



The Mission of Promontory School of Expeditionary Learning is to provide a rich educational environment that views learning as an Expedition and uses the study of Great Thinkers to cultivate the value of excellence and the love of knowledge. Using investigation and discovery to make connections to ideas and our community, we empower children to embrace challenge, act with humanity, and become the Great Thinkers of the 21st century.

BOARD OF DIRECTORS MEETING

AGENDA

June 18, 2026

7:00PM

1051 W 2700 S

Perry, UT 84302

Join via zoom at: <https://promontoryschool-org.zoom.us/j/9451212783?pwd=Fot0r90ZSsMm601vo7j7h8KaijG4Ur.1&omn=87821093585>

7:00 PM – **CALL TO ORDER: Becca Ashby**

- Welcome/Mission Statement and Pledge: Stephanie Quintero

7:10PM – **PUBLIC COMMENT**

** PUBLIC PLEASE NOTE: All public input will be taken into consideration, but not be discussed by the board during this meeting. Comments will be limited to three minutes each. We appreciate your input and invite your comments. - Promontory Board of Trustees*

7:15PM—POP Update

7:20 PM –Training: UAPCS conference recap

7:30 PM – **FINANCE REPORT**

- Budget Review – Brian Cates

7:40 PM – **MINUTES**

- 5-21-2026 Meeting Minutes

7:45 PM – **ACTION ITEMS**

- Approve FY2026 Budget
- Approve Preliminary FY2027 Budget

- Ratify Director
- Ratify Board Members & Terms
- Board Meeting Schedule
- Fall 7/8 Overnight Kick-Off
- 7/8 Expedition
- Kindergarten Expedition
- Bullying, Cyberbullying, Hazing, & Retaliation Policy
- Equal Opportunity in Education Policy
- Criminal Background Check Policy
- Employment of Relatives Policy
- Equipment Records and Inventory Procedures
- FERPA Annual Rights Notification
- FERPA Student Directory Policy
- Artificial Intelligence (AI) Policy
- Reporting Fraud, Waste, and Abuse Policy
- Cell Phone Policy

8:15 PM --**BUSINESS ITEMS**

- Emergency Plan/Emergency Response Plan Policy
- **Assigned Policies:**
 - Governing Board Policy -Executive Committee
 - Board Member Screening Policy-Executive Committee
 - Electronic Device Policy-Policy Committee
 - Emergency Response Plan Policy-Safety Committee
 - Metadata Element Definition- Policy Committee
 - Attendance Procedures-Executive Committee
 - Food Sold on School Grounds-Wellness Committee

- Founding Member Policy -Executive Committee

8:40 PM DIRECTOR'S REPORT

- Staffing Update
- Enrollment/Lottery
- Student Achievement
- Professional Development
- Public Relations
- Charter Goal Agreements

8:50 PM CLOSED MEETING

9:00 PM – ADJOURN

*Next scheduled Board Meeting August 20, 2026.

In compliance with the American with Disabilities Act, persons needing auxiliary communicative aids and services for these meetings should contact Tammy Stutznegger at tstutznegger@promontoryschool.org giving at least three working days notice. "This institution is an equal opportunity provider and employer.



PROMONTORY

school of expeditionary learning

BOARD OF DIRECTORS MEETING

May 21, 2026

7:00PM

1051 W 2700 S

Perry, UT 84302

Trustees:

Becca Ashby
Amber Jenks
Hilary Gerhardt
Adrienne Murray
Barbie Molgard-Wright

Officers:

Michelle Wilson
Stephanie Quintero-Zoom

Director:

Amber Edelman
Emily Ross
Janni Richards

Visitors:

Tammy Stutznegger
Julia Harris
Darcy Young
Teresa Lee-Zoom
Glenna Petersen-Zoom
Diane-Zoom
J Dunlop-Zoom

7:05 PM – **CALL TO ORDER: Becca Ashby**

· Welcome/Mission Statement and Pledge: Stephanie Nielsen

7:10PM – **PUBLIC COMMENT–No public comment**

7:11PM—**POP Update**—Fundraiser. Had a movie night with concessions, yard sale/bake sale. Continued our bake sale and then had our silent auction. Haven't finished up figuring out the expenses. Around \$1,000 earned in concessions/yard sale/bake sale. Silent auction came in about \$4,122 and \$4,700 in business donations. The total will be close to about \$10,000. Notable cash donations from Fox Pest Control, Grizzly Center Youth Foundation, Blanchard's Braces, and Peach City. Had student body alumni there to help out. Shout out to Sharla Hunsaker, Marcie Mitchell, Aimee Heiner, Karen Braithwaite, Amber Jenks.

7:15 PM –**Training:** FERPA Training Video.

8:35 PM – **FINANCE REPORT**

· **Budget Review** – Brian Cates – Getting this year dialed in. We are in as good a spot as

we could have been. Preparing for next year. PTIF as of the end of April. Still hover over the 4% mark on the daily rate. I had to make a couple of transfers. Made another one a couple of days ago ahead of the 5/20 payroll. The cash balance is still strong. Expect to transfer funds back. Budget summary is 83% of fiscal year. Enrollment is at 399 as of the end of April. Looking better for next year. \$127,000 net income. 2% operating margin. Still a work in progress on the revenue and expense side. Next month we will approve the budgets.

7:31 PM – **MINUTES**

- 4-16-2026 Board Meeting Minute – Hilary motions to approve. Adrienne seconds. Motion is carried.
- 4-21-2026 Board Retreat Minutes – Amber Jenks motions to approve with the changes discussed. Barbie seconds. Motion is carried.

7:35 PM – **ACTION ITEMS**

- **Fall 7th Overnight Kick-Off** –Table. Stephanie Nielsen motions to table. Hilary seconds. Motion is tabled.

- **Fundraiser Request**-Darcy-Wants to do a fundraiser to earn funds to help purchase food for concessions for the movie nights. Hopes to earn \$4,700 profit. The goal is to raise money for community events. Consider the need for food handlers permits. Lowest scores came to the board.

Amber Jenks motions to approve. Barbie seconds. Motion is carried.

7:45 PM --**BUSINESS ITEMS**

- **Admin Survey Results**–Barbie commented on how we are being very transparent. As a board we needed to evaluate the system, not an individual. Received results from both staff and families. We had 118 families and 48 staff. Mostly anonymous. The strongest area identified was the school culture. Effectiveness of the administration team structure. The survey suggested that the staff feels more supported. There can be confusion between board responsibilities and the administration responsibilities. The purpose of the survey is to seek continuous improvement. Amber Jenks mentioned that it feels like a more transparent survey.

- **Electronic Device Policy**--Legislators passed a law to ban electronics in school. Cell phone bill. Bell to bell. Discuss what that looks like. Even in the strictest outcome, an emergency situation would be a reason for a student to have their phone. Read the law and do the research and revisit it next month.

The second part is on how we use electronics in the classroom. K-3 not able to use 1 to 1 devices. Older kids would be for intentional use. Allowing parents to see what they have been on and for how long.

- **Background Check Policy**– Amber Edelman is requesting a policy so we have clear guidelines. Currently we do not have any clarity. What is permissible with their own student vs other students. Amber Edelman suggests having the safety committee dig into this.

· **Assigned Policies:**

- Board Member Screening Policy-Executive
- Governing Board Policy-Executive
- AI Guidelines Policy-Policy
- FERPA Annual Rights Notice-Policy
- FERPA Use of Student Directory Information-Policy

- Electronic Device Policy-Policy
- Background Check Policy-Hiring
- Employment of Relatives Policy-Hiring
- Equipment Records/Inventory Policy & Procedure-Facilities/Special Projects
- Reporting Fraud, Abuse, & Waste Policy-Finance
- Emergency Response Plan Policy-Safety Committee

8:40 PM **DIRECTOR'S REPORT**

Staffing:

Staff will be working on End of Year Checklists to help ensure a smooth, organized transition into summer break. Administration is finalizing contracts for the upcoming school year. All teachers and full time staff have been met with.

Enrollment/Lottery:

Next year's enrollment is 433.

Student Achievement:

RISE Highlights

- Math increased +1% overall, which helped us meet our School Improvement goal for Year 1.

We grew +9% from mid-year math to end-of-year math

- We had significant growth in Science this year, with an overall +5% growth from last year.
- We have an intentional plan for ELA for next school year.

We grew +3% from mid-year ELA to end-of-year ELA

- We had increased participation in the RISE test this year from the past two years.

Professional Development

Teachers reviewed Core Practices and identified priorities for next year.

Summer PD:

Teachers have been asked to attend the Utah Learns Conference at Edith Bowen in June, or to have an alternative PD approved by Admin

UAPCS Conference in June

Expeditionary Learning Conference in July

SPED Law Conference in July

Staff Feedback Surveys - April 24th

How would you rate your PD experience:

Average of 4.75 / 5

How are we doing in providing the support

you need: Average of 4.67 / 5

8:50 PM CLOSED MEETING--NONE

9:14 PM – **ADJOURN**--Amber Jenks motions to adjourn. Hilary seconds. Motion is carried.

*Next scheduled Board Meeting June 18, 2026

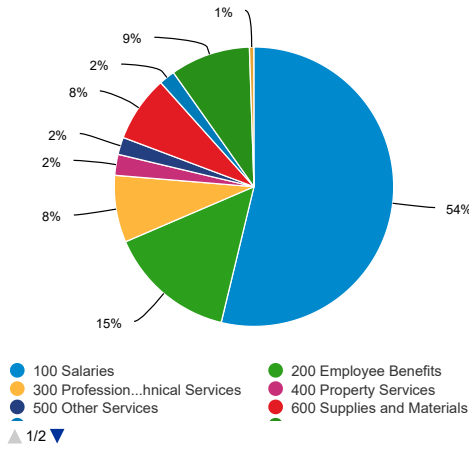
Financial Summary

Category	YTD Amount	Total Budget	Total Forecast	% Target	% Forecast
Revenue (3 School Category records)					
1000 Local Revenue	\$182,724	\$189,000	\$191,955	48.9%	95.2%
3000 State Revenue	\$4,828,796	\$5,721,545	\$5,575,831	86.7%	86.6%
4000 Federal Revenue	\$152,970	\$390,718	\$401,045	13.9%	38.1%
TOT	\$5,164,489	\$6,301,263	\$6,168,831		
Expense (9 School Category records)					
100 Salaries	-\$3,047,025	-\$3,147,500	-\$3,327,025	85.0%	91.6%
200 Employee Benefits	-\$859,226	-\$958,300	-\$914,267	89.6%	94.0%
300 Professional and Technical Services	-\$466,938	-\$464,300	-\$479,884	15.7%	97.3%
400 Property Services	-\$114,522	-\$175,000	-\$150,000	-0.0%	76.3%
500 Other Services	-\$83,675	-\$104,500	-\$123,695	-0.0%	67.6%
600 Supplies and Materials	-\$432,388	-\$465,100	-\$472,358	-0.0%	91.5%
700 Property	-\$114,108	-\$65,000	-\$114,107	-0.0%	100.0%
800 Debt Service and Misc	-\$407,898	-\$566,289	-\$573,503	-0.0%	71.1%
900 CapEx & Extra Ordinary	-\$31,772	-\$310,000	-\$31,772	-0.0%	100.0%
TOT	-\$5,557,551	-\$6,255,989	-\$6,186,611		
TOT	-\$393,062	\$45,274	-\$17,780		

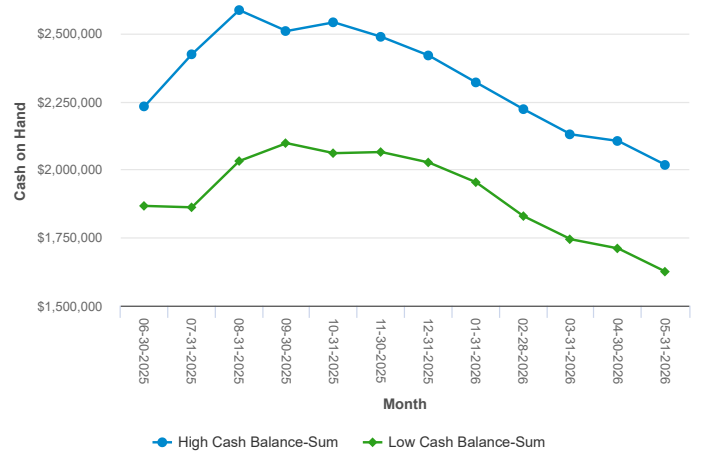
Financial Metrics

Financial Metric	Covenant	Target	Forecast
Operating Margin		4.0	0.23
Debt Service Ratio	1.15	1.30	1.03
% Building		<16	9
Unrestricted Days Cash	40	100	132

