent/guardian** must be notified as soon as possible, unless doing so would place the student at greater risk. The notification should include details about the behavior, the school's response, and any further actions being taken.

V. Risk Assessment and Intervention:

- **Risk Screening**

A comprehensive risk screening must be conducted using validated tools, including:

- **Columbia Suicide Severity Rating Scale (C-SSRS)** for self-harm concerns.
- **Virginia Student Threat Assessment Guidelines (VSTAG)** for threats to others.

VI. Risk Classification and Intervention:

Based on the results of the assessment, the following levels of risk will be determined and appropriate interventions will be implemented:

- **Low Risk:** Provide counseling services, increase monitoring, and arrange follow-up meetings.
- **Moderate Risk:** Develop a safety plan, involve mental health services, and possibly limit school access temporarily.

- **High Risk:** Immediately refer for emergency mental health evaluation or law enforcement intervention; possible hospitalization or alternative placement.

VII. Re-Entry Planning:

- **Re-Entry Meeting**

A re-entry meeting will be held prior to the student returning to school. The meeting will include:

- The student
- Parent/guardian
- School counselor
- Administrator

- **Safety/Reintegration Plan**

A **Safety/Reintegration Plan** must be created that may include:

- Modified schedule
- Check-ins with a trusted staff member
- Ongoing mental health support
- Peer supports or classroom accommodations

- **Reintegration and Monitoring:**

The student's return to school will be monitored for an appropriate period to ensure they are reintegrating safely and receiving the necessary support.

VIII. Documentation:

- **Confidential Records**

All incidents, risk assessments, decisions, and follow-up actions must be documented in a **confidential manner** in accordance with:

- **FERPA** (Family Educational Rights and Privacy Act)
- **HIPAA** (Health Insurance Portability and Accountability Act, when applicable)
- **Louisiana state law** regarding student privacy and mental health information.

IX. Record Retention:

All documentation must be retained securely and in accordance with district policies on record retention.

X. Staff Training and Prevention:

- **Annual Staff Training**

All school staff must receive annual training on:

- Recognizing **warning signs of self-harm** and **violent behavior**
- Implementing **de-escalation techniques**
- Proper use of **reporting and referral systems**
- Trauma-informed care and **mental health first aid**

XI. Promotion of Positive School Climate:

- The school will promote a positive school climate by integrating **social-emotional learning (SEL)** programs into the curriculum. These programs will focus on resilience, empathy, and conflict resolution.

XII. Collaboration with External Agencies:

- **Memoranda of Understanding (MOUs)**

The school district will establish **MOUs** with the following external agencies to ensure coordinated response in cases of student threats:

- **Local Mental Health Agencies:**

- **New Orleans Behavioral Health Center/Manning Family Children's:** (504)896-7200
- **Transfer Center (for referrals):** (504)896-6673
- **Metropolitan Family Services:** (504)568-3134

- **Law Enforcement:**

- **New Orleans Police Department (NOPD):** (504) 286-3355
- **NOPD District 3 (Rooted's District):** 504-658-6030 or 911

- **Louisiana Crisis Response Network:**

- Lifeline: 988
- VIA Link: 211
- Metropolitan Crisis Line (local): (504) 826-2675
- Trevor Project Crisis (LGBTQ+): 678-678

- **Shared Crisis Response Protocols**

The school district will develop shared protocols for communication and crisis response between the school, law enforcement, and mental health agencies to ensure a unified, timely response.

XIII. Enforcement and Compliance:

- **Staff Responsibility**

All staff members are required to adhere to the provisions of this policy. Failure to follow these procedures may result in disciplinary action.

- **Policy Review**

This policy will be reviewed annually by the school district's policy review committee to ensure its continued effectiveness and compliance with applicable laws and regulations.

Adopted By:

- **Rooted School**
- **Date of Adoption:** June 20, 2025

DRAFT

Coversheet

First Reading Draft Policy - Title IX Updates

Section:	II. PUBLIC MEETING PORTION: 2024 - 2025 Budget Amendment & 2025 - 2026 FY Budget Forecast/Approval
Item:	E. First Reading Draft Policy - Title IX Updates
Purpose:	Discuss
Submitted by:	
Related Material:	DRAFT Rooted School Title IX Policy.pdf

Policy: Title IX - Sex Non-Discrimination

Title IX - Sex Non-Discrimination

I. PURPOSE

Students are protected from discrimination on the basis of sex pursuant to Title IX of the Education Amendments of 1972. The purpose of this policy is to provide equal educational opportunity for all students and to prohibit discrimination on the basis of sex.

II. GENERAL STATEMENT OF POLICY

A. Rooted School provides equal educational opportunity for all students and does not unlawfully discriminate on the basis of sex. No student will be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any educational program or activity operated by the school on the basis of sex.

B. The school prohibits sexual harassment that occurs within its education programs and activities. When the school has actual knowledge of sexual harassment in its education program or activity against a person in the United States, it shall promptly respond in a manner that is not deliberately indifferent.

C. This policy applies to sexual harassment that occurs within the school's education programs and activities and that is committed by a school employee, student, or other members of the school community. This policy does not apply to sexual harassment that occurs off school grounds, in a private setting, and outside the scope of the school's education programs and activities. This policy does not apply to sexual harassment that occurs outside the geographic boundaries of the United States, even if the sexual harassment occurs in the school's education programs or activities.

D. Any student, parent, or guardian having questions regarding the application of Title IX and its regulations and/or this policy and grievance process should discuss them with the Title IX Coordinator, the Office for Civil Rights, or both.

The school's Title IX Coordinator is:

Executive Director/Principal, Kaitlin Karpinski
6701 Press Drive
kkarpinski@rootedschool.org

Office for Civil Rights Contact Information:

U.S. Department of Education
Office for Civil Rights
400 Maryland Avenue, SW
Washington, DC 20202-1100
800-421-3481
OCR@ed.gov
<https://www.ed.gov/ocr>

Concerns about a Title IX incident? Complete the H.I.B. Form to report it to the administrator.

III. DEFINITIONS

A. "Actual knowledge" means notice of sexual harassment or allegations of sexual harassment to the school's Title IX Coordinator or to any employee of the school. Imputation of knowledge based solely on

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vicarious liability or constructive notice is insufficient to constitute actual knowledge. This standard is not met when the only official of the school with actual knowledge is the respondent.