Expense Distribution



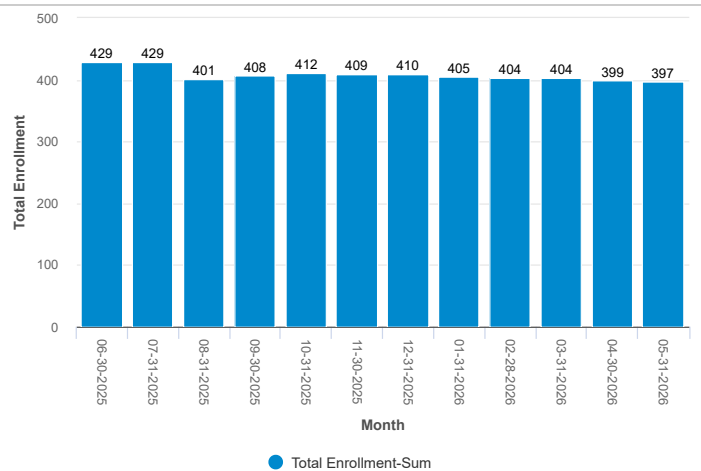
Cash Balance



Revenue vs Expenses



Enrollment Trend



Finance Manager : School Budget | Next Yr Budget

Next Yr Budget

Budget Name	Prior Yr Budget	YTD Amount	Current Yr Budget	Forecast	% Target	% of Forecast	Next Yr Budget	\$ Change	% Change
Promontory School of Expeditionary Learning - Revenue - 1000 Local Revenue (12 School Budget records)									
1510 Interest on Investments	\$5,000	\$93,407	\$110,000	\$102,000	92.0%	91.6%	\$90,000	-12,000	-12%
1610 Lunch Program	\$7,000	\$60,175	\$56,000	\$60,175		100.0%	\$56,000	-4,175	-7%
1720 Yearbook Income	\$485	\$1,646	\$0	\$1,646		100.0%	\$0	-1,646	-100%
1720 Bookfair Income	\$1,311	\$1,699	\$0	\$1,699		100.0%	\$0	-1,699	-100%
1720 Uniforms		\$329	\$0	\$329		99.8%	\$0	-329	-100%
1741 Middle School Fees	\$6,000	\$4,448	\$5,000	\$5,000		89.0%	\$5,000	0	0%
1920 Fieldwork/Expedition Donations	\$5,000	\$1,073	\$6,000	\$1,073		100.0%	\$1,000	-73	-7%
1920 Community Donations	\$1,000	\$12,542	\$3,000	\$12,542		100.0%	\$3,000	-9,542	-76%
1923 POP Income	\$2,000		\$3,000	\$0			\$3,000	3,000	
1923 Adventure	\$0		\$0	\$0			\$0	0	
1923 Corporate Donations		\$6,891	\$3,000	\$6,891		100.0%	\$3,000	-3,891	-56%
1990 Miscellaneous/Background Checks/Fines	\$2,000	\$514	\$3,000	\$600		85.6%	\$3,000	2,400	400%
TOT	\$29,796	\$182,724	\$189,000	\$191,955			\$164,000	-27,955	
Promontory School of Expeditionary Learning - Revenue - 3000 State Revenue (36 School Budget records)									
3010 Regular School Prgm K-12	\$1,447,374	\$1,698,411	\$1,826,562	\$1,852,256	92.0%	91.7%	\$1,769,471	-82,785	-4%
3020 Professional Staff	\$105,107		\$0	\$0			\$0	0	
3105 Special Education -- Add-On	\$285,582	\$440,467	\$454,696	\$480,509	92.0%	91.7%	\$544,423	63,914	13%
3110 Special Education -- Self-Contained	\$3,619	\$14,258	\$15,554	\$15,554	92.0%	91.7%	\$20,021	4,467	29%
3120 Special Education -- Extended Year	\$3,583	\$3,722	\$4,061	\$4,061	92.0%	91.7%	\$4,445	384	9%
3125 Special Education -- State Programs	\$6,738	\$8,916	\$9,726	\$9,726	92.0%	91.7%	\$9,590	-136	-1%
3128 Special Education -- Stipends for ESY	\$1,610	\$1,808	\$0	\$1,808	100.0%	100.0%	\$0	-1,808	-100%
3153 Students At-Risk Add-on		\$88,125	\$135,733	\$94,251	92.0%	93.5%	\$112,838	18,587	20%
3211 Gifted and Talented	\$3,531	\$3,609	\$0	\$3,937	92.0%	91.7%	\$3,937	0	0%
3230 Class Size Reduction - K-8	\$153,509	\$174,958	\$191,465	\$190,828	92.0%	91.7%	\$182,876	-7,952	-4%
3410 Flexible Allocation	\$0	\$156,832	\$170,856	\$171,131	92.0%	91.6%	\$169,141	-1,990	-1%
3520 School Land Trust	\$60,475	\$69,051	\$69,051	\$69,051	100.0%	100.0%	\$76,975	7,924	11%
3566 Professional Learning	\$0		\$0	\$0			\$0	0	
3579 Mental Health Grant	\$38,000		\$37,137	\$37,137			\$35,493	-1,644	-4%
3582 Beverly T. Sorenson Elem Arts		\$32,083	\$36,000	\$35,000	92.0%	91.7%	\$35,000	0	0%
3596 School Safety Grant			\$200,000	\$118,811			\$122,000	3,189	3%
3655 Digital Teaching & Learning	\$27,460		\$26,000	\$17,207			\$0	-17,207	-100%
3719 Charter School Local Replacement	\$1,196,543	\$1,362,163	\$1,607,204	\$1,480,224	92.0%	92.0%	\$1,547,544	67,320	5%
3725 Charter School Admin Costs	\$42,997	\$77,917	\$85,000	\$85,000	92.0%	91.7%	\$83,525	-1,475	-2%
3770 School Lunch (Liquor Tax)	\$25,000	\$25,740	\$27,000	\$27,000	92.0%	95.3%	\$27,000	0	0%
3800 TSSA Program	\$78,680	\$131,359	\$143,301	\$143,301	92.0%	91.7%	\$146,425	3,124	2%
3800 Suicide Prevention	\$0	\$1,000	\$1,000	\$1,000	100.0%	100.0%	\$1,000	0	0%
3800 Educator Professional Time	\$0	\$63,275	\$58,193	\$63,275	100.0%	100.0%	\$63,714	439	1%
3800 CSI Grant			\$49,988	\$49,988			\$36,000	-13,988	-28%
3800 Salary Supplement for Highly-Needed Educators		\$17,667	\$19,273	\$19,273	92.0%	91.7%	\$17,242	-2,031	-11%

Budget Name	Prior Yr Budget	YTD Amount	Current Yr Budget	Forecast	% Target	% of Forecast	Next Yr Budget	\$ Change	% Change
3800 School-Based Education Support Professionals Stipends		\$59,670	\$62,493	\$59,670	100.0%	100.0%	\$0	-59,670	-100%
3800 Schools Fees PEESRA		\$3,805	\$0	\$3,805	100.0%	100.0%	\$0	-3,805	-100%
3813 Stipends For Future Educators		\$6,500	\$0	\$6,500	100.0%	100.0%	\$0	-6,500	-100%
3814 Master Pilot Grant			\$40,235	\$40,235			\$0	-40,235	-100%
3818 K-3 Reading Software		\$11,052		\$11,052	100.0%	100.0%	\$0	-11,052	-100%
3846 Innovation Grant			\$0	\$0			\$0	0	
3868 Teacher Materials and Supplies	\$3,292	\$11,254	\$11,935	\$11,254	100.0%	100.0%	\$11,254	0	0%
3870 PCBL Competency Based Learning			\$65,000	\$75,000			\$0	-75,000	-100%
3872 Substance Prevention	\$0	\$4,000	\$4,000	\$4,000	100.0%	100.0%	\$4,000	0	0%
3876 Educator Salary Adjustment	\$104,791	\$361,154	\$370,082	\$393,987	92.0%	91.7%	\$405,806	11,819	3%
3878 Special Education-Extended Year	\$0		\$0	\$0			\$0	0	
TOT	\$3,587,891	\$4,828,796	\$5,721,545	\$5,575,831			\$5,429,720	-146,111	
Promontory School of Expeditionary Learning - Revenue - 4000 Federal Revenue (10 School Budget records)									
4500 SRSA (REAP) Grant		\$55,678	\$50,583	\$55,678	100.0%	100.0%	\$50,583	-5,095	-9%
4522 IDEA Preschool	\$3,326		\$1,951	\$2,008			\$2,008	0	0%
4524 IDEA Part-B	\$94,596		\$83,214	\$86,706			\$86,706	0	0%
4571 National School Lunch Prgm	\$13,000	\$19,683	\$18,000	\$19,683		100.0%	\$18,000	-1,683	-9%
4572 Free & Reduced Reimbursement	\$90,000	\$57,925	\$68,000	\$68,000		85.2%	\$68,000	0	0%
4573 National School Breakfast	\$19,000	\$19,683	\$22,000	\$22,000		89.5%	\$22,000	0	0%
4801 Title IA	\$48,369		\$79,086	\$79,086			\$79,086	0	0%
4860 Title IIA	\$9,474		\$7,884	\$7,884			\$7,884	0	0%
4890 Title IVA	\$10,000		\$10,000	\$10,000			\$10,000	0	0%
4893 Stronger Connections Grant			\$50,000	\$50,000			\$50,000	0	0%
TOT	\$287,765	\$152,970	\$390,718	\$401,045			\$394,267	-6,778	
Promontory School of Expeditionary Learning - Expense - 100 Salaries (15 School Budget records)									
121.24 Administration	-\$152,000	-\$280,545	-\$282,000	-\$300,000	92.0%	93.5%	-\$226,305	73,695	-25%
131.1 Teachers	-\$975,400	-\$1,342,646	-\$1,343,000	-\$1,465,000	92.0%	91.6%	-\$1,413,000	52,000	-4%
131.1 Merit Pay/Winter Bonus	-\$30,000	-\$2,000	-\$43,000	-\$43,000		4.7%	-\$43,000	0	-0%
131.1 Special Education Teachers	-\$111,000	-\$295,974	-\$235,000	-\$330,000	92.0%	89.7%	-\$322,000	8,000	-2%
131.1 Stipends	-\$7,000	-\$118,056	-\$150,000	-\$150,000		78.7%	-\$80,000	70,000	-47%
132.1 Substitute Teachers	-\$18,900	-\$46,083	-\$51,000	-\$46,083		100.0%	-\$40,000	6,083	-13%
132.1 PTO Cash Out	-\$10,962	-\$15,694	-\$10,000	-\$15,694		100.0%	-\$14,000	1,694	-11%
142.21 Counselor	-\$38,000	-\$48,572	-\$56,500	-\$53,000	92.0%	91.6%	-\$58,195	-5,195	10%
152.24 Office Salaries	-\$115,700	-\$155,377	-\$170,000	-\$170,000	92.0%	91.4%	-\$214,500	-44,500	26%
161.1 Community Aides/Literacy Aides	-\$200,970	-\$315,630	-\$316,000	-\$316,000	92.0%	99.9%	-\$269,300	46,700	-15%
161.1 Special Education Aides	-\$75,618	-\$166,843	-\$120,000	-\$166,843	92.0%	100.0%	-\$149,000	17,843	-11%
161.1 RTI / Title I	-\$51,000	-\$42,205	-\$121,000	-\$45,000	92.0%	93.8%	-\$115,000	-70,000	156%
162.22 Library Aide	-\$24,867	-\$40,405	-\$40,000	-\$40,405	92.0%	100.0%	-\$16,400	24,005	-59%
182.26 Custodial/Maintenance Salaries	-\$30,000	-\$62,090	-\$94,000	-\$70,000	92.0%	88.7%	-\$70,000	0	-0%
191.31 Kitchen Salaries	-\$94,867	-\$114,903	-\$116,000	-\$116,000	92.0%	99.1%	-\$111,400	4,600	-4%
TOT	-\$1,936,284	-\$3,047,025	-\$3,147,500	-\$3,327,025			-\$3,142,100	184,925	
Promontory School of Expeditionary Learning - Expense - 200 Employee Benefits (8 School Budget records)									
220 FICA	-\$137,776	-\$224,491	-\$230,000	-\$235,000	92.0%	95.5%	-\$225,000	10,000	-4%
230 Retirement	-\$90,000	-\$115,493	-\$130,000	-\$125,000	92.0%	92.4%	-\$127,000	-2,000	2%
241 Health Insurance	-\$395,000	-\$503,591	-\$545,000	-\$530,000	92.0%	95.0%	-\$555,000	-25,000	5%
242 Life and Disability Insurance	-\$650	\$5,979	-\$5,300	\$0			-\$5,000	-5,000	
243 HRA/Flex Spending	-\$14,400	-\$10,267	-\$17,000	-\$10,267		100.0%	-\$10,000	267	-3%
244 Dental Insurance	-\$22,000	\$1,777	-\$10,000	\$0			-\$1,000	-1,000	

Budget Name	Prior Yr Budget	YTD Amount	Current Yr Budget	Forecast	% Target	% of Forecast	Next Yr Budget	\$ Change	% Change
270 Worker's Compensation Fund	-\$8,500	-\$9,646	-\$16,000	-\$10,000		96.5%	-\$10,000	0	-0%
280 Unemployment Insurance	-\$2,000	-\$3,496	-\$5,000	-\$4,000		87.4%	-\$4,000	0	-0%
TOT	-\$670,326	-\$859,226	-\$958,300	-\$914,267			-\$937,000	-22,733	
Promontory School of Expeditionary Learning - Expense - 300 Professional and Technical Services (9 School Budget records)									
323.21 SpEd Services OT, Psych, other	-\$53,000	-\$176,632	-\$190,000	-\$180,000		98.1%	-\$135,000	45,000	-25%
330.22 Expeditionary Learning Contract	\$0		\$0	\$0			\$0	0	
331.22 Professional Development	-\$4,000	-\$28,875	-\$14,000	-\$28,875		100.0%	-\$15,000	13,875	-48%
345.23 Audit Services	-\$11,200	-\$18,352	-\$18,300	-\$18,352		100.0%	-\$18,300	52	-0%
345.25 Business Services	-\$74,328	-\$75,196	-\$82,000	-\$82,000	92.0%	91.7%	-\$82,000	0	-0%
345.25 Professional Services		-\$2,277	-\$5,000	-\$3,000		75.9%	-\$40,000	-37,000	1233%
347.21 Speech Therapy Services	-\$63,000	-\$92,657	-\$103,000	-\$92,657		100.0%	-\$100,000	-7,343	8%
349.23 Legal Services	-\$10,000	-\$13,274	-\$10,000	-\$15,000		88.5%	-\$10,000	5,000	-33%
350.25 Technical Services (IT)	-\$45,000	-\$59,675	-\$42,000	-\$60,000		99.5%	-\$55,000	5,000	-8%
TOT	-\$260,528	-\$466,938	-\$464,300	-\$479,884			-\$455,300	24,584	
Promontory School of Expeditionary Learning - Expense - 400 Property Services (6 School Budget records)									
412.26 Water / Sewage / Garbage	-\$12,500	-\$11,898	-\$16,000	-\$14,000		85.0%	-\$16,000	-2,000	14%
422.26 Lawn Care & Snow Removal	-\$20,000	-\$3,010	-\$20,000	-\$5,000		60.2%	-\$6,000	-1,000	20%
423.26 Custodial Services	-\$50,000	-\$33,604	-\$52,000	-\$36,000		93.3%	-\$32,000	4,000	-11%
430.26 Repairs / Maintenance / Monitoring	-\$24,000	-\$46,261	-\$35,000	-\$70,000		66.1%	-\$65,000	5,000	-7%
443.25 Lease of Copy Machines	-\$21,000	-\$19,748	-\$22,000	-\$20,000		98.7%	-\$20,000	0	-0%
450.46 Construction Services (West Side)	-\$85,000		-\$30,000	-\$5,000			-\$10,000	-5,000	100%
TOT	-\$212,500	-\$114,522	-\$175,000	-\$150,000			-\$149,000	1,000	
Promontory School of Expeditionary Learning - Expense - 500 Other Services (6 School Budget records)									
518.21 Field Work Travel / Entrance Fees	-\$19,200	-\$5,449	-\$23,000	-\$23,000		23.7%	-\$23,000	0	-0%
518.21 Adventure	-\$6,728	-\$2,161	-\$13,000	-\$13,000		16.6%	-\$13,000	0	-0%
520.23 Liability, Property, D&O Insurance	-\$18,000	-\$26,327	-\$36,000	-\$36,000		73.1%	-\$36,000	0	-0%
530.24 Telephone	-\$6,000	-\$4,559	-\$6,500	-\$6,500		70.1%	-\$6,500	0	-0%
540.23 Marketing	-\$10,000	-\$32,293	-\$20,000	-\$32,308		100.0%	-\$10,000	22,308	-69%
580.22 Travel	-\$12,000	-\$12,887	-\$6,000	-\$12,887		100.0%	-\$5,000	7,887	-61%
TOT	-\$71,928	-\$83,675	-\$104,500	-\$123,695			-\$93,500	30,195	
Promontory School of Expeditionary Learning - Expense - 600 Supplies and Materials (17 School Budget records)									
610.1 Classroom / Expedition	-\$53,000	-\$89,560	-\$95,000	-\$95,000		94.3%	-\$75,000	20,000	-21%
610.1 Adventure Supplies	-\$1,500	-\$8,948	-\$4,500	-\$8,948		100.0%	-\$4,500	4,448	-50%
610.1 Special Education Materials	-\$4,500	-\$2,179	-\$3,800	-\$3,800		57.3%	-\$3,800	0	-0%
610.1 Student Activity Supplies		-\$3,126	-\$1,000	-\$5,000		62.5%	-\$1,000	4,000	-80%
610.22 Professional Development Supplies	-\$2,500	-\$8,728	-\$12,000	-\$10,500		83.1%	-\$8,000	2,500	-24%
610.22 Yearbooks	-\$2,700		-\$3,500	-\$3,500			-\$3,500	0	-0%
610.23 Board Expenses		-\$2,446	-\$2,000	-\$2,446		100.0%	-\$2,000	446	-18%
610.24 Office Supplies	-\$22,000	-\$42,355	-\$33,000	-\$42,355		100.0%	-\$33,000	9,355	-22%
610.33 POP Expenses	-\$2,500	-\$7,509	-\$5,000	-\$7,509		100.0%	-\$5,000	2,509	-33%
622.26 Energy Supplies	-\$37,000	-\$51,485	-\$61,000	-\$56,000		91.9%	-\$57,000	-1,000	2%
630.31 Food and Kitchen	-\$75,000	-\$109,195	-\$118,000	-\$118,000		92.5%	-\$121,000	-3,000	3%
641.1 Textbooks & Curriculum	-\$5,000	-\$30,194	-\$40,000	-\$35,000		86.3%	-\$10,000	25,000	-71%
644.22 Library	-\$7,000	-\$6,410	-\$8,000	-\$7,000		91.6%	-\$5,000	2,000	-29%
644.22 Book Fair	-\$1,298	-\$1,620	-\$2,300	-\$2,300		70.4%	-\$2,300	0	-0%

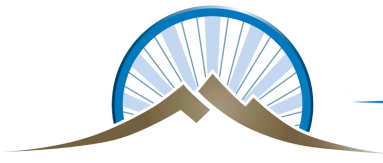
Budget Name	Prior Yr Budget	YTD Amount	Current Yr Budget	Forecast	% Target	% of Forecast	Next Yr Budget	\$ Change	% Change
650.21 Tech-Related Supplies		-\$2,470	-\$5,000	-\$3,000		82.3%	-\$3,000	0	-0%
670.1 Software	-\$17,000	-\$34,467	-\$40,000	-\$37,000		93.2%	-\$35,000	2,000	-5%
680.26 Maintenance & Cleaning Supplies	-\$19,000	-\$31,697	-\$31,000	-\$35,000		90.6%	-\$35,000	0	-0%
TOT	-\$249,998	-\$432,388	-\$465,100	-\$472,358			-\$404,100	68,258	
Promontory School of Expeditionary Learning - Expense - 700 Property (4 School Budget records)									
733.1 Furniture and Fixtures	-\$7,000	-\$8,637	-\$10,000	-\$8,637		100.0%	-\$3,000	5,637	-65%
734.1 Technology-Related Hardware	-\$150,000	-\$105,470	-\$50,000	-\$105,470		100.0%	-\$20,000	85,470	-81%
739.26 Maintenance Equipment	-\$5,000		-\$3,000	\$0			-\$2,000	-2,000	
739.31 Kitchen Equipment			-\$2,000	\$0			-\$2,000	-2,000	
TOT	-\$162,000	-\$114,108	-\$65,000	-\$114,107			-\$27,000	87,107	
Promontory School of Expeditionary Learning - Expense - 800 Debt Service and Misc (5 School Budget records)									
810.24 Dues and Fees	-\$4,200	-\$3,920	-\$3,500	-\$4,000		98.0%	-\$3,500	500	-13%
810.24 Charter School Association Dues	-\$2,688	-\$3,264	-\$3,700	-\$3,264		100.0%	-\$3,264	0	-0%
810.25 Background Checks	-\$700	-\$2,945	-\$2,100	-\$3,000		98.2%	-\$2,100	900	-30%
830 Facility Mortgage Payment	-\$407,583	-\$397,630	-\$554,989	-\$554,989		71.6%	-\$554,769	220	-0%
890.21 Misc. Expenditures	-\$1,000	-\$139	-\$2,000	-\$8,250		1.7%	-\$2,000	6,250	-76%
TOT	-\$416,171	-\$407,898	-\$566,289	-\$573,503			-\$565,633	7,870	
Promontory School of Expeditionary Learning - Expense - 900 CapEx & Extra Ordinary (1 School Budget)									
720.26 Land & Site Improvement		-\$31,772	-\$310,000	-\$31,772		100.0%	-\$122,000	-90,228	284%
TOT	\$0	-\$31,772	-\$310,000	-\$31,772			-\$122,000	-90,228	
TOT	-\$74,283	-\$393,062	\$45,274	-\$17,780			\$92,354	110,134	

Finance Manager : School Category | Next Year Category Budget

Next Year Category Budget

Category	Category Type	PY Amount	YTD Amount	Total Budget	Total Forecast	% Target	% Forecast	Total Next Yr Budget	Total Budget Change	% Change
Promontory School of Expeditionary Learning - Revenue (3 School Category records)										
1000 Local Revenue	Revenue		\$182,724	\$189,000	\$191,955	48.9%	95.2%	\$164,000	-27,955	-14.6%
3000 State Revenue	Revenue		\$4,828,796	\$5,721,545	\$5,575,831	86.7%	86.6%	\$5,429,720	-146,111	-2.6%
4000 Federal Revenue	Revenue		\$152,970	\$390,718	\$401,045	13.9%	38.1%	\$394,267	-6,778	-1.7%
TOT			\$5,164,489	\$6,301,263	\$6,168,831			\$5,987,987	-180,844	
Promontory School of Expeditionary Learning - Expense (9 School Category records)										
100 Salaries	Expense		-\$3,047,025	-\$3,147,500	-\$3,327,025	85.0%	91.6%	-\$3,142,100	184,925	-5.6%
200 Employee Benefits	Expense	-\$40,327	-\$859,226	-\$958,300	-\$914,267	89.6%	94.0%	-\$937,000	-22,733	2.5%
300 Professional and Technical Services	Expense	-\$6,976	-\$466,938	-\$464,300	-\$479,884	15.7%	97.3%	-\$455,300	24,584	-5.1%
400 Property Services	Expense	-\$4,166	-\$114,522	-\$175,000	-\$150,000	-0.0%	76.3%	-\$149,000	1,000	-0.7%
500 Other Services	Expense	-\$5,187	-\$83,675	-\$104,500	-\$123,695	-0.0%	67.6%	-\$93,500	30,195	-24.4%
600 Supplies and Materials	Expense	-\$2,180	-\$432,388	-\$465,100	-\$472,358	-0.0%	91.5%	-\$404,100	68,258	-14.5%
700 Property	Expense		-\$114,108	-\$65,000	-\$114,107	-0.0%	100.0%	-\$27,000	87,107	-76.3%
800 Debt Service and Misc	Expense		-\$407,898	-\$566,289	-\$573,503	-0.0%	71.1%	-\$565,633	7,870	-1.4%
900 CapEx & Extra Ordinary	Expense		-\$31,772	-\$310,000	-\$31,772	-0.0%	100.0%	-\$122,000	-90,228	284.0%
TOT		-\$58,837	-\$5,557,551	-\$6,255,989	-\$6,186,611			-\$5,895,633	290,978	
TOT		-\$58,837	-\$393,062	\$45,274	-\$17,780			\$92,354	110,134	

Tab 1



EMERGENCY RESPONSE PLAN POLICY

Promontory School will practice the Emergency Plan on each school level, present it to teachers and administrators, students, parents, local law enforcement and any other necessary public safety representatives.

The Emergency Plan will be reviewed by the Safety Committee (assigned by the Promontory School Board) and updated at least once every three years in order to have updated information and to be in compliance with R277-400.

Teachers and staff will have access to the Emergency Plan.

At the beginning of each school year, Promontory School shall provide a written notice to parents and staff of our Plan.

Promontory School shall designate a school Emergency Response/Emergency Preparedness week each year prior to April 30th.

The Plan shall include procedures to ensure that students receive reasonable, adequate educational services, and supervision during school hours during an emergency and for education services in an extended emergency situation.

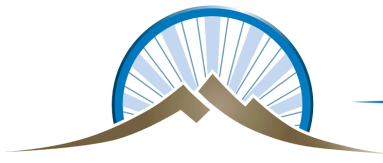
Evacuation procedures that provide reasonable care and supervision of students until students are released to a responsible party shall be included in the plan. Promontory shall not release students under 15 years old unless a parent or other responsible person has been notified and assumed responsibility for students.

The Emergency Plan shall include procedures regarding access to public school buildings by students, community members, and others. The Plan shall also include procedures regarding access during identified time periods and possession and use of school keys by designated administrators and employees.

The Plan shall identify resources and materials available for emergency training for employees. The Plan shall also include procedures for a student to receive age-appropriate emergency preparedness training including rescue techniques, first aid, safety measures appropriate for specific emergencies, and other emergency skills.

Promontory School shall establish a parent and student reunification plan, and annually provide parents a summary of parental expectations and notification procedures related to the reunification plan. The reunification plan shall be published on the school's website.

Fire drills and other emergency drills shall be conducted as outlined in R277-400. Promontory school shall develop student assistance programs such as care teams, school intervention programs, and



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interagency case management teams.

Promontory School may enter into cooperative agreements with other governmental entities to establish proper coordination and support during emergencies. Promontory School shall cooperate with other governmental entities to provide emergency relief services and the Plan shall contain procedures for assessing and providing the following for public emergency needs: school facilities, equipment, and personnel.

The plan shall delineate communication channels and lines of authority with the Promontory School, city, county, and state. A local governing board, through its director, is the chief officer for a school emergency.

Promontory School shall provide an annual training for school building staff regarding an employee's roles, responsibilities, and priorities as outlined in the Emergency Response Plan.

Promontory School shall develop standards and protections for participants and attendees at school-related activities, especially school-related activities off school property.

Promontory School shall review existing security measures and procedures within the school and make necessary adjustments as funding permits.

Promontory School shall provide comprehensive violence prevention and intervention strategies as part of a school's regular curriculum, including anger management, conflict resolution, respect for diversity and other cultures, and may provide age-appropriate instruction on firearm safety.

The plan shall address procedures for recording funds expected for emergencies, assessing and repairing damage, and seeking reimbursement for emergency expenditures.

Promontory School shall ensure that a carbon monoxide detection system has been installed and maintained in the school, consistent with International Fire Code. The school shall replace a carbon monoxide detection system that becomes inoperable or begins to produce end-of-life signals.

Updated Policy

Emergency Response Plan Policy

Purpose

The purpose of this policy is to establish the requirement for Promontory School to maintain a comprehensive Emergency Response Plan that supports the safety, protection, and welfare of students, staff, and school visitors; ensures coordinated preparedness and response during emergency situations; and maintains compliance with applicable state and federal laws and administrative rules.

Emergency Plan Requirements

Promontory School shall maintain an Emergency Response Plan designed to support the safety, protection, and welfare of students, staff, and school visitors during emergency situations.

The Emergency Response Plan shall be reviewed and updated at least once every three (3) years, or more frequently as needed to maintain compliance, reflect current safety best practices, or respond to changes in school operations or safety conditions.

The Emergency Response Plan shall include provisions to ensure the reasonable safety, supervision, and care of students during emergency situations, including procedures for student accountability and reunification with parents or authorized guardians.

Promontory School shall coordinate with local, state, and federal emergency management and public safety agencies as appropriate to support effective emergency preparedness, response, and recovery.

Administrative Procedures

Administration shall ensure that an Emergency Response Plan is developed, implemented, and maintained in accordance with applicable state and federal law, including Utah Administrative Code R277.

Administration may develop and maintain detailed operational procedures and supporting materials necessary to implement this policy effectively.

To support student safety and maintain the integrity of emergency response, certain operational procedures, security measures, or implementation details may be designated as confidential and not subject to public disclosure, consistent with applicable law.

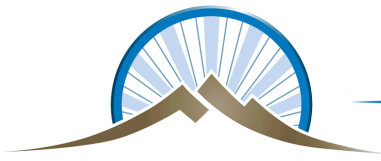
Emergency Preparedness and Drills

The school shall conduct emergency preparedness drills as required by state law and administrative rule to ensure readiness and reinforce staff and student understanding of emergency procedures.

Training and Communication

Promontory School shall ensure that staff are informed of the Emergency Response Plan and provided appropriate access and training regarding its contents. Staff should receive annual training on their roles and responsibilities within the Emergency Response Plan, including expectations for emergency response, safety procedures, and student supervision during emergency situations.

The school shall provide parents with general information regarding the existence and purpose of the Emergency Response Plan.