B. “Complainant” means a person who is alleged to be the victim of conduct that could constitute sexual harassment under Title IX. The Title IX Coordinator who signs a formal complaint is not a complainant unless the Title IX Coordinator is alleged to be the victim of the conduct described in the formal complaint.

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C. “Day” or “days” means, unless expressly stated otherwise, business days (i.e. day(s) that the school office is open for normal operating hours, Monday - Friday, excluding State-recognized holidays).

D. “Deliberately indifferent” means clearly unreasonable in light of the known circumstances. The school is deliberately indifferent only if its response to sexual harassment is clearly unreasonable in light of the known circumstances.

E. “Education program or activity” means locations, events, or circumstances for which the school exercises substantial control over both the respondent and the context in which the sexual harassment occurs and includes school education programs or activities that occur on or off school property.

F. “Formal complaint” means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the school investigate the allegation of sexual harassment.

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1. A formal complaint filed by a complainant must be a physical document or an electronic submission. The formal complaint must contain the complainant’s physical or digital signature, or otherwise indicate that the complainant is the person filing the formal complaint, and must be submitted to the Title IX Coordinator in person, by mail, or by email.

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2. A formal complaint shall state that, at the time of filing the formal complaint, the complainant was participating in, or attempting to participate in, an education program or activity of the school with which the formal complaint is filed.

G. “Informal resolution” means options for resolving a formal complaint that do not involve a full investigation and adjudication. Informal resolution may encompass a broad range of conflict resolution strategies, including mediation or restorative justice.

H. “Relevant questions” and “relevant evidence” are questions, documents, statements, or information that are related to the allegations raised in a formal complaint. Relevant evidence includes evidence that is both inculpatory and exculpatory. Questions and evidence about the complainant’s sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant’s prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant’s prior sexual behavior with respect to the respondent and are offered to prove consent.

I. “Remedies” means actions designed to restore or preserve the complainant’s equal access to education after a respondent is found responsible. Remedies may include the same individualized services that constitute supportive measures, but need not be non-punitive or non-disciplinary, nor must they avoid burdening the respondent.

J. “Respondent” means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment under Title IX.

K. “Sexual harassment” means any of three types of misconduct on the basis of sex that occurs in a school education program or activity and is committed against a person in the United States:

1. *Quid pro quo* harassment by a school employee (conditioning the provision of an aid, benefit, or service of the school on an individual's participation in unwelcome sexual conduct);
2. Unwelcome conduct that a reasonable person would find so severe, pervasive, and objectively offensive that it denies a person equal educational access; or
3. Any instance of sexual assault (as defined in the Clery Act, 20 United States Code section 1092(f)(6)A(v)), dating violence, domestic violence, or stalking (as defined in the Violence Against Women Act, 34 United States Code section 12291).

L. "Supportive measures" means individualized services provided to the complainant or respondent without fee or charge that are reasonably available, non-punitive, non-disciplinary, not unreasonably burdensome to the other party, and designed to ensure equal educational access, protect safety, and deter sexual harassment. Supportive measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, alternative educational services

M. "Title IX Personnel" means any person who addresses, works on, or assists with the school's response to a report of sexual harassment or formal complaint, and includes persons who facilitate informal resolutions. The following are considered Title IX Personnel:

1. "Title IX Coordinator" means an employee of the school that coordinates the school's efforts to comply with and carry out its responsibilities under Title IX. The Title IX Coordinator is responsible for acting as the primary contact for the parties and ensuring that the parties are provided with all notices, evidence, reports, and written determinations to which they are entitled under this policy and grievance process. The Title IX Coordinator is also responsible for effective implementation of any supportive measures or remedies. The Title IX Coordinator must be free from conflicts of interest and bias when administrating the grievance process.

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2. "Investigator" means a person who investigates a formal complaint. The investigator of a formal complaint may not be the same person as the decision-maker or the appellate decision-maker. The Investigator may be a school employee, school official, or a third party designated by the school.

3. "Decision-maker" means a person who makes a determination regarding responsibility after the investigation has concluded. The decision-maker cannot be the same person as the Title IX Coordinator, the Investigator, or the appellate decision-maker.

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4. "Appellate Decision-maker" means a person who considers and decides appeals of determinations regarding responsibility and dismissals of formal complaints. The appellate decision-maker cannot be the same person as the Title IX Coordinator, Investigator, or decision-maker. The appellate decision-maker may be a school employee, or a third party designated by the school.

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The Title IX Coordinator of the school may delegate functions assigned to a specific school employee under this policy, including but not limited to the functions assigned to the Title IX Coordinator [i.e. Executive director/Principal], Investigator, decision-maker, appellate decision-maker, and facilitator of informal resolution processes, to any suitably qualified individual and such delegation may be rescinded by the Title IX Coordinator at any time. The school may also, in its discretion, appoint suitably qualified persons who are not school employees to fulfill any function under this policy, including, but not limited to, Investigator, decision-maker, appellate decision-maker, and facilitator of informal resolution processes.

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IV. BASIC REQUIREMENTS FOR GRIEVANCE PROCESS

A. Equitable Treatment

1. The school shall treat complainants and respondents equitably. However, equality or parity with respect to supportive measures provided to complainants and respondents is not required.

2. The school will not impose any disciplinary sanctions or take any other actions against a respondent that do not constitute supportive measures until it has completed this grievance process and the respondent has been found responsible.

3. The school will provide appropriate remedies to the complainant any time a respondent is found responsible.

B. Objective and Unbiased Evaluation of Complaints

1. Title IX Personnel, including the Title IX Coordinator, Investigator, decision-maker, and appellate decision-maker, shall be free from conflicts of interest or bias for or against complainants or respondents generally or a specific complainant or respondent.

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2. Throughout the grievance process, Title IX Personnel will objectively evaluate all relevant evidence, inculpatory and exculpatory, and shall avoid credibility determinations based solely on a person's status as a complainant, respondent, or witness.

3. Title IX Personnel will presume that the respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.

C. Confidentiality

The school will keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any individual who has made a report or filed a formal complaint of sexual harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except as may be permitted by the Family Educational Rights and Privacy Act (FERPA), 20 United States Code section 1232g, FERPA regulations, 34 Code of Federal Regulations part 99 or as required by law, or to carry out the purposes of 34 Code of Federal Regulations part 106, including the conduct of any investigation, hearing, or judicial proceeding arising thereunder (i.e., the school's obligation to maintain confidentiality shall not impair or otherwise affect the complainants and respondents receipt of the information to which they are entitled with respect to the investigative record and determination of responsibility).