STUDENT ELECTRONIC DEVICE POLICY

PURPOSE

Promontory School of Expeditionary Learning is committed to maintaining a safe, focused, and respectful learning environment that supports academic excellence, positive behavior, and meaningful student engagement. To support learning and school culture, student personal electronic devices shall be limited during the school day consistent with applicable Utah law.

This policy is adopted in accordance with applicable Utah law, including Senate Bill 69 (2026) and related provisions of Utah Code governing student use of personal electronic devices in schools.

DEFINITIONS

Electronic devices include, but are not limited to:

- Cell phones
- Smart watches or wearable communication devices
- Earbuds/headphones
- Tablets
- Gaming devices
- Cameras
- Other personal communication or internet-enabled devices

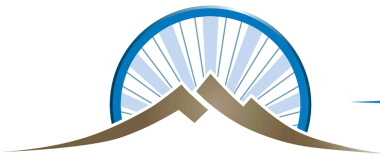
GENERAL RULE (BELL-TO-BELL)

Students may bring personal electronic devices to school at their own risk. Promontory School of Expeditionary Learning assumes no responsibility for lost, stolen, damaged, or misplaced devices.

Unless expressly authorized under this policy, all student electronic devices, including cell phones, smart watches, earbuds, and similar devices, shall remain silenced, not in use, and stored out of sight from the time a student arrives on campus or begins any school-supervised activity before the instructional day, throughout the regular school day, and until the student is dismissed from school or released from school supervision at the end of the day. This includes class time, passing periods, lunch, recess, Mega Crews, restrooms, and all other school-supervised times.

INSTRUCTIONAL USE

Student Electronic Device Policy	Created: 03/24/2016	Last Updated: 03/21/2024 09/15/2022
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A teacher or administrator may authorize limited, temporary student use of electronic devices for approved instructional purposes, research, fieldwork, assessments, accommodations, or other school-related activities consistent with School policy and applicable law. Such permission may be restricted or revoked at any time.

EXCEPTIONS

Exceptions may be granted for:

- Medical needs or health plans
- IEP / Section 504 accommodations
- Documented family emergencies
- Administrative approval
- Safety emergencies
- Administrative approval for documented educational, family, health, or operational necessity consistent with School policy and applicable law.

Requests for ongoing exceptions should be made to the Director or designee.

PROHIBITED CONDUCT

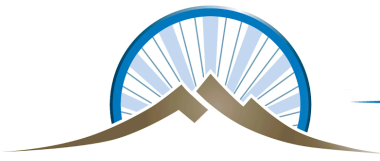
Students may not use electronic devices to:

- Cheat or engage in academic dishonesty;
- Bully, harass, threaten, intimidate, or retaliate against others;
- Record, photograph, livestream, or distribute images/audio/video of others without authorization;
- Access, store, or share inappropriate, unlawful, or disruptive content;
- Disrupt instruction, supervision, transportation, or school operations;
- Violate the privacy, safety, or rights of others;
- Use devices in restrooms, locker rooms, counseling offices, health rooms, or other private areas;
- or
- Violate any School technology, conduct, or acceptable use policy.

Prohibited conduct includes off-campus electronic conduct directed toward students or staff that materially disrupts the school environment, interferes with student safety or learning, or violates applicable law or School policy.

CONFISCATION / SEARCH

Student Electronic Device Policy	Created: 03/24/2016	Last Updated: 03/21/2024 09/15/2022
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Authorized administrators, or designated school personnel acting within their duties, may require a student to surrender an electronic device when this policy is violated or when reasonably necessary to maintain safety or order. Devices may be temporarily confiscated and returned in accordance with School procedures.

School officials may inspect an electronic device only when permitted by law and based upon reasonable suspicion of a violation of School policy, threat to safety, or unlawful conduct. Any inspection shall be reasonably related in scope to the circumstances giving rise to the suspicion.

PROGRESSIVE CONSEQUENCES

Violations of this policy may result in one or more of the following consequences:

1. Warning, reminder, or redirection;
2. Temporary confiscation of the device;
3. Parent or guardian pick-up requirement;
4. Loss of device privileges;
5. Detention, restorative action, or other school discipline;
6. Suspension for repeated, defiant, or serious misconduct, consistent with School policy and applicable law.

Consequences may vary based on the student's age, severity of the violation, intent, prior violations, cooperation, and impact on the learning environment.

Consistent with the Promontory belief that "We Are Crew, Not Passengers", students are expected to take responsibility for their choices, remain fully engaged in learning, and contribute positively to the school community.

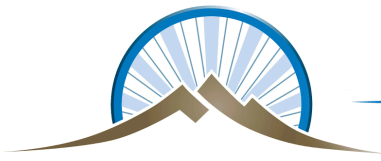
PARENT COMMUNICATION

Parents or guardians needing to contact students during the school day shall do so through the school office in order to protect instructional time, student safety, and compliance with School policy. Students may request assistance from the office or an administrator when communication with a parent or guardian is reasonably necessary due to illness, schedule changes, family matters, or other legitimate needs. In emergencies, the School will make reasonable efforts to facilitate prompt communication.

FIELDWORK / ACTIVITIES / TRANSPORTATION

This policy applies during fieldwork, extracurricular activities, school fieldwork transportation, and all other school-sponsored events. Limited alternative expectations may be established by the supervising employee or administration when reasonably necessary for instructional purposes, safety, communication, travel logistics, or the nature of the activity. Any such expectations may be restricted, modified, or revoked at any time.

Student Electronic Device Policy	Created: 03/24/2016	Last Updated: 03/21/2024 09/15/2022
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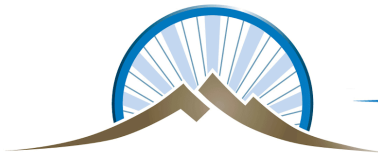
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NOTICE

This policy shall be published in student and family handbooks and communicated through other reasonable means as determined by the School. The Promontory School of Expeditionary Learning Board of Directors may amend this policy consistent with applicable law, and administration may establish procedures for implementation and enforcement.

Guided by the Promontory belief that we are Crew, Not Passengers, students are expected to be fully present in learning, relationships, responsibility, and community during the school day.



REPORTING FRAUD, ABUSE & WASTE POLICY

PURPOSE:

Promontory School of Expeditionary Learning encourages citizens, including school employees, to report suspected financial improprieties or violations of (i) laws or regulations by state and local governments, (ii) waste of public funds or resources, and/or (iii) constructive suggestions for improving state and local governments regarding financial-related matters, internal controls, or compliance.

POLICY:

Fraud, Waste, and Abuse Hotline Complaint Process :

You may report the condition to the Utah State Board of Education by calling their hotline at (801)538-7813 or email audit@schools.utah.gov, as listed on the school website. Please provide the following information on the suspected violation.

1. Description of the suspected violation.
2. The name of the employee(s) involved.
3. The school, division, and location where the action occurred.
4. When the action occurred.
5. Any other details that may be important for our investigation – other witnesses, evidence, documents, dollar amounts, time period, etcetera.
6. Specific law or regulation that has been violated if known.
7. Your name, address, and phone number if you desire to provide the information, although you can remain anonymous.

Each improper action should be noted separately and supported with as much specific information as possible. Supplying detailed information contributes to a thorough and efficient investigation. The above information should assist you in providing the details needed for an in-depth analysis. The identity of the complainant is considered protected information under the Utah Government Records Access and Management Act (Utah Code Section 63-2-304) if the complainant requests anonymity from parties outside the office. Additionally, the State whistleblower statute (Utah Code Section 67-21) protects government employees from reprisal by an employer for reporting, in good faith, suspected illegal acts or waste of public funds. A complaint made to the Hotline, identifying yourself, will provide the necessary communication to invoke the protection of the whistleblower statute. The identity of the complainant is considered protected information.

No employee, volunteer, board member, contractor, parent, or community member shall be subject to retaliation for making a good-faith report of suspected fraud, waste, abuse, or other misconduct.



Knowingly making false accusations or intentionally misleading investigators may result in disciplinary action.

Investigation Process

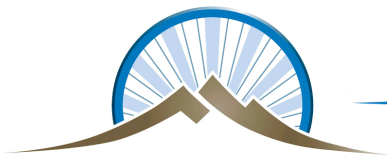
Reports may be:

- Investigated internally
- Referred to legal counsel
- Referred to law enforcement
- Referred to USBE
- Referred to other governmental agencies

Suspected misuse of federal funds, including Title I, IDEA, Title II, Title IV, federal nutrition programs, and other grant funds, shall be reported and investigated in accordance with applicable federal regulations.

Reports and investigations shall be maintained in accordance with applicable records retention requirements and confidentiality laws.

Tab 1



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~~Promontory School AI in Education Guidelines for Educators & Students~~ Artificial Intelligence Acceptable Use Policy

Purpose

This policy establishes clear expectations for the ethical, safe, and responsible use of Artificial Intelligence (AI) by students and staff, in alignment with our RISE FAR values. AI refers to digital tools and systems that analyze data, generate content, or perform tasks that typically require human intelligence, including generative AI tools (e.g., text, image, or content generation platforms).

Promontory School of Expeditionary Learning recognizes the importance of Artificial Intelligence (AI) as a valuable and practical educational resource that equips students for the challenges of college and future careers. As AI becomes an essential part of daily life, we aim to share these resources to offer effective practices that will empower educators and students. Our goal is to inspire innovative teaching methods and encourage the next generation of collaborative creators to engage with AI in a manner that prioritizes safety, appropriateness, and excellence.

Permitted and Prohibited Uses

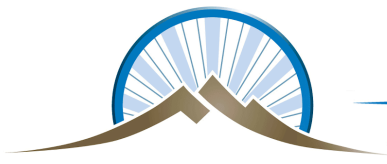
AI is a tool to support learning and creativity but does not replace critical thinking, original work, or academic integrity. AI may be used to support teaching and learning, including brainstorming, skill development, feedback, and content creation, when aligned with ethical practices. All users are expected to exercise due diligence and act in good faith when using AI tools.

All AI use must adhere to the following:

- Comply with applicable data privacy laws
- Align with school technology policies
- Uphold academic integrity expectations
- Users must be transparent about their use of AI
- AI tools should be implemented in a way that supports equitable access for all students
- Users must review AI-generated content for accuracy, quality, and appropriateness before use, especially in any outward-facing communication

AI in the Classroom:

- Staff are expected to:
 - Clearly communicate expectations for student AI use in assignments



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- Model ethical and appropriate AI use
- Review and verify AI-assisted content before use
- Maintain responsibility for all instructional decisions, grading, and communication
- Students are expected to:
 - Use AI as a support tool, not a replacement for thinking or learning
 - Follow teacher directions regarding AI use on assignments
 - Disclose AI use when required
 - Maintain academic integrity at all times

Prohibited Uses include:

- Submitting AI-generated work as original work when not authorized (i.e., plagiarism)
- Using AI tools during assessments unless explicitly approved in accordance with applicable law
- Any use that violates academic integrity, school policy, data privacy, or other applicable laws

Administration may develop additional procedures or guidance documents to support the effective use of AI in instructional settings. Unethical or illegal use of AI may result in formal disciplinary action and, when applicable, legal consequences.

AI shall not serve as the sole basis for grading, discipline decisions, special education eligibility determinations, student placement decisions, employee evaluations, hiring decisions, or other significant educational or employment decisions. Human review and professional judgment shall remain central to all decision-making processes.

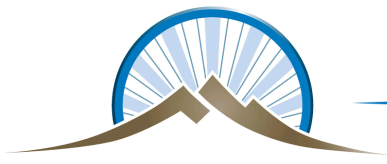
AI and Special Education Services

AI tools may support accommodations, accessibility, language support, and instructional planning. However, AI shall not replace legally required IEP team decisions, evaluations, progress monitoring, or special education services.

Data Privacy and Security

To protect sensitive information and individual privacy:

- Personally identifiable information (PII) and other legally protected or confidential data shall only be entered into AI systems that have been formally approved by Administration and include appropriate data privacy safeguards (e.g., data privacy agreements).
 - This includes student records, personal identifiers, staff information, and confidential communications.
- AI tools that are publicly accessible or lack formally approved, legally compliant safeguards shall not be used to input private, controlled, confidential, or otherwise legally protected data.



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- When using approved systems, users must follow all expectations regarding data handling and appropriate use, including applicable privacy laws and school policies.

AI Tool Review and Approval

Administration, or their designee, shall review and monitor AI tools used for school purposes to ensure alignment with the following standards:

- Data privacy and security
- Educational alignment
- Legal compliance

Use of AI tools for student instruction or school operations is permitted only when formally approved by Administration.

Parent Notification

Teachers shall communicate classroom expectations regarding student AI use when AI is incorporated into instructional activities or assignments.

Training and Responsible Use

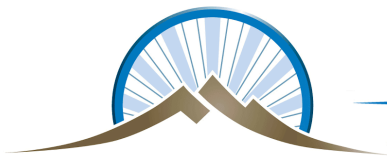
The school will provide ongoing training to school personnel regarding:

- Responsible and ethical AI use
- Data privacy and security
- Effective AI instructional integration
- New and evolving uses of AI technologies

Students should be educated on the ethical, appropriate, and responsible use of AI as part of classroom learning and academic expectations.

Monitoring and Incident Response

- Any staff member who becomes aware of misuse or a violation of this policy must notify Administration promptly.
- Incidents will be investigated and addressed by Administration, or their designee, in alignment with school data protection policies and applicable disciplinary procedures.
- AI misuse, data concerns, or policy violations must be documented and addressed through the school's data incident response procedures.
- When appropriate, incidents may be escalated to relevant governing authorities.
- The school will review and update practices as needed in response to emerging technologies.



AI in Education: Guidelines for Educators & Students

AI is All Around Us

- Search Engines
- Facial Recognition
- Smart Cars
- Smart Assistants
- E-Payments
- Media Streaming
- Text Editors
- Navigation Apps
- Social Media Feeds

Types of AI and where you will find them:

Reactive: Responds to data or inputs without learning from that data.

Examples - Adaptive testing, Alexa/Siri, Chess.com

Predictive: Analyzes a data set to learn and predict future events or decisions.

Examples - Netflix suggestions, Google Docs auto-finish, Youtube recommendations, weather forecasting systems

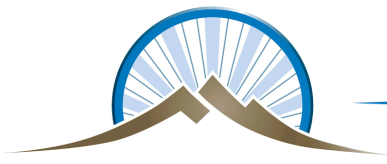
Generative: Creates new content & generates ideas from learned data patterns.

Examples - ChatGPT, Canva Text-to-Image, Adobe Firefly

AI in Education

For Educators:

- Chatbots for support: Online support will free up your time
- Resource recommendations: AI can recommend educational resources, tools, and materials specific to what you are looking for
- Data analysis: AI can analyze data for early identification of struggling students
- Enhance content creation: AI can create engaging learning materials like quizzes, images and simulations
- Facilitate administrative tasks: AI can streamline tasks like scheduling or tracking attendance
- Differentiated instruction: AI enables differentiated instruction by tailoring lessons to the diverse levels within your class
- Language translation: AI breaks down language barriers, translating content in real time



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- Accessibility: AI enhances accessibility in the classroom by providing transcription, text-to-speech and other assistive technologies

AI and Academic Integrity Matrix

Assignment Type	AI Allowed	Examples
Brainstorming	Yes	Idea generation
Editing	Yes	Grammar feedback
Research Support	Limited	Fact checking
Final Writing	Teacher decides	Must disclose
Assessments	No unless approved	Teacher permission required

Staff Communications

Staff may use AI to assist with drafting communications, lesson plans, reports, and instructional materials. Staff remain responsible for reviewing all AI-generated content for accuracy, tone, confidentiality, and appropriateness prior to distribution.

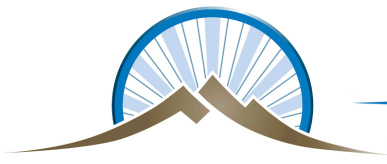
For students:

- Brainstorm: Brainstorm and then utilize those ideas to generate original work
- Clarify: Clarify understanding by asking for examples or explanations
- Feedback: Gather feedback on original writing by asking for review on grammar, clarity, transitions and more
- Create: Engage to create new materials based on student creativity
- Organize: Let AI help you organize your schedule and stay on top of important tasks and deadlines

AI DOES: provide a tool for supported learning

AI DOES NOT: replace critical thinking

As we integrate new technology into education we must hold true to our RISE FAR values and maintain integrity and responsibility when using these tools to foster innovation. **Passing off AI-generated content as original work is considered plagiarism.** Any student found using AI tools irresponsibly will face consequences set by the Administration and Classroom Teachers.

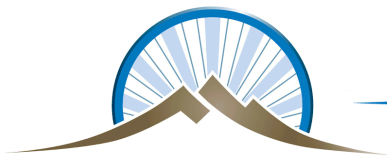


Educator Best Practices When Using AI Safely in Their Own Work

- **Ensure Data Privacy and Security:** Before using any AI tool, carefully consider student data privacy laws and policy, prioritizing data privacy measures to protect sensitive student information. Compliance with relevant data protection and PII regulations is crucial. Personally identifiable information (PII) is any information that can be used to identify a person. This includes direct identifiers like a name or Social Security number, as well as indirect identifiers like a gender or birth date.
 - Examples of PII:
 - Name, address, phone number, or email address
 - Social Security number, passport number, or driver's license number
 - Date and place of birth
 - Gender, race, or ethnicity
 - Biometric data like fingerprints or iris scans
 - Medical, educational, financial, or employment information
- **Establish Transparency and Accountability:** Ensure transparency when using AI algorithms in classrooms and in online interactions. Clearly articulate dos and don'ts. Students, teachers, and parents should have a clear understanding of how AI systems may be appropriately used, building trust and accountability for sound academic practices.
- **Engage in Professional Learning:** Engage in continuous professional development to enhance AI literacy and integration skills. In our dynamic educational landscape, stay informed about emerging trends to effectively navigate and leverage transformative changes.

Educator Best Practices When Using AI Safely with Students

- **Teach Ethical and Explainable Use:** Because modern generative AI tools can be easily used to create content related to any academic subject, students must be taught when and how to use them in a responsible and ethical manner. Model honesty, transparency, and explainability for students to best understand.
- **Modernize Assessment:** Prior assessment methods may need to be updated when allowing students to leverage AI on assignments and other learning tasks. Because instructional design has changed, effective assessment design will likely also require shifts. Therefore, adjust assessment design to focus more on process rather than product, considering a differentiated balance between AI contributions and student cognitive engagement.
- **Ensure Data Privacy and Security:** Before inviting students to use AI, ensure that the systems you recommend have been approved by the school administration and follow all current school policies.
- **Inform Appropriate Stakeholders:** Be transparent with parents, guardians, school administrators, and other appropriate stakeholders about how students will use AI to research,



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create, and learn, using a class disclosure or other means. Help others to understand that when used in an ethical and safe manner, AI can be a powerful tool for responsible learning.

- **Provide Learning Opportunities for All:** Ensure that AI technologies are accessible to all students. AI may provide opportunities to enable support for students with disabilities, multi-language learners, or other unique needs.
- **Monitor and Evaluate Effectiveness:** Regularly monitor and evaluate the impact of AI technologies on student learning outcomes. Adjust classroom policies and practices based on ongoing assessments to continuously improve the effectiveness and ethical use of AI in teaching and learning.

AI and Expeditionary Learning

Promontory believes that authentic learning experiences, fieldwork, craftsmanship, revision, collaboration, and student voice remain essential components of high-quality work. AI should be used to support inquiry, research, reflection, and creativity, but shall not replace authentic experiences, critical thinking, craftsmanship, or the production of original student work.


Approved AI Tool List

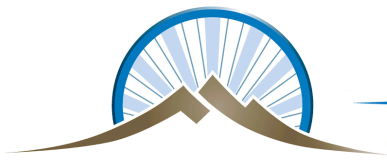
Administration may maintain and publish a list of approved AI tools for instructional and operational use.

Policy and Safe Use Considerations

- [ASD Guide for Choosing Technology Tools](#)
- [ASD Policy 6161: Selection and Adoption of Instructional Materials](#)
- [ASD Policy 7250: Acceptable Use of Technology Resources](#)
- [Children's Online Privacy Protection Act](#)
- [Family Education Rights and Privacy Act](#)
- [Utah State Code 53E-9-P3 - Student Data Protection](#)
- [Utah State Code 53E-9-204 - Access to Education Records](#)

Additional Resources

- <https://www.usu.edu/teach/help-topics/teaching-tips/ai-and-teaching>
- Cardona, M. A., Rodríguez, R. J., & Ishmael, K. (2023). [Artificial Intelligence and the Future of Teaching and Learning: Insights and Recommendations](#).
- *Alpine School District.*  [Best Practices for Using AI in the Classroom](#)




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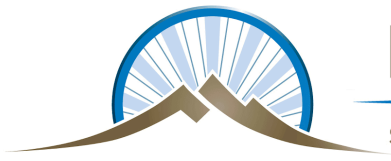
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- Curts, E. (2023). [*The ABC's of AI: What Educators Need to Know*](#).
- Elgersma, C. (2023, October 19). [*Free Resources to Explore and Use ChatGPT and AI*](#). Common Sense Education.
- ISTE. (2024, February 7). [*Artificial Intelligence in Education*](#).
- Miao, F., Holmes, W., Huang, R., & Zhang, H. (2021). [*AI and education: A guidance for policymakers*](#). UNESCO Publishing.

<https://www.google.com/url?q=https://www.utah.gov/pmn/files/1116147.pdf&sa=D&source=docs&ust=1737061071452237&usg=AOvVaw1aWeCudUDet0Rfagjk-pkU>

 Utah AI Policy Tracker

Board Policy



PROMONTORY SCHOOL ARTIFICIAL INTELLIGENCE (AI) ACCEPTABLE USE POLICY

Purpose

This policy establishes clear expectations for the ethical, safe, and responsible use of Artificial Intelligence (AI) by students and staff, in alignment with our RISE FAR values.

AI refers to digital tools and systems that analyze data, generate content, or perform tasks that typically require human intelligence, including generative AI tools (e.g., text, image, or content generation platforms).

Promontory School of Expeditionary Learning recognizes the importance of Artificial Intelligence (AI) as a valuable and practical educational resource that equips students for the challenges of college and future careers. As AI becomes an essential part of daily life, we aim to share these resources to offer effective practices that will empower educators and students. Our goal is to inspire innovative teaching methods and encourage the next generation of collaborative creators to engage with AI in a manner that prioritizes safety, appropriateness, and excellence.

Permitted and Prohibited Uses

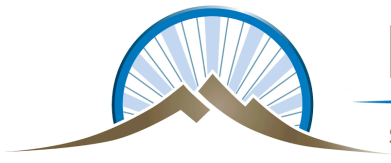
AI is a tool to support learning and creativity but does not replace critical thinking, original work, or academic integrity. AI may be used to support teaching and learning, including brainstorming, skill development, feedback, and content creation, when aligned with ethical practices. All users are expected to exercise due diligence and act in good faith when using AI tools.

All AI use must adhere to the following:

- Comply with applicable data privacy laws.
- Align with school technology policies.
- Uphold academic integrity expectations.
- Users must be transparent about their use of AI.
- AI tools should be implemented in a way that supports equitable access for all students.
- Users must review AI-generated content for accuracy, quality, and appropriateness before use, especially in any outward-facing communication.

AI in the Classroom

Staff are expected to:



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- Clearly communicate expectations for student AI use in assignments.
- Model ethical and appropriate AI use.
- Review and verify AI-assisted content before use.
- Maintain responsibility for all instructional decisions, grading, and communication.

Students are expected to:

- Use AI as a support tool, not a replacement for thinking or learning.
- Follow teacher directions regarding AI use on assignments.
- Disclose AI use when required.
- Maintain academic integrity at all times.
- Students shall only access AI tools approved by the school and in accordance with applicable age requirements, data privacy requirements, and school technology policies.

Prohibited Uses

Prohibited uses include:

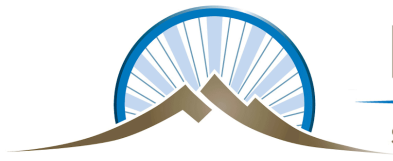
- Submitting AI-generated work as original work when not authorized (i.e., plagiarism).
- Using AI tools during assessments unless explicitly approved in accordance with applicable law and teacher expectations.
- Using AI in a manner that violates academic integrity, school policy, data privacy requirements, copyright laws, or other applicable laws.
- Entering personally identifiable information (PII), student records, confidential information, or protected data into unapproved AI systems.
- Using AI platforms, applications, extensions, or services that have not been approved by the school when student information is involved.

Administration may develop additional procedures or guidance documents to support the effective use of AI in instructional settings. Unethical or illegal use of AI may result in disciplinary action and, when applicable, legal consequences.

Human Oversight and Professional Judgment

AI shall not serve as the sole basis for grading, discipline decisions, special education eligibility determinations, student placement decisions, employee evaluations, hiring decisions, or other significant educational or employment decisions.

Human review and professional judgment shall remain central to all decision-making processes.



AI and Special Education Services

AI tools may support accommodations, accessibility, language supports, and instructional planning. However, AI shall not replace legally required IEP team decisions, evaluations, progress monitoring, or special education services.

Data Privacy and Security

To protect sensitive information and individual privacy:

- Personally identifiable information (PII) and other legally protected or confidential data shall only be entered into AI systems that have been formally approved by Administration and include appropriate data privacy safeguards (e.g., data privacy agreements).
- This includes student records, personal identifiers, staff information, and confidential communications.
- AI tools that are publicly accessible or lack formally approved, legally compliant safeguards shall not be used to input private, controlled, confidential, or otherwise legally protected data.
- When using approved systems, users must follow all expectations regarding data handling and appropriate use, including applicable privacy laws and school policies.

AI Tool Review and Approval

Administration, or their designee, shall review and monitor AI tools used for school purposes to ensure alignment with the following standards:

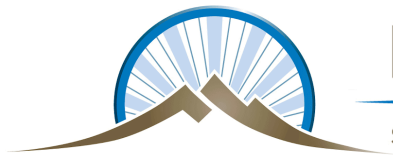
- Data privacy and security.
- Educational alignment.
- Legal compliance.

Use of AI tools for student instruction, student use, employee use involving student information, or school operations is permitted only when formally approved by Administration.

No AI platform, application, extension, chatbot, or service may be used with student information until approved through the school's instructional resource approval process and, when applicable, a Data Privacy Agreement (DPA) has been executed.

Parent Notification

The school shall communicate expectations regarding the appropriate use of AI by students and staff.



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Training and Responsible Use

The school will provide ongoing training to school personnel regarding:

- Responsible and ethical AI use.
- Data privacy and security.
- Effective AI instructional integration.
- New and evolving uses of AI technologies.

Students should be educated on the ethical, appropriate, and responsible use of AI as part of classroom learning and academic expectations.

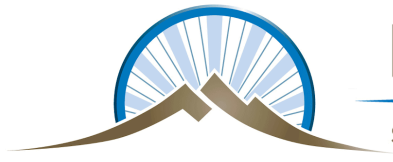
Monitoring and Incident Response

- Any staff member who becomes aware of misuse or a violation of this policy must notify Administration promptly.
- Incidents will be investigated and addressed by Administration or their designee in alignment with school data protection policies and applicable disciplinary procedures.
- AI misuse, data concerns, or policy violations must be documented and addressed through the school's data incident response procedures.
- When appropriate, incidents may be escalated to relevant governing authorities.
- The school will review and update practices as needed in response to emerging technologies.

Authority

The School Director or designee may establish procedures, approved tool lists, training expectations, and implementation guidance necessary to carry out this policy.

Administrative Procedure & Best Practices



ARTIFICIAL INTELLIGENCE (AI) PROCEDURES AND BEST PRACTICES GUIDE

PURPOSE

This guide supports the implementation of the Promontory School Artificial Intelligence (AI) Acceptable Use Policy by providing practical expectations, examples, and best practices for educators and students.

AI is a rapidly evolving technology. This guide may be updated by Administration as technologies, laws, educational practices, and school needs evolve.

UNDERSTANDING ARTIFICIAL INTELLIGENCE

Artificial Intelligence (AI) refers to digital tools and systems that analyze data, generate content, or perform tasks that typically require human intelligence.

TYPES OF AI

Reactive AI

Responds to data or inputs without learning from that data.

Examples:

- Adaptive testing
- Alexa
- Siri
- Chess.com

Predictive AI

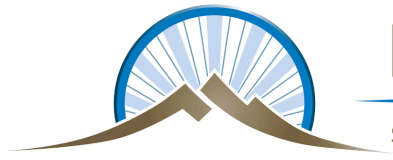
Analyzes data sets to learn and predict future events or decisions.