D. Right to an Advisor; Right to a Support Person

Complainants and respondents have the right, at their own expense, to be assisted by an advisor of their choice during all stages of any grievance proceeding, including all meetings and investigative interviews. The advisor may be, but is not required to be, an attorney. In general, an advisor is not permitted to speak for or on behalf of a complainant or respondent, appear in lieu of complainant or respondent, participate as a witness, or participate directly in any other manner during any phase of the grievance process.

A complainant or respondent with a disability may be assisted by a support person throughout the grievance process, including all meetings and investigative interviews, if such accommodation is necessary. A support person may be a friend, family member, or any individual who is not otherwise a potential witness. The support person is not permitted to speak for or on behalf of a complainant or respondent, appear in lieu of complainant or respondent, participate as a witness, or participate directly in any other manner during any phase of the grievance process.

E. Notice

The school will send written notice of any investigative interviews or meetings to any party whose participation is invited or expected. The written notice will include the date, time, location, participants, and purpose of the meeting or interview, and will be provided to allow sufficient time for the party to prepare to participate.

F. Consolidation

The school may, in its discretion, consolidate formal complaints as to allegations of sexual harassment against more than one respondent, or by more than one complainant against one or more respondents, or by one party against the other party, where the allegations of sexual harassment arise out of the same facts or circumstances.

G. Evidence

1. During the grievance process, the school will not require, allow, rely upon, or otherwise use questions or evidence that constitute or seek disclosure of information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.
2. The school shall not access, consider, disclose, or otherwise use a party's medical, psychological, and similar treatment records unless the school obtains the party's voluntary, written consent.

H. Burden of Proof

1. The burden of gathering evidence and the burden of proof shall remain upon the school and not upon the parties.
2. The grievance process shall use a preponderance of the evidence standard (i.e. whether it is more likely than not that the respondent engaged in sexual harassment) for all formal complaints of sexual harassment, including when school employees are respondents.

I. Timelines

1. Any informal resolution process must be completed within thirty (30) calendar days following the parties' agreement to participate in such informal process.
2. An appeal of a determination of responsibility or of a decision dismissing a formal complaint must be received by the school within five (5) days of the date the determination of responsibility or dismissal was provided to the parties.
3. Any appeal of a determination of responsibility or of a dismissal will be decided within thirty (30) calendar days of the day the appeal was received by the School.
4. The school will seek to conclude the grievance process, including any appeal, within 120 calendar days of the date the formal complaint was received by the School.

Although the school strives to adhere to the timelines described above, in each case, the school may extend the time frames for good cause. Good cause may include, without limitation: the complexity of the allegations; the severity and extent of the alleged misconduct; the number of parties, witnesses, and the types of other evidence (e.g., forensic evidence) involved; the availability of the parties, advisors, witnesses, and evidence (e.g., forensic evidence); concurrent law enforcement activity; intervening school holidays, breaks, or other closures; the need for language assistance or accommodation of disabilities; and/or other unforeseen circumstances.

J. Potential Remedies and Disciplinary Sanctions

1. The following is the range of possible remedies that the school may provide a complainant and disciplinary sanctions that the school might impose upon a respondent, following determination of responsibility: counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, mutual or unilateral restrictions on contact between the parties, changes in

work locations, leaves of absence, monitoring of certain areas of the school buildings or property, warning, suspension, exclusion, expulsion, transfer, remediation, termination, or discharge.

2. If the decision-maker determines a student-respondent is responsible for violating this policy, the decision-maker will recommend appropriate remedies, including disciplinary sanctions /consequences. The Title IX Coordinator will notify all parties of the recommended remedies, such that an authorized administrator can consider the recommendation(s) and implement appropriate remedies in compliance with all student discipline policies, the Individuals with Disabilities Education Improvement Act (IDEA) and/or Section 504 of the Rehabilitation Act of 1972, and their respective implementing regulations.

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V. REPORTING PROHIBITED CONDUCT

A. Any student who believes they have been the victim of unlawful sex discrimination or sexual harassment, or any person (including the parent of a student) with actual knowledge of conduct which may constitute unlawful sex discrimination or sexual harassment toward a student should report the alleged acts as soon as possible to the Title IX Coordinator [i.e. Executive director/Principal].

B. Any employee of the school who has experienced, has actual knowledge of, or has witnessed unlawful sex discrimination, including sexual harassment, or who otherwise becomes aware of unlawful sex discrimination, including sexual harassment, must promptly report the allegations to the Title IX Coordinator without screening or investigating the report or allegations.

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C. A report of unlawful sex discrimination or sexual harassment may be made at any time, including during non-business hours, and may be made in person, by mail, by telephone, or by e-mail using the Title IX Coordinator's contact information. A report may also be made by any other means that results in the Title IX Coordinator receiving the person's verbal or written report.

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D. Sexual harassment may constitute both a violation of this policy and criminal law. To the extent the alleged conduct may constitute a crime, the school may report the alleged conduct to law enforcement authorities. The school encourages complainants to report criminal behavior to the police immediately.

VI. INITIAL RESPONSE AND ASSESSMENT BY THE TITLE IX COORDINATOR

A. When the Title IX Coordinator receives a report, the Title IX Coordinator shall promptly contact the complainant confidentially to discuss the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.

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B. The school will offer supportive measures to the complainant whether or not the complainant decides to make a formal complaint. The school must maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the school's ability to provide the supportive measures. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures.

C. If the complainant does not wish to file a formal complaint, the allegations will not be investigated by the school unless the Title IX Coordinator determines that signing a formal complaint to initiate an investigation over the complainant's wishes is not clearly unreasonable in light of the known circumstances.

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D. Upon receipt of a formal complaint, the school must provide written notice of the formal complaint to the known parties with sufficient time to prepare a response before any initial interview. This written notice must contain:

1. The allegations of sexual harassment, including sufficient details known at the time, the identities of the parties involved in the incident (if known), the conduct allegedly constituting sexual harassment, and the date and location of the alleged incident, if known;
2. A statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility will be made at the conclusion of the grievance process;
3. A statement explaining that the parties may have an advisor of their choice, who may be, but is not required to be, an attorney;
4. A statement that the parties may inspect and review evidence gathered pursuant to this policy;
5. A statement informing the parties of any code of conduct provision that prohibits knowingly making false statements or knowingly submitting false information; and
6. A copy of this policy.

VII. STATUS OF RESPONDENT DURING PENDENCY OF FORMAL COMPLAINT

A. Emergency Removal of a Student

The school may remove a student-respondent from an education program or activity of the school on an emergency basis before a determination regarding responsibility is made if:

1. The school undertakes an individualized safety and risk analysis;
2. The school determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal of the student-respondent; and
3. The school determines the student-respondent poses such a threat, it will notify the student-respondent and the student-respondent will have an opportunity to challenge the decision immediately following the removal. In determining whether to impose emergency removal measures, the Title IX Coordinator Title IX Coordinator shall consult related school policies, including Student Discipline. The school must take into consideration applicable requirements of the Individuals with Disabilities Education Act and Section 504 of the Rehabilitation Act of 1973, prior to removing a special education student or Section 504 student on an emergency basis.

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B. Employee Administrative Leave

The school may place a non-student employee on administrative leave during the pendency of the grievance process of a formal complaint. Such leave will typically be paid leave unless circumstances justify unpaid leave in compliance with legal requirements. The school must take into consideration applicable requirements of Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act prior to removing an individual with a qualifying disability.

VIII. INFORMAL RESOLUTION OF A FORMAL COMPLAINT

A. At any time prior to reaching a determination of responsibility, informal resolution may be offered and facilitated by the school at the school's discretion, but only after a formal complaint has been received by the school.

B. The school may not require as a condition of enrollment or continued enrollment, or of employment or continued employment, or enjoyment of any other right, waiver of the right to a formal investigation and adjudication of formal complaints of sexual harassment.

C. The informal resolution process may not be used to resolve allegations that a school employee sexually harassed a student.

D. The school will not facilitate an informal resolution process without both parties' agreement, and will obtain their voluntary, written consent. The school will provide to the parties a written notice disclosing the allegations, the requirements of the informal resolution process including the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations, the parties' right to withdraw from the informal resolution process, and any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared.

E. At any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint.

IX. DISMISSAL OF A FORMAL COMPLAINT

A. Under federal law, the school must dismiss a Title IX complaint, or a portion thereof, if the conduct alleged in a formal complaint or a portion thereof:

1. Would not meet the definition of sexual harassment, even if proven;
2. Did not occur in the school's education program or activity; or
3. Did not occur against a person in the United States.

B. The school may, in its discretion, dismiss a formal complaint or allegations therein if:

1. The complainant informs the Title IX Coordinator in writing that the complainant desires to withdraw the formal complaint or allegations therein;
2. The respondent is no longer enrolled or employed by the school; or
3. Specific circumstances prevent the school from gathering sufficient evidence to reach a determination.

C. The school shall provide written notice to both parties of a dismissal. The notice must include the reasons for the dismissal.

D. Dismissal of a formal complaint or a portion thereof does not preclude the school from addressing the underlying conduct in any manner that the school deems appropriate.

X. INVESTIGATION OF A FORMAL COMPLAINT

A. If a formal complaint is received by the school, the school will assign or designate an Investigator to investigate the allegations set forth in the formal complaint.

B. If during the course of the investigation the school decides to investigate any allegations about the complainant or respondent that were not included in the written notice of a formal complaint provided to the parties, the school must provide notice of the additional allegations to the known parties.

C. When a party's participation is invited or expected in an investigative interview, the investigator will coordinate with the Title IX Coordinator to provide written notice to the party of the date, time, location, participants, and purposes of the investigative interview with sufficient time for the party to prepare.

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D. During the investigation, the investigator must provide the parties with an equal opportunity to present witnesses for interviews, including fact witnesses and expert witnesses, and other inculpatory and exculpatory evidence.

E. Prior to the completion of the investigative report, the investigator, through the Title IX Coordinator, will provide the parties and their advisors (if any) with an equal opportunity to inspect and review any evidence directly related to the allegations. The evidence shall be provided in electronic format or hard copy and shall include all relevant evidence, evidence upon which the school does not intend to rely in reaching a determination regarding responsibility, and any inculpatory or exculpatory evidence whether obtained from a party or another source. The parties will have ten (10) days to submit a written response, which the investigator will consider prior to completion of the investigative report.

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F. The Investigator will prepare a written investigative report that fairly summarizes the relevant evidence. The investigative report may include credibility determinations that are not based on a person's status as a complainant, respondent or witness. The school will send the parties and their advisors (if any) a copy of the report in electronic format or hard copy, for their review and written response at least ten (10) days prior to a determination of responsibility.

G. Rooted School does not require or provide for a live hearing as part of its Title IX grievance process for K-12 students.

H. Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant and will not be permitted, unless offered to prove that someone other than the respondent committed the alleged conduct, or if they concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent.

XI. DETERMINATION REGARDING RESPONSIBILITY

A. After the school has sent the investigative report to both parties and before the school has reached a determination regarding responsibility, the decision-maker must afford each party the opportunity to submit written, relevant questions that a party wants asked of any party or witness.

B. The decision-maker must provide the relevant questions submitted by the parties to the other parties or witnesses to whom the questions are offered, and then provide each party with the answers, and allow for additional, limited follow-up questions from each party.

C. The decision-maker must explain to the party proposing the questions any decision to exclude a question as not relevant.

D. When the exchange of questions and answers has concluded, the decision-maker must issue a written determination regarding responsibility that applies the preponderance of the evidence standard to the facts and circumstances of the formal complaint. The written determination of responsibility must include the following:

1. Identification of the allegations potentially constituting sexual harassment;
2. A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, and methods used to gather other evidence;
3. Findings of fact supporting the determination;
4. Conclusions regarding the application of the school's code of conduct to the facts;

5. A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions the school imposes on the respondent, and whether remedies designed to restore or preserve equal access to the recipient's education program or activity will be provided by the school to the complainant; and

6. The school's procedures and permissible bases for the complainant and respondent to appeal and the date by which an appeal must be made.

E. In determining appropriate disciplinary sanctions, the decision-maker should consider the surrounding circumstances, the nature of the behavior, past incidents or past or continuing patterns of behavior, the relationships between the parties involved, and the context in which the alleged incident occurred.