Examples:

- Netflix recommendations
- Google Docs autofill
- YouTube recommendations
- Weather forecasting systems

Generative AI

Creates new content and generates ideas from learned data patterns.



Examples:

- ChatGPT
- Canva Text-to-Image
- Adobe Firefly

AI IN EDUCATION

For Educators

AI may be used to support instructional planning, efficiency, differentiation, and communication.

Examples include:

- Chatbots for support
- Resource recommendations
- Data analysis
- Content creation
- Administrative task support
- Differentiated instruction
- Language translation
- Accessibility supports

Educators remain responsible for all instructional decisions, grading practices, communications, and professional judgment.

For Students

Students may use approved AI tools to support learning when authorized by their teacher and in accordance with school policies, classroom expectations, and age-appropriate guidelines.

Appropriate uses may include:

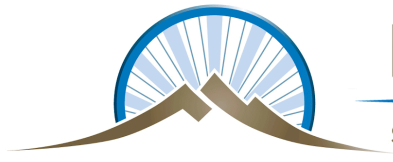
Brainstorm: Generate ideas that support original student work.

Clarify: Seek explanations, examples, and clarification of concepts.

Feedback: Receive feedback regarding grammar, organization, transitions, and writing clarity.

Create: Develop new materials and projects that build upon student creativity.

Organize: Assist with schedules, planning, and task management. **Brainstorm**



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~~Generate ideas that support original student work.~~

~~Clarify~~

~~Seek explanations, examples, and clarification of concepts.~~

~~Feedback~~

~~Receive feedback regarding grammar, organization, transitions, and writing clarity.~~

~~Create~~

~~Develop new materials and projects that build upon student creativity.~~

~~Organize~~

~~Assist with schedules, planning, and task management.~~

Remember

AI DOES: Provide a tool for supported learning.

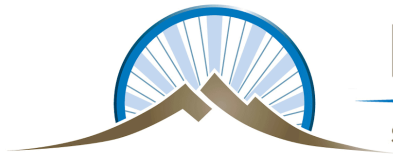
AI DOES NOT: Replace critical thinking, creativity, craftsmanship, or original student work.

ACADEMIC INTEGRITY

As we integrate new technology into education, we must hold true to our RISE FAR values and maintain integrity and responsibility when using these tools to foster innovation.

Passing off AI-generated content as original work is considered plagiarism.

Any student found using AI tools irresponsibly may face consequences consistent with school policies and classroom expectations.



ACADEMIC INTEGRITY MATRIX

Assignment Type	AI Allowed	Example
Brainstorming	Yes	Idea generation
Editing	Yes	Grammar feedback
Research Support	Limited	Fact-checking
Final Writing	Teacher Determines	Must disclose AI use if required
Assessments	No, unless approved	Teacher permission required

Teachers retain authority to determine acceptable AI use within classroom assignments.

Staff Expectations

Staff members are expected to:

- Model ethical and appropriate AI use.
- Clearly communicate expectations for student AI use.
- Verify AI-generated content before sharing or using it.
- Maintain confidentiality and data privacy requirements.
- Exercise professional judgment when integrating AI into instruction.
- Use only approved AI tools for student-related purposes.
- Follow all school technology, privacy, and instructional policies.

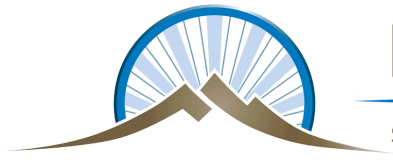
Student Expectations

Students are expected to:

- Use AI as a support tool, not a replacement for learning.
- Follow teacher directions regarding AI use.
- Disclose AI use when required.
- Maintain academic integrity.
- Use only approved AI tools when directed by school staff.
- Respect school technology and acceptable use expectations.

Educator Best Practices When Using AI

Ensure Data Privacy and Security



Before using any AI tool, carefully consider student data privacy laws and school policy.

Personally identifiable information (PII) includes:

- Names
- Addresses
- Phone numbers
- Email addresses
- Student identification numbers
- Dates of birth
- Educational records
- Medical information
- Financial information
- Employment information
- Biometric information

Never enter protected student information into an AI system unless the platform has been formally approved by Administration and includes appropriate privacy protections and data agreements.

Establish Transparency and Accountability

Students, teachers, and families should understand:

- When AI is being used
- Why AI is being used
- Appropriate uses of AI
- Limitations of AI

Transparency builds trust and supports responsible learning practices.

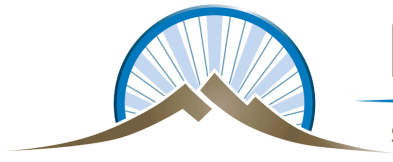
Engage in Professional Learning

Staff members are encouraged to participate in ongoing professional learning related to:

- AI literacy
- Emerging technologies
- Instructional integration
- Data privacy
- Ethical use of AI

BEST PRACTICES WHEN USING AI WITH STUDENTS

Teach Ethical and Explainable Use



Students should be taught when, why, and how AI may be used appropriately.

Model honesty, transparency, and responsible use.

Modernize Assessment

When AI is permitted, assessment practices may need to shift toward evaluating:

- Student thinking
- Process
- Reflection
- Revision
- Application of learning

rather than solely evaluating final products.

Ensure Data Privacy and Security

Only approved AI systems may be used with students.

Teachers should verify that all recommended tools comply with current school privacy expectations.

Inform Appropriate Stakeholders

Teachers should communicate classroom expectations regarding AI use when AI is incorporated into instruction or assignments.

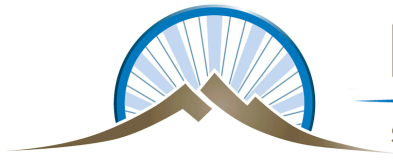
Families should understand how AI may be used to support learning.

Provide Learning Opportunities for All

AI should be implemented in ways that support equitable access and learning opportunities for all students.

AI may provide additional support for:

- Students with disabilities
- Multilingual learners
- Students requiring accessibility supports



- Students needing differentiated instruction

Monitor and Evaluate Effectiveness

Teachers should regularly evaluate the impact of AI tools on student learning and adjust practices as needed.

AI AND EXPEDITIONARY LEARNING

Promontory believes that authentic learning experiences, fieldwork, craftsmanship, revision, collaboration, and student voice remain essential components of high-quality work.

AI should be used to support inquiry, research, reflection, and creativity, but shall not replace authentic experiences, critical thinking, craftsmanship, or the production of original student work.

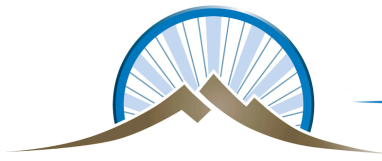
AI is a tool that supports learning. It is not a substitute for the habits of scholarship, quality work, and character development that are central to Expeditionary Learning.

APPROVED AI TOOLS

Administration may maintain and publish a list of approved AI tools for instructional and operational use.

Only approved tools may be used when student information, instructional activities, or school operations are involved.

Tab 1



STUDENT/PARENT RIGHTS UNDER FERPA FOR ELEMENTARY AND SECONDARY SCHOOLS

Promontory School of Expeditionary Learning

The Family Educational Rights and Privacy Act (FERPA) affords parents and students who are 18 years of age or older ("eligible students") certain rights with respect to the student's education records. These rights are:

1. The right to inspect and review the student's education records within 45 days after the day the Promontory School receives a request for access.

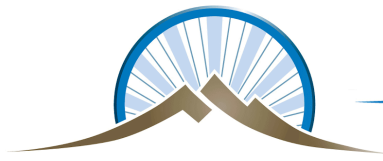
Parents or eligible students who wish to inspect their child's or their education records should submit to the school director a written request that identifies the records they wish to inspect. The school official will make arrangements for access and notify the parent or eligible student of the time and place where the records may be inspected.

2. The right to request the amendment of the student's education records that the parent or eligible student believes are inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA.

Parents or eligible students who wish to ask Promontory School to amend their child's or their education record should write to the school director, clearly identify the part of the record they want changed, and specify why it should be changed. If the school decides not to amend the record as requested by the parent or eligible student, the school will notify the parent or eligible student of the decision and of their right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the parent or eligible student when notified of the right to a hearing.

3. The right to provide written consent before the school discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

One exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. The criteria for determining who constitutes a school official and what constitutes a legitimate educational interest must be set forth in the school's or school district's annual notification for FERPA rights. A school official typically includes a person employed by the school or school district as an administrator, supervisor, instructor, or support staff member (including health or medical staff and law enforcement unit personnel) or a person serving on the school board. A school official also may include a volunteer, contractor, or consultant who, while not employed by the school, performs an institutional service or function for which the school would otherwise use its own employees and who is under the direct control



of the school with respect to the use and maintenance of PII from education records, such as an attorney, auditor, medical consultant, or therapist; a parent or student volunteering to serve on an official committee, such as a disciplinary or grievance committee; or a parent, student, or other volunteer assisting another school official in performing his or her tasks. A school official typically has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

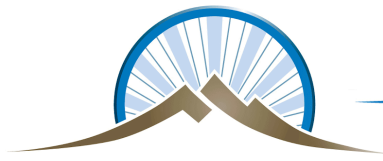
4. The right to file a complaint with the U.S. Department of Education concerning alleged failures by the [School] to comply with the requirements of FERPA. The name and address of the Office that administers FERPA are:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

See the list below of the disclosures that elementary and secondary schools may make without consent.

FERPA permits the disclosure of PII from students' education records, without consent of the parent or eligible student, if the disclosure meets certain conditions found in § 99.31 of the FERPA regulations. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the parent or eligible student, § 99.32 of the FERPA regulations requires the school to record the disclosure. Parents and eligible students have a right to inspect and review the record of disclosures. A school may disclose PII from the education records of a student without obtaining prior written consent of the parents or the eligible student –

- To other school officials, including teachers, within the educational agency or institution whom the school has determined to have legitimate educational interests. This includes contractors, consultants, volunteers, or other parties to whom the school has outsourced institutional services or functions, provided that the conditions listed in § 99.31(a)(1)(i)(B)(1) - (a)(1)(i)(B)(3) are met. (§ 99.31(a)(1))
- To officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll, or where the student is already enrolled if the disclosure is for purposes related to the student's enrollment or transfer, subject to the requirements of § 99.34. (§ 99.31(a)(2))
- To authorized representatives of the U. S. Comptroller General, the U. S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, such as the State educational agency (SEA) in the parent or eligible student's State. Disclosures under this provision may be made, subject to the requirements of § 99.35, in connection with an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or



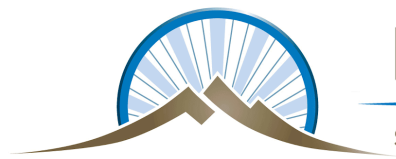
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compliance with Federal legal requirements that relate to those programs. These entities may make further disclosures of PII to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf, if applicable requirements are met. (§§ 99.31(a)(3) and 99.35)

- In connection with financial aid for which the student has applied or which the student has received, if the information is necessary for such purposes as to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid. (§ 99.31(a)(4))
- To State and local officials or authorities to whom information is specifically allowed to be reported or disclosed by a State statute that concerns the juvenile justice system and the system's ability to effectively serve, prior to adjudication, the student whose records were released, subject to § 99.38. (§ 99.31(a)(5))
- To organizations conducting studies for, or on behalf of, the school, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction, if applicable requirements are met. (§ 99.31(a)(6))
- To accrediting organizations to carry out their accrediting functions. (§ 99.31(a)(7))
- To parents of an eligible student if the student is a dependent for IRS tax purposes. (§ 99.31(a)(8))
- To comply with a judicial order or lawfully issued subpoena if applicable requirements are met. (§ 99.31(a)(9))
- To appropriate officials in connection with a health or safety emergency, subject to § 99.36. (§ 99.31(a)(10))
- Information the school has designated as "directory information" if applicable requirements under § 99.37 are met. (§ 99.31(a)(11))
- To an agency caseworker or other representative of a State or local child welfare agency or tribal organization who is authorized to access a student's case plan when such agency or organization is legally responsible, in accordance with State or tribal law, for the care and protection of the student in foster care placement. (20 U.S.C. § 1232g(b)(1)(L))
- To the Secretary of Agriculture or authorized representatives of the Food and Nutrition Service for purposes of conducting program monitoring, evaluations, and performance measurements of programs authorized under the Richard B. Russell National School Lunch Act or the Child Nutrition Act of 1966, under certain conditions. (20 U.S.C. § 1232g(b)(1)(K))

Tab 2



STUDENT/PARENT RIGHTS UNDER FERPA ANNUAL NOTICE OF RIGHTS

PURPOSE

The Family Educational Rights and Privacy Act (FERPA) affords parents and students who are 18 years of age or older ("eligible students") certain rights regarding the student's education records. Promontory School of Expeditionary Learning is committed to protecting student privacy and maintaining the confidentiality of student records in accordance with FERPA, Utah student privacy laws, Utah State Board of Education (USBE) requirements, and applicable federal and state regulations.

ANNUAL NOTICE

Promontory School of Expeditionary Learning provides this notice annually to all parents and eligible students in accordance with FERPA. This notice outlines the rights of parents and eligible students regarding student education records and the school's responsibilities related to student privacy and data protection.

These rights include:

❖ RIGHT TO INSPECT AND REVIEW EDUCATION RECORDS

Parents or eligible students have the right to inspect and review the student's education records within forty-five (45) days of submitting a request.

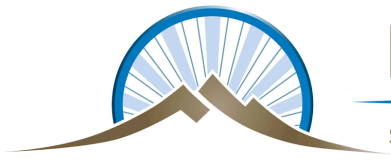
Requests should be submitted in writing to the School Director and should identify the records requested for review. The school will notify the parent or eligible student of the time and location where records may be inspected.

❖ RIGHT TO REQUEST AMENDMENT OF EDUCATION RECORDS

Parents or eligible students have the right to request that Promontory amend records believed to be inaccurate, misleading, or in violation of the student's privacy rights.

Requests must:

- Be submitted in writing to the School Director;
- Clearly identify the portion of the record to be amended; and
- State the reason for the requested amendment.



If the school denies the request, the parent or eligible student will be notified of the decision and provided information regarding the right to a hearing.