F. The written determination of responsibility must be provided to the parties simultaneously.

G. The Title IX Coordinator responsible for the effective implementation of any remedies.

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H. The determination regarding responsibility becomes final either on the date that the school provides the parties with the written determination of the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

XII. APPEALS

A. The school shall offer the parties an opportunity to appeal a determination regarding responsibility or the school's dismissal of a formal complaint or any allegations therein, on the following bases:

1. A procedural irregularity that affected the outcome of the matter (e.g., a material deviation from established procedures);
2. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and
3. The Title IX Coordinator [i.e. Executive director/Principal], investigator, or decision-maker had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

B. If notice of an appeal is timely received by the school, the school will notify the parties in writing of the receipt of the appeal, assign or designate the appellate decision-maker, and give the parties a reasonable, equal opportunity to submit a written statement in support of, or challenging, the outcome.

C. After reviewing the parties' written statements, the appellate decision-maker must issue a written decision describing the result of the appeal and the rationale for the result.

D. The written decision describing the result of the appeal must be provided simultaneously to the parties.

E. The decision of the appellate decision-maker is final. No further review beyond the appeal is permitted.

XIII. RETALIATION PROHIBITED

A. Neither the school nor any other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX, its implementing regulations, or this policy, or because the individual made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this policy. Intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of

sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX, its implementing regulations, or this policy, constitutes retaliation. Retaliation against a person for making a report of sexual harassment, filing a formal complaint, or participating in an investigation, constitutes a violation of this policy that can result in the imposition of disciplinary sanctions/consequences and/or other appropriate remedies.

B. Any person may submit a report or formal complaint alleging retaliation in the manner described in this policy and it will be addressed in the same manner as other complaints of sexual harassment or sex discrimination.

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

XIV. RECORD KEEPING

Rooted School will maintain for a period of at least seven (7) years records of the following:

- A. Each report of conduct that may constitute sex discrimination under Title IX, including sexual harassment, as defined in 34 C.F.R. § 106.2, and the school's response;
- B. Each grievance process conducted under this policy, including any determination regarding responsibility, any disciplinary sanctions imposed on the respondent, and any remedies provided to the complainant designed to restore or preserve equal access to the school's education program or activity;
- C. Any appeal and the result therefrom;
- D. Any informal resolution and the result therefrom;
- E. All materials used to train Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process. These materials will be made publicly available on the school's website, or, if the school does not maintain a website, will be made available upon request for inspection by members of the public.

All records will be maintained in a manner consistent with the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, and its implementing regulations.

XV. TRAINING Rooted School will ensure that all employees and Title IX personnel receive training as required by federal law.

- A. All Employees will be trained on:
 - a. The school's obligation to address sex discrimination in its education program or activity;
 - b. The scope of conduct that constitutes sex discrimination under Title IX and its regulations, including the definition of sex-based harassment;
 - c. All applicable notification and information requirements under 34 C.F.R. §§ 106.40(b)(2) and 106.44.
- B. Investigators, Decisionmakers, and Other Grievance Personnel
 - a. In addition to the above, all investigators, decisionmakers, and other persons responsible for implementing the school's grievance procedures or who have the authority to modify or terminate supportive measures will be trained on:
 - b. The school's obligations under 34 C.F.R. § 106.44;
 - c. The school's grievance procedures under 34 C.F.R. § 106.45 (and, if applicable, § 106.46);
 - d. How to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias;

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- e. The meaning and application of the term “relevant” in relation to questions and evidence, and the types of evidence that are impermissible regardless of relevance under 34 C.F.R. § 106.45 (and, if applicable, § 106.46).

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C. Facilitators of Informal Resolution. All facilitators of an informal resolution process will be trained on:

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- a. The rules and practices associated with the school’s informal resolution process;
- b. How to serve impartially, including by avoiding conflicts of interest and bias.

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D. Title IX Coordinator and Designees. The Title IX Coordinator and any designees will also be trained on:

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- a. Their specific responsibilities under 34 C.F.R. § 106.8(a);
- b. 34 C.F.R. §§ 106.40(b)(3), 106.44(f) and (g);
- c. The school’s recordkeeping system and the requirements of 34 C.F.R. § 106.8(f);
- d. Any other training necessary to coordinate the school’s compliance with Title IX.

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E. Frequency and Content of Training

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- a. Training will be provided promptly upon hiring or change of position that alters Title IX duties, and annually thereafter.
- b. All training must not rely on sex stereotypes.

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F. Availability of Training Materials

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- a. Rooted School will make all materials used to provide Title IX training available for inspection by members of the public upon request. Requests to inspect training materials may be submitted to the Title IX Coordinator. The school will respond to such requests in a timely manner and will not require a Freedom of Information Act (FOIA) request or other formal process for access.

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XVI. ACCESSIBILITY.

Rooted School is committed to ensuring that all members of its community have meaningful access to its Title IX policy, procedures, and related materials.

Upon request, the school will provide its Title IX policy, procedures, notices, and training materials in accessible formats for individuals with disabilities, such as large print, Braille, audio, or accessible electronic formats, in accordance with Section 504 of the Rehabilitation Act and the Americans with Disabilities Act.

Upon request, the school will provide translations of its Title IX policy, procedures, notices, and training materials, or otherwise ensure meaningful access for individuals with limited English proficiency, in accordance with Title VI of the Civil Rights Act of 1964.

Requests for accessible formats or language assistance may be made to the Title IX Coordinator.

XVII. Pregnant and Parenting Students

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Rooted School does not discriminate against any student on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery from any of these conditions. The school will treat pregnancy and related conditions as it treats any other temporary disability with respect to any medical or hospital benefit, service, plan, or policy for students.

Pregnant and parenting students are entitled to reasonable adjustments and accommodations, such as a larger desk, elevator access, or breaks during class, as needed.

The school will provide leave for pregnancy, childbirth, and related conditions for as long as is deemed medically necessary by the student’s physician. Upon return, students will be reinstated to the same academic and extracurricular status as before the leave began.

The school will not require a doctor’s note for absences related to pregnancy or related conditions unless such documentation is required for all students with physical or emotional conditions requiring treatment by a doctor.

Pregnant and parenting students will have equal access to all educational programs and activities, including extracurricular activities, honors programs, and leadership opportunities.

Students seeking accommodations or support related to pregnancy or parenting may contact the Title IX Coordinator for assistance.

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Legal References:

20 U.S.C. §§ 1681-1688 (Title IX of the Education Amendments)

34 C.F.R. Part 106 (Implementing Regulations of Title IX)

20 U.S.C. § 1400, *et seq.* (Individuals with Disabilities Education Act)

29 U.S.C. § 794 (Section 504 of the Rehabilitation Act)

42 U.S.C. § 12101, *et seq.* (Americans with Disabilities Act)

20 U.S.C. § 1232g (Family Educational Rights and Privacy Act of 1974)

20 U.S.C. § 1092 *et seq.* (Jeanne Clery Disclosure of Campus Security and Campus Crime Statistics Act (“Clery Act”))

Coversheet

First Reading Draft Policy - Communicable Diseases Policy

Section:	II. PUBLIC MEETING PORTION: 2024 - 2025 Budget Amendment & 2025 - 2026 FY Budget Forecast/Approval
Item:	F. First Reading Draft Policy - Communicable Diseases Policy
Purpose:	Discuss
Submitted by:	
Related Material:	DRAFT Rooted School Communicable Disease Policy.pdf

Rooted School: Communicable Disease Policy 2025 - 2026

First Reading – June 20, 2025

Policy Statement:

The safety and well-being of all members of the school community, including students, staff, and visitors, is of paramount importance. Rooted School is committed to providing a safe, healthy environment where all students can learn without fear of harm.

This policy outlines the expectations, procedures, and responsibilities of staff when responding to students who exhibit symptoms of communicable disease.

Exclusion Measures:

Mandatory exclusion of students and/or staff who are diagnosed with certain communicable diseases or conditions from school/work until they are no longer contagious, is the Policy of Rooted School New Orleans.

All diagnoses must be confirmed by a physician or RNP. If confirmation of a diagnosis cannot be readily available, the school nurse may initiate exclusion based on non-diagnostic, but readily identifiable signs or symptoms.

The National Association of School Nurses Communicable Disease Guidance Document and the CDC guidance details both symptom based and disease specific exclusion guidelines. The following exclusion criteria and actions extracted from the Guidance Document and CDC guidance details symptom-based exclusion:

- Fever or temperature of 100.6 Degrees F (38.1C) or greater
- New cough or illness or difficulty breathing
- Headache with stiff neck or with fever
- Chills and sweats
- Unexplained joint and muscle aches
- Diarrhea: 3 loose or watery stools in a day or incontinence of bowels
- Vomiting: One or more episodes that are unexplained
- Skin rash or open sores: with or without drainage
- Red eyes with eye discharge: yellow or brown drainage from the eyes
- Jaundice: New Yellow color in eyes or skin
- Swollen neck or cervical lymph nodes
- Acting differently without a reason: unusually sleepy, grumpy, or confused

- Major health event like an illness lasting 2 or more weeks or a hospital stay or health condition that requires more care than the school staff can safely provide.

Mandatory Isolation Space Requirements:

This is a prevention-oriented health services program that includes a dedicated space to isolate sick students and to provide services for

- All students who become ill at school will remain at school, supervised by staff until parents can pick them up from the designated isolation area.
 - Students must wear a face covering.
 - Staff must wear facial covering and maintain distance but never leave the student.
- While exercising caution to maintain safety is appropriate when working with children exhibiting signs and symptoms, it is also critical that staff maintain sufficient composure so as not to unduly alarm the student or family.
- Staff will maintain student confidentiality as appropriate.
- Space used for isolation must be cleaned regularly before and after each use.

Staff and students displaying **COMMUNICABLE DISEASE** signs or symptoms, per the Guidance Document and CDC guidance, should be tested for **COMMUNICABLE DISEASES**, and may return only with a physician or RNP return to school/work permission form, and must be fever-free for a period of 24 consecutive hours.

Coversheet

First Reading Draft Policy - Employee & Board Communications Policy

Section:	II. PUBLIC MEETING PORTION: 2024 - 2025 Budget Amendment & 2025 - 2026 FY Budget Forecast/Approval
Item:	G. First Reading Draft Policy - Employee & Board Communications Policy
Purpose:	Discuss
Submitted by:	
Related Material:	DRAFT Rooted School Employee & Board Communications Policy.pdf

Rooted School: Employee & Board Communication Policy 2025 - 2026

First Reading – June 20, 2025

Policy Statement:

Open communication and transparency are hallmarks of the Rooted School model. Rooted School is committed to providing a professional, collegial atmosphere for all employees and members of its Board of Directors. To ensure an orderly and effective management and negotiation process, the following policy applies to all employees regarding communications with the School's Board of Directors.

This policy outlines the expectations, procedures, and responsibilities of all faculty/staff and board members when responding to any request for communication in person, via email, or phone. For the purpose of this policy, “communication” shall also include any request for meetings with board/teachers either individually or as a group.

Chain of Command:

Employees are required to address concerns, questions, or suggestions related to workplace issues—including those about wages, working conditions, or union matters (pending ratification of a CBA) through their immediate supervisor, the designated administrator, or the official negotiation team (pending ratification of a CBA).

Prohibition on Individual Meetings:

Employees are not permitted to meet individually with members of the Board of Directors to discuss any work-related or union-related matters. Board members will be instructed to refer all such requests to management or to the negotiation team.

Collective Communication at Board Meetings:

Employees who wish to raise collective concerns, including views or proposals related to union matters, may do so during the appropriate public comment period of scheduled Board meetings, and according to Board procedures as outlined in the meeting agendas. Such communications must be made publicly and not in a private or one-on-one setting with Board members.

Non-Retaliation:

No employee will be subjected to retaliation or discipline for exercising their right to communicate collectively with the Board during authorized and appropriate times as described above.

Equal Application:

This policy applies to all employees and all workplace matters to ensure fairness and consistency.