❖ RIGHT TO CONSENT TO DISCLOSURE OF EDUCATION RECORDS

Parents and eligible students have the right to provide written consent before personally identifiable information (PII) from education records is disclosed, except when FERPA authorizes disclosure without consent.

Promontory may disclose education records without prior consent to school officials who have legitimate educational interests.

School officials may include:

- Teachers
- Administrators
- Counselors
- Special education personnel
- Related service providers
- Board members
- School resource personnel
- Contractors
- Consultants
- Auditors
- Attorneys
- Therapists
- Student teachers
- Practicum students
- Volunteers performing school-authorized duties
- Educational technology providers operating under approved student data privacy agreements

A school official has a legitimate educational interest when access to education records is necessary to fulfill professional responsibilities on behalf of the school.

STUDENT DATA GOVERNANCE

Promontory School has designated a Student Data Manager responsible for overseeing compliance with federal and state student data privacy requirements, including FERPA, Utah student data protection laws, and Utah State Board of Education (USBE) data governance requirements.



The Student Data Manager shall:

- Monitor compliance with student data privacy laws and regulations;
- Assist with requests regarding student records and data privacy;
- Coordinate responses to data privacy concerns;
- Oversee approved educational technology applications and vendors;
- Ensure appropriate safeguards are maintained for student information.

SCHOOL COMMUNICATION SYSTEMS

Promontory School utilizes approved communication platforms and information systems to facilitate communication between the school and families.

Student and parent contact information may be used through approved school communication systems, including email, phone, text messaging, and school communication platforms, for educational, safety, attendance, transportation, and school operational purposes.

The school will not use student information for commercial purposes and will only share information with approved service providers operating under applicable privacy protections.

STUDENT DATA PRIVACY AND EDUCATIONAL TECHNOLOGY

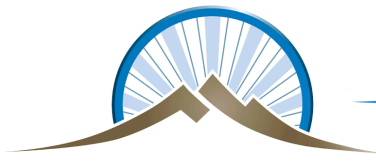
Promontory utilizes educational technology platforms and digital learning tools to support instruction, assessment, communication, intervention, and school operations.

These systems may include educational software, learning management systems, assessment platforms, communication systems, and student information systems.

The school only shares student information with approved vendors and service providers consistent with:

- FERPA
- Utah Student Data Protection laws
- Utah Code Title 53E, Chapter 9
- USBE Data Governance requirements
- Applicable data privacy agreements

Educational technology providers are prohibited from using student information for advertising, marketing, or non-educational purposes.



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FIELDWORK, EXPEDITIONS, AND STUDENT WORK

As an Expeditionary Learning school, Promontory provides students with opportunities to participate in:

- Fieldwork
- Service learning
- Expeditions
- Celebrations of Learning
- Exhibitions
- Performances
- Community partnerships
- Outdoor learning experiences

Student work products, presentations, photographs, videos, and project artifacts generated through these educational experiences may become part of a student's educational record and will be protected consistent with FERPA and applicable privacy laws.

DIRECTORY INFORMATION

Promontory School may designate certain information as "Directory Information."

Directory Information may include:

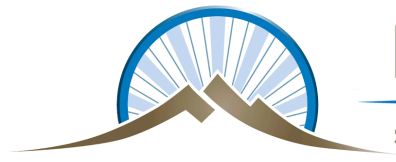
- Student name
- Grade level
- Participation in officially recognized activities and programs
- Honors, awards, and recognitions
- Student artwork and academic work displayed publicly
- Photographs and videos used in school publications, school websites, yearbooks, social media, and other school communications

Parents or eligible students who do not wish Directory Information to be disclosed must notify the school in writing within ten (10) school days of enrollment or within ten (10) school days of receiving this annual notice.

DIRECTORY INFORMATION OPT-OUT

Parents and eligible students have the right to refuse the disclosure of directory information.

A written request to withhold directory information must be submitted:



- Annually at the beginning of each school year; or
- Within ten (10) school days of enrollment.

The request shall remain in effect for the current school year unless revoked in writing by the parent or eligible student.

The school may be unable to include students in yearbooks, honor rolls, awards programs, school publications, media releases, or other school communications when a directory information opt-out request is in place.

RECORD OF DISCLOSURES

FERPA requires the school to maintain a record of certain disclosures of personally identifiable information from student records.

Parents and eligible students have the right to inspect records documenting those disclosures as permitted by law.

QUESTIONS REGARDING STUDENT RECORDS

Questions regarding student records, FERPA rights, directory information, or student data privacy may be directed to:

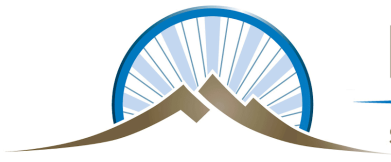
Director
Promontory School of Expeditionary Learning
1051 West 2700 South
Perry, Utah 84302
(435) 919-1282

The school will make reasonable efforts to respond to requests and inquiries regarding student records in a timely manner and in accordance with applicable law.

RIGHT TO FILE A COMPLAINT

Parents and eligible students have the right to file a complaint with the U.S. Department of Education concerning alleged failures by Promontory School of Expeditionary Learning to comply with FERPA requirements.

Family Policy Compliance Office
U.S. Department of Education



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400 Maryland Avenue, SW
Washington, DC 20202

DISCLOSURES PERMITTED WITHOUT CONSENT

FERPA permits schools to disclose personally identifiable information without prior consent under circumstances authorized by federal law, including but not limited to:

- School officials with legitimate educational interests;
- Schools where a student seeks or intends to enroll;
- Federal, state, and local educational authorities conducting audits or evaluations;
- Financial aid determinations;
- Juvenile justice system officials as permitted by law;
- Organizations conducting studies on behalf of schools;
- Accrediting organizations;
- Parents of dependent students;
- Judicial orders and lawfully issued subpoenas;
- Health and safety emergencies;
- Child welfare agencies responsible for the care of a student;
- Food and Nutrition Service program monitoring activities; and
- Other disclosures authorized by FERPA and applicable law.

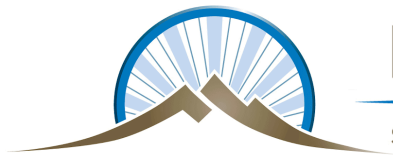
DATA SECURITY

Promontory School is committed to protecting student information and maintaining reasonable safeguards to prevent unauthorized access, disclosure, or misuse of student records. The school will respond to data security incidents in accordance with applicable law, USBE guidance, and school procedures.

Questions regarding FERPA rights or student records may be directed to the School Director.

Legal References

- Family Educational Rights and Privacy Act (20 U.S.C. §1232g)
- 34 CFR Part 99
- Utah Code 53E-9 (Student Privacy and Data Protection)
- Utah Student Data Protection Act
- USBE Data Governance Plan Requirements

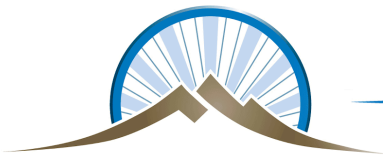


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- Utah GRAMA (Government Records Access and Management Act)

Tab 1



USE OF STUDENT DIRECTORY INFORMATION

The Use of Student Directory Information form is distributed to all parents/guardians at the beginning of each school year or with new student registration paperwork.

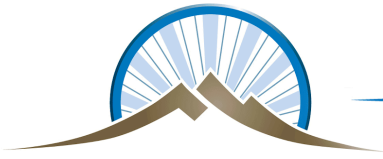
The Family Education Rights and Privacy Act (FERPA**), is a Federal law that protects the privacy of student education records. This law authorizes the routine release of directory information on students without written consent, unless a child's parent/guardian has advised the school to withhold the information. Directory information is generally not considered harmful or an invasion of privacy if released.

Promontory has designated the following information as directory information:

- Student name
- Student grade level
- Student date of birth
- Student address
- Student telephone number and email (*this is not printed in school publications*)
- Student ID number, user ID, or other unique personal identifier used to communicate in electronic systems but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user's identity, such as a PIN, password, or other factor known or possessed only by the authorized user.
- A student ID number or other unique personal identifier that is displayed on a student ID badge, but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user's identity, such as a PIN, password, or other factor known or possessed only by the authorized user.
- Parent email address, phone number (*this is not printed in school publications*)
- Participation in officially recognized school activities
- Degrees, honors, and awards received
- Most recent educational institution attended by student
- Student photographs/video images (*yearbook, newspaper, social media, school website*)
- Student dates of attendance

The primary purpose of directory information is to allow school districts to include student information or school work in certain school publications. Some examples of how student directory information will be used may include, but are not limited to:

- School publications, such as the school newsletter/magazine, student fieldwork journals, the school yearbook, school social media pages, and the school website, which may include pictures and written accounts of the activities of our students.
- Classroom activities, presentations, or other events sponsored by the school may be photographed, documented, or displayed.
- Books and other projects compiled by students may contain photographs, classwork, and the



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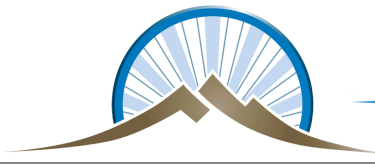
names of contributing students.

- Teachers may showcase student projects in their classroom and display cases throughout the school or post student photos and class projects on the school's website.
- Local media, such as TV or newspapers, may report or publish stories on our students and the work they are doing.

Please note that no photograph of a student individually identified by name, or group photo in which students are individually identified by name will be published on the internet.

Your student's directory information will be used by the school as stated above. Please consider very carefully your decision to withhold the release of "directory information." If you would like to **opt-out** of the sharing of directory information, please send a **written** notification to the school director within the first two weeks of school or within two weeks of a student's enrollment in Promontory School. If you do opt out, please understand that your child will not be included in the yearbook or be recognized in newspapers or school publications.

Tab 2



USE OF STUDENT DIRECTORY INFORMATION

PURPOSE

Promontory School of Expeditionary Learning annually provides notice regarding the use of student directory information in accordance with the Family Educational Rights and Privacy Act (FERPA), Utah student privacy laws, and Utah State Board of Education (USBE) requirements.

FERPA permits schools to disclose designated directory information without prior written consent unless a parent or eligible student submits a written request to withhold such information.

Directory information is information generally not considered harmful or an invasion of privacy if disclosed.

DIRECTORY INFORMATION DESIGNATED BY PROMONTORY SCHOOL

Promontory School has designated the following information as directory information:

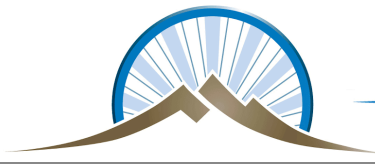
- Student name
- Grade level
- Participation in officially recognized school activities and programs
- Honors, awards, recognitions, and achievements
- Student dates of attendance
- Student work products displayed as part of educational programs
- Student photographs and video images
- Student participation in fieldwork, expeditions, performances, exhibitions, celebrations of learning, service projects, athletics, clubs, and other school-sponsored activities
- The most recent educational institution attended

Student identification numbers, usernames, and electronic identifiers may only be disclosed when they cannot be used to gain access to education records without additional authentication.

HOW DIRECTORY INFORMATION MAY BE USED

Directory information may be used in school-sponsored publications and communications, including:

- School newsletters
- Yearbooks
- Celebration of Learning materials
- Student fieldwork journals
- School websites
- School social media platforms
- School-produced videos
- Awards programs
- Graduation and promotion programs



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- Student recognition displays
- Local news media coverage
- Community partnership publications
- School marketing and recruitment materials

As an Expeditionary Learning school, Promontory may also use directory information in connection with:

- Expeditions
- Fieldwork experiences
- Student exhibitions
- Service-learning projects
- Community presentations
- Public displays of student work

STUDENT PHOTOGRAPHS AND VIDEO

Promontory may photograph, record, or otherwise document students participating in educational activities, fieldwork, celebrations of learning, performances, service projects, assemblies, and other school-sponsored events.

Photographs and video may be used in:

- School publications
- Yearbooks
- School websites
- Official school social media accounts
- Promotional and informational materials
- Local media coverage

The school will make reasonable efforts to avoid publishing a student's full name in connection with photographs posted publicly on the internet unless additional consent has been provided or disclosure is otherwise authorized by law.

EDUCATIONAL TECHNOLOGY AND DIGITAL PLATFORMS

Promontory utilizes approved educational technology platforms and communication systems to support instruction, assessment, communication, and school operations.

Student information may be used within approved educational technology systems consistent with:

- FERPA
- Utah Code Title 53E, Chapter 9
- USBE Data Governance requirements
- Applicable student data privacy agreements



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The school does not authorize the use of student information for advertising, marketing, or non-educational purposes.

PARENT AND STUDENT RIGHT TO OPT OUT

Parents or eligible students may request that directory information not be disclosed. Requests must be submitted in writing to the School Director:

- Within ten (10) school days of enrollment; or
- Within ten (10) school days of receiving the annual FERPA notice.

An opt-out request remains in effect for the current school year unless revoked in writing.

Parents should carefully consider the consequences of opting out. Students with directory information restrictions may not be included in:

- Yearbooks
- Awards programs
- School publications
- School social media posts
- News releases
- Celebration of Learning materials
- Student recognition programs

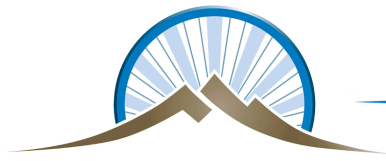
QUESTIONS REGARDING DIRECTORY INFORMATION

Questions regarding directory information, student privacy, or FERPA rights may be directed to:

Director
Promontory School of Expeditionary Learning
1051 West 2700 South
Perry, Utah 84302

LEGAL REFERENCES

- Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g
- 34 CFR Part 99
- Utah Code Title 53E, Chapter 9 – Student Privacy and Data Protection
- Utah State Board of Education Data Governance Requirements
- Government Records Access and Management Act (GRAMA)



EQUIPMENT RECORDS/INVENTORY POLICY AND PROCEDURE

PURPOSE

To maintain accurate inventory and property records for items purchased with restricted funds.

POLICY

- I. Promontory School will maintain an inventory report for all items purchased under Federal award. The inventory report will be updated when new items are purchased, and a record of final disposition will be maintained.
- II. A biennial physical inventory of the property will be taken.
- III. The property will be maintained as needed.

PURPOSE

Protect school assets, ensure compliance with federal grant requirements, and maintain accurate records of all equipment and technology owned by Promontory.