Coversheet

2nd Reading Revised Policy - Rooted School Policy on Interactions with Law Enforcement and Immigration Authorities

Section: II. PUBLIC MEETING PORTION: 2024 - 2025 Budget Amendment & 2025 - 2026 FY Budget Forecast/Approval
Item: H. 2nd Reading Revised Policy - Rooted School Policy on Interactions with Law Enforcement and Immigration Authorities
Purpose: Vote
Submitted by:
Related Material: REVISED - School Policy on Interactions with Law Enforcement and Immigration Authorities.pdf

Rooted School

WHAT TO DO IF ICE ARRIVES AT OUR SCHOOL

SCHOOL LEGAL ADVISORY:

Immigration Enforcement and Student Rights - 2025

This week, the Department of Homeland Security (DHS) rescinded the policy that designated schools as “sensitive locations,” meaning that Immigration and Customs Enforcement (ICE) officers are no longer restricted from conducting enforcement actions on school grounds and other sensitive areas. With this policy now revoked, enforcement actions may increase in or around school campuses.

SCHOOLS HAVE A LEGAL DUTY TO EDUCATE ALL STUDENTS

Despite this policy change, *Plyler v. Doe* (1982) remains binding law. This Supreme Court ruling ensures that all children, regardless of immigration status, have the right to a free K-12 public education. Schools cannot deny enrollment based on immigration status and must not create policies that discourage undocumented students from attending.

PROTECTING STUDENT DATA UNDER FERPA

The Family Educational Rights and Privacy Act (FERPA) continues to protect student records, including any information that could indicate immigration status. Schools cannot share student records with ICE or law enforcement without parental consent or a judicial subpoena. With ICE now able to operate more freely around schools, districts must be especially vigilant in protecting student information and ensuring compliance with FERPA. Violations of FERPA can lead to loss of federal funding, lawsuits, and liability for districts and employees.

IF ICE ARRIVES AT YOUR SCHOOL

ICE does not have automatic access to schools. Whether school officials must comply depends on the type of warrant ICE presents. If ICE presents an **administrative** warrant, you do not have to turn over students or information. If law enforcement presents a **judicial** warrant, you should contact counsel to confirm the scope of the warrant before turning over students or information:

Warrant	ICE Warrant (linked example)	Judicial Warrant (linked example)
Issuer	ICE officer (administrative)	Judge/magistrate (judicial)
Legal Basis	Immigration law violations	Fourth Amendment, probable cause
Scope	Immigration-related enforcement	Criminal or civil enforcement
Authority to Enter Private Spaces	No (without consent)	Yes (with legal justification)
Consequences of Non-Compliance	None if access is denied	Legal consequences for obstruction

If ICE officers arrive on school grounds, staff should follow these steps:

- Do not allow ICE inside without reviewing the warrant.
- Direct ICE officers to a designated area (e.g., the front office) and notify legal counsel immediately.
- Do not provide student records unless required by a court order signed by a judge.
- Contact parents and inform them of the situation.
- Ensure staff is trained to recognize warrants and refer ICE officers to the designated district official.

ICE AT SCHOOL EVENTS & OFF-CAMPUS LOCATIONS

Because the sensitive locations policy is no longer in place, ICE may attempt enforcement actions at school-sponsored events:

- ICE may attend public school events (e.g., sports, theater) but should not disrupt educational activities.
- School-operated facilities (bus yards, administrative offices, fields, etc.) are no longer protected. Schools should implement policies restricting ICE access to non-public areas.
- Students traveling to and from school may be vulnerable. Schools should consider policies that support student safety outside of school grounds.

HOW TO DOCUMENT & REPORT ICE ACTIVITY

If ICE officers appear at a school or school event, staff should:

- Record the time, location, and names of ICE officers.
- Take photos or notes on what is happening (without obstructing enforcement).
- Notify district legal counsel and leadership immediately.

WHAT SCHOOLS MUST DO NOW

With the rescission of ICE’s sensitive locations policy, schools must be prepared for a significant increase in immigration enforcement activity. Schools should act now to:

- ⇒ **Train all staff** on handling ICE visits and protecting student privacy.
- ⇒ **Draft a district-wide policy** on ICE enforcement, documentation and student data protection. ([See example](#))
- ⇒ **Ensure families understand their rights** by distributing Know-Your-Rights materials.
- ⇒ **Consult legal counsel immediately** if ICE arrives at a school or requests student information.



Rooted School Policy on Interactions with Law Enforcement and Immigration Authorities (ICE)

I. Purpose

This policy establishes clear guidelines for interactions between school personnel and law enforcement agencies, including Immigration and Customs Enforcement (ICE). The purpose is to protect the rights, privacy, and well-being of all students while ensuring compliance with federal and state laws.

II. Scope

This policy applies to all school personnel, including administrators, teachers, staff, and any individuals acting on behalf of the school, in all interactions with law enforcement agencies, including local police, state authorities, federal agencies (such as the FBI and ICE), and school resource officers.

III. General Principles

- Under *Plyler v. Doe* (1982), all children, regardless of immigration status, have the right to a free K-12 public education.¹
- Schools should ensure that no student is deterred from accessing education due to concerns about law enforcement actions.
- School personnel shall not take any action that could expose students to immigration enforcement, except when required by law.
- All interactions with law enforcement agencies must comply with federal and state laws, including the Family Educational Rights and Privacy Act (FERPA) and applicable student privacy laws.

IV. Definitions

- Law Enforcement Agents: Officers from local police departments, state law enforcement agencies, federal agencies (such as ICE, FBI, or DHS), and school resource officers.
- Personally Identifiable Information (PII): Information that can be used to identify an individual, including name, address, Social Security number, and other sensitive data.
- Education Records: Student records maintained by the school or a third party acting on behalf of the school, protected under FERPA.
- Disclosure: The release, transfer, or access to information outside the entity holding it.
- Protected Areas: School grounds, school facilities, bus depots, pick-up/drop-off areas, and school-related events where immigration enforcement should not occur.

V. Law Enforcement Access to Student Information

1. Requests for Student Records

¹ *Plyler v. Doe*, 457 U.S. 202, 102 S. Ct. 2382, 72 L. Ed. 2d 786 (1982) (holding that states may not deny free public education to undocumented children under the Equal Protection Clause, and that policies discouraging enrollment—such as requiring or sharing immigration status—may undermine this constitutional right).