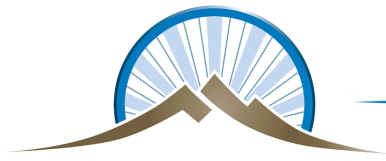
Inventory Requirements

Track:

- Description
- Serial number
- Asset tag
- Funding source
- Purchase date
- Cost
- Location
- Assigned employee
- Condition
- Disposition date

Equipment Threshold

Define equipment according to federal grant requirements (currently generally \$5,000+ unless a grant specifies otherwise), while allowing Promontory to track lower-value technology assets such as:



- Chromebooks
- Laptops
- iPads
- Projectors
- Smart boards
- Radios
- Cameras

Physical Inventory

- Conduct a full inventory every year.
- Conduct annual technology verification.
- Investigate discrepancies immediately.
- Report losses or theft to administration.

Employee Responsibilities

Employees assigned school equipment shall:

- Use equipment for school purposes.
- Protect against damage or theft.
- Report lost, damaged, or stolen items.
- Return equipment upon separation.

Disposal Procedures

Before disposal:

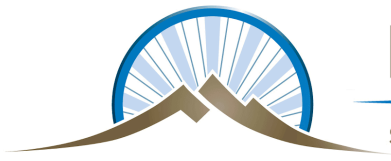
- Verify funding restrictions.
- Remove student data.
- Document disposition.
- Obtain administrative approval.

Federal Compliance

Maintain records required under 2 CFR 200.313 and all applicable federal grant requirements.

Administrative Responsibility

The Director or designee shall maintain inventory records and provide documentation during audits.



PROMONTORY EQUAL OPPORTUNITY IN EDUCATION POLICY

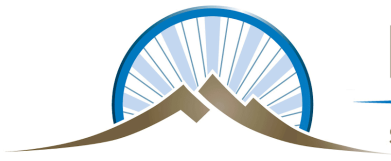
In accordance with Utah state rule R277-328 and the Utah Constitution Article X section 3, Promontory School shall provide standards for educators regarding professional learning and guidelines and requirements for curriculum, and classroom instruction on equal opportunity in education.

DEFINITIONS

1. "Classroom instruction" means any course material, unit, class, lesson, activity, or presentation that, as the focus of the discussion, provides instruction or information to a student.
2. "Curriculum" means primary instructional materials that have been approved pursuant to R277-468 and 53E-4-202.
3. "Equal opportunity in education" means acknowledging that all students are capable of learning and distributing resources to provide equal opportunities based upon the needs of each individual student.
4. "Inclusion" means
 - a. the practice of ensuring students feel a sense of belonging and support within the school community; and
 - b. to the maximum extent appropriate, for students with disabilities, providing access to general curriculum and engagement in regular education classes with peers without disabilities as described in Rule R277-750.

Professional Learning Regarding Equal Opportunities in Education and Prohibited Discriminatory Practices.:

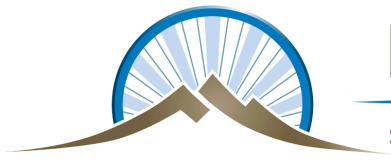
1. In accordance with rule R277-328-3, Promontory School will provide professional learning opportunities to teachers and staff regarding equal opportunity in education.
2. The professional learning described in Subsection (1) shall include instruction in:
 - a. fostering a learning environment which is safe, conducive to the learning process, and free from unnecessary disruption as consistent with Section 53G-8-202;
 - b. identifying students in need of additional academic supports;
 - c. implementing principles and strategies of inclusion so that:
 - i. a student with a disability is educated with peers without a disability to the maximum extent appropriate, consistent with IDEA; and
 - ii. specially designed instruction is provided in addition to, not instead of, high quality core instruction as consistent with IDEA;
 - d. recognizing the constitutionally protected rights of all students; and



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- e. recognizing the constitutionally protected rights of all students; and
 - f. developing strategies to promote the examination of various viewpoints on a topic in an impartial and politically neutral manner.
3. The professional learning provided by Promontory School shall include instruction that educators may not promote prohibited discriminatory practices as described in Section 53B-1-118:
- a. one personal identity characteristic is inherently superior or inferior to another personal identity characteristic;
 - b. an individual, by virtue of the individual's personal identity characteristics, is inherently privileged, oppressed, racist, sexist, oppressive, or a victim, whether consciously or unconsciously;
 - c. an individual should be discriminated against in violation of Titles VI & VII of the Civil Rights Act of 1964, IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973, receive adverse treatment, be advanced, or receive beneficial treatment because of the individual's personal identity characteristics;
 - d. an individual's moral character is determined by the individual's personal identity characteristics;
 - e. an individual, by virtue of the individual's personal identity characteristics, bears responsibility for actions committed in the past by other individuals with the same personal identity characteristics;
 - f. an individual should feel discomfort, guilt, anguish, or other psychological distress solely because of the individual's personal identity characteristics;
 - g. asserts that meritocracy is inherently racist or sexist;
 - h. asserts that socio-political structures are inherently a series of power relationships and struggles among racial groups;
 - i. promotes resentment between, or resentment of, individuals by virtue of their personal identity characteristics;
 - j. ascribes values, morals, or ethical codes, privileges, or beliefs to an individual because of the individual's race, color, ethnicity, sex, sexual orientation, national origin, or gender identity;
 - k. is referred to or named diversity, equity, and inclusion, used in conjunction; or
 - l. includes or relates to, a prohibited submission as outlined in Section 67-27- 105.
4. Prohibited instruction does not include a training on policies or procedures required by state or federal law, including laws relating to prohibited discrimination or harassment.
5. The professional learning provided by Promontory School shall be done in accordance with all state and federal laws.
6. The content of professional learning provided by an Promontory School shall be made freely available by the Promontory School to parents with a student in the Promontory School within a reasonable amount of time from when the training is offered upon request and include a copy of this rule.



7. If an alleged violation of this section is reported to the Board as described in Rule R277-123, the Board may investigate the alleged violation as described in Rule R277-114, including taking action as described in Subsection R277-114-3(3).
8. Promontory School shall ensure a formal complaint process is in place pursuant to Rule R277-113.
9. The professional learning referred to in Subsection (6) does not include remediation sessions for a specific educator.

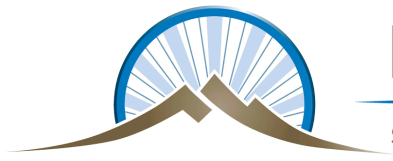
Educational Opportunities Within an LEA

1. In accordance with rule R277-328-4, No part of this rule shall be construed by any staff or board member to:
 - a. prohibit or ban discussions of events, ideas, attitudes, beliefs, or concepts, including those described in this rule, from the general sharing and participation in the marketplace of ideas fostered in a learning environment; and
 - b. promote one ideology over another regarding a topic, including those described in this rule.
2. The director may turn to the Promontory School Board for technical assistance regarding the implementation of this rule.
3. The administration of Promontory School shall establish, in cooperation with the Promontory School Board, a model for professional learning that complies with the requirements of this rule including approval of the model in an open and public meeting of the Board and making the model available on the Utah State Board of Education's website.
4. The requirement for approval described in Subsection (3) applies only to the professional learning model referenced in this rule and does not apply to other professional learning with embedded components of equal opportunity in education offered by the director or board as long as the professional learning does not contain concepts described in Subsection R277-328-3(3).

LANGUAGE ACCESS

Promontory School is committed to providing meaningful access to educational programs, services, activities, and important communications for students and parents who have limited English proficiency (LEP).

In accordance with Title VI of the Civil Rights Act of 1964 and applicable state and federal requirements, Promontory School shall take reasonable steps to ensure that language is not a barrier to participation in



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educational opportunities.

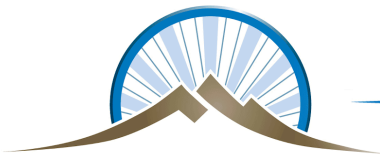
Promontory School may provide language assistance services, as appropriate, including:

- Translation of critical school communications.
- Interpretation services for meetings, conferences, and school events when reasonably available.
- Assistance in communicating information related to student enrollment, academic progress, attendance, discipline, special education, health and safety matters, and other significant educational topics.

Employees shall not deny participation in school programs, activities, services, or communications based on a student's or parent's limited English proficiency.

Requests for language assistance should be directed to school administration. The School Director or designee shall be responsible for coordinating language access services and ensuring compliance with applicable laws and regulations.

Tab 1



EMPLOYMENT OF RELATIVES POLICY

DEFINITIONS

“Relative” means a father, mother, husband, wife, son, daughter, sister, brother, mother-in law, father-in-law, brother-in-law, sister-in-law, son-in-law, or daughter-in-law.

“Appointee” means an employee whose salary, wages, pay, or compensation is paid from school funds.

“School officer” means a person who holds a position that is compensated by school funds; or who holds a position on the Promontory School of Expeditionary Learning Board of Trustees.

POLICY

No school officer may employ, appoint, vote for or recommend the appointment of a relative in or to any position of employment, when the appointee will be directly supervised by a relative, except as follows:

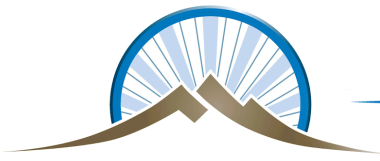
1. the appointee will be employed for a period of 12 weeks or less;
2. the appointee is a volunteer;
3. the appointee is the only person available, qualified, or eligible for the position; or
4. the Promontory School of Expeditionary Learning Board of Trustees determines that the school officer is the only person available or best qualified to perform supervisory functions for the appointee.

No school officer may directly supervise an appointee who is a relative, except as follows:

1. the relative was appointed or employed before the school officer assumed his position, if the relative's appointment did not violate the provisions of this policy in effect at the time of his appointment;
2. the appointee will be employed for a period of 12 weeks or less;
3. the appointee is a volunteer;
4. the appointee is the only person available, qualified, or eligible for the position; or
5. the Promontory School of Expeditionary Learning Board of Trustees determines that the public officer is the only person available or best qualified to perform supervisory functions for the appointee.

No appointee may accept or retain employment if he is under the direct supervision of a relative, except as follows:

1. the relative was appointed or employed before the school officer assumed his position, if the relative's appointment did not violate the provisions of this policy in effect at the time of his appointment;
2. the appointee is the only person available, qualified, or eligible for the position;



3. the appointee is employed for a period of 12 weeks or less;
4. the appointee is a volunteer; or
5. the Promontory School of Expeditionary Learning Board of Trustees determines that the appointee's relative is the only person available or best qualified to supervise the appointee.

When a school officer supervises a relative as allowed above, the officer shall make a complete written disclosure of the relationship to the Promontory School of Expeditionary Learning Board of Trustees and the school officer who exercises authority over a relative may not evaluate the relative's job performance or recommend salary increases for the relative.

The school board of Promontory School of Expeditionary Learning reserves the right to consider other employees within this policy based on personal relationships (friend, roommate, boyfriend, girlfriend, etc.)

GOVERNING BOARD CONFLICT OF INTEREST POLICY

~~As per the Promontory School of Expeditionary Learning Board of Trustees Bylaws:~~

Section 6.5 Conflicts of Interest. If any person who is a trustee or officer of the corporation is aware that the corporation is about to enter into any business transaction directly or indirectly with himself, any member of his family, or any entity in which he has any legal, equitable or fiduciary interest or position, including without limitation as a trustee, officer, shareholder, partner, beneficiary or trustee, such person shall:

- A. immediately inform those charged with approving the transaction on behalf of the corporation of his interest or position,
- B. aid the persons charged with making the decision by disclosing any material facts within his knowledge that bear on the advisability of such transaction from the standpoint of the corporation, and
- C. not be entitled to vote on the decision to enter into such transaction.

Tab 2



EMPLOYMENT OF RELATIVES AND CONFLICT OF INTEREST POLICY

PURPOSE

Promontory School of Expeditionary Learning recognizes that family and personal relationships may exist within the school community. The purpose of this policy is to ensure employment decisions are based on qualifications, maintain public trust, prevent conflicts of interest, and ensure fair and impartial supervision, evaluation, compensation, and employment practices.

This policy is intended to comply with Utah Code §52-3-1 through §52-3-4, applicable charter school governance requirements, and Promontory School policies regarding ethics and conflicts of interest.

DEFINITIONS

Relative: "Relative" includes:

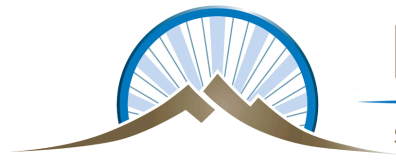
- Spouse
- Parent
- Child
- Sibling
- Grandparent
- Grandchild
- Stepparent
- Stepchild
- Stepsibling
- Mother-in-law
- Father-in-law
- Son-in-law
- Daughter-in-law
- Brother-in-law
- Sister-in-law
- Any individual residing in the same household

Personal Relationship: A relationship that may reasonably create a conflict of interest, including:

- Romantic relationships
- Domestic partnerships
- Cohabitation
- Significant personal or financial relationships

School Official: Any employee, administrator, supervisor, director, or member of the Board of Trustees who participates in hiring, supervision, evaluation, discipline, compensation, promotion, or employment decisions.

POLICY



Employment of Relatives

Promontory School does not prohibit the employment of relatives. However, relatives may not participate in employment decisions that create an actual or perceived conflict of interest.

No employee, administrator, or board member may:

- Hire a relative without following disclosure procedures;
- Participate in interviewing, selection, or appointment decisions involving a relative;
- Directly supervise a relative unless specifically approved under this policy;
- Evaluate a relative's performance;
- Recommend disciplinary action, promotion, salary adjustments, or contract status for a relative.

Direct Supervision

Whenever reasonably possible, employees shall not directly supervise a relative. Direct supervision includes authority over:

- Evaluations
- Performance improvement plans
- Discipline
- Hiring recommendations
- Contract recommendations
- Salary recommendations
- Work assignments
- Leave approval

If a relative is employed by the school, an alternate supervisory structure shall be established whenever practical.

Exceptions

The Board of Trustees may approve an exception when:

1. The employee is the only qualified applicant available;
2. The employee possesses specialized qualifications necessary for the position;
3. The school would experience hardship in filling the position;
4. The relationship existed before either individual assumed a supervisory role;
5. The Board determines that adequate safeguards exist to eliminate conflicts of interest.

Any exception shall be documented in Board meeting minutes.



Required Disclosure

Employees, administrators