- Schools shall not disclose student education records or personally identifiable information (PII) unless:
 - A valid subpoena, warrant, or court order is presented.²
 - The request falls under FERPA's emergency disclosure exception.
- If law enforcement requests student records:
 - The principal/designee must verify the agent's identity and retain a copy of their credentials.
 - If presented with a valid judicial warrant, records must be provided immediately, and parents must be notified as soon as possible.
 - If presented with a subpoena or court order, reasonable efforts must be made to notify parents before disclosure.
 - If no legal order is presented, legal counsel must be consulted before any information is provided.³

2. *Emergency Disclosures*

- School administrators may disclose limited PII without consent if there is an imminent health or safety emergency.
- Any such disclosures must be documented, including:
 - The specific threat that justified the disclosure.
 - The information shared and the recipient.

VI. **Interrogations and Arrests on School Grounds**

Absent exigent circumstances (e.g., preventing harm to a student, preventing destruction of evidence of a serious crime, or preventing flight from the area by a student suspected of serious criminal activity), interviews of students by law enforcement authorities about matters unrelated to school shall be conducted away from school and after school hours. If a law enforcement agent requests to interview a student at school about a non-school related matter, the procedures outlined below shall nonetheless be followed.

1. *Interrogations by Law Enforcement*

- If law enforcement requests to interview a student regarding a school-related incident:
 - The principal/designee must be notified.
 - A valid subpoena, warrant, or court order must be presented.
 - Every effort must be made to notify the student's parent or guardian before the interview, unless extenuating circumstances exist (e.g., risk of harm, destruction of evidence).
 - If a parent/guardian wishes to be present, the interview should be delayed if feasible.

² See 34 C.F.R. § 99.31(a)(9)(FERPA exception for compliance with subpoena or court order).

³ US Constitution, Amend. IV; US Constitution, Amend. XIV, Sec. 1; 20 USC 1232 (g-i) (Family Educational Rights and Privacy Act); 34 CFR 99.1-99.67 (Family Educational Rights and Privacy - Federal Regulations); La. Rev. Stat. Ann. §§17:416, 17:416.3, 17:3913, 17:3914; *New Jersey v. T.L.O.*, 469 U.S. 325, 105 S. Ct. 733.

- A school official must be present during the interview if a parent is not available.
- Students have the right to refuse to speak with law enforcement.
- If law enforcement seeks to interview a student about a non-school-related incident, the interview should occur off school premises and after school hours, unless exigent circumstances exist.

2. *Arrests on School Grounds*

- Schools must cooperate with law enforcement but should minimize disruption to students.
- A student may only be released to law enforcement officers upon presentation of a valid judicial warrant, attachment, or subpoena.
- If a student is arrested:
 - Staff must attempt to notify the parent/legal guardian immediately.
 - The incident should be documented in school records.

VII. Interactions with Immigration and Customs Enforcement (ICE)

1. *Protected School Spaces*

The school considers school property, facilities, and related areas including parking lots, bus depots and pick-up and drop-off areas as protected areas for the purposes of immigration law enforcement. Therefore, it is the school's policy that the school premises, including adjacent areas used for school-related activities, and school-related events are considered protected spaces at which immigration enforcement actions should not occur.

The school defines protected areas as the school, all of the property owned by the school, including facilities owned, controlled, or leased by the school, official activities of the school, including those occurring in public places and adjacent areas.

This designation shall apply regardless of whether federal agency policy is modified or rescinded.

Accordingly, ICE agents are not permitted on school grounds without a valid judicial warrant. Administrative ICE warrants (not signed by a judge) do not grant ICE access to students, school facilities, or school records.

2. *ICE Requests for Information*

- School personnel shall not voluntarily share any information about students' immigration status.
- If ICE agents request student records:
 - The principal/designee must contact legal counsel immediately before providing any information.
 - Parents/guardians must be notified, unless legally prohibited.
 - Only a judicial warrant (not an administrative ICE warrant) may authorize the release of student records.

3. *ICE Presence on School Grounds*

Immigration and Customs Enforcement officers, or state and local law enforcement acting on behalf of Immigration and Customs Enforcement or any other federal agency under the purview of the Department of Homeland Security or the Department of State, must adhere to the following protocols before entering school grounds:

- Law enforcement must present a valid, judicially authorized warrant or subpoena.
- The principal/designee must deny access until legal counsel is consulted.
- A school administrator must accompany ICE agents at all times if access is granted.
- Parents/guardians must be notified as soon as possible.

4. *ICE Requests for Persons*

Should immigration law enforcement agents attempt to detain, apprehend, interview, search, arrest a student or any person or to otherwise enforce immigration laws on school grounds, (e.g., detention or apprehension, arrest, interview, or searches of individuals), the school principal/designee shall:

- Comply with the procedures set forth in “Interrogations by Law Enforcement” above.
- Immediately contact network legal counsel for guidance prior to allowing any access to the school site or to any student or student information.
 - If ICE agents present a warrant, it's crucial to verify that it is a judicial warrant signed by a judge (*see [example](#)*), not an administrative warrant issued by ICE (*see [example](#)*).
 - An ICE warrant does not grant an immigration officer access to non-public areas of school grounds, nor does it allow ICE agents to search school records.
 - Schools are not required to assist with or consent to U.S. Immigration and Customs Enforcement (ICE) agents’ access to students or facilities if the agents present only an administrative warrant.
 - Administrative warrants, issued by ICE officials, do not carry the same authority as judicial warrants signed by a judge or magistrate.
- Provide the agents with a copy of this policy and advise them that you are required to comply with this policy prior to allowing them access to the school site or to any student or student information.
- Make every reasonable effort to notify the parent/legal guardian or parental designee.

VIII. **Training and Compliance**

All school staff will receive annual training on this policy and their legal responsibilities regarding interactions with law enforcement and ICE. Training will include:

- How to respond to law enforcement requests.
- Identifying the difference between a judicial warrant and an administrative ICE warrant.
- The importance of student privacy.

School leaders will ensure that all policies are consistently followed and report any violations to legal counsel.

IX. Reporting and Documentation

Any interactions with law enforcement or ICE agents must be documented. Documentation shall include:

- The date, time, and location of the incident.
- The name, agency, and badge number of the officer(s) involved.
- The nature of the request (e.g., request for records, student interview, or arrest).
- Persons present.
- Actions taken by school personnel.
- Any notifications made to parents/guardians.

X. Conclusion

This policy ensures that interactions with law enforcement, including ICE, are handled with transparency, legal oversight, and respect for student privacy. Schools remain committed to protecting all students and ensuring a safe and inclusive learning environment.

[ADDITIONAL INFORMATION FROM NATIONAL IMMIGRATION LAW CENTER](#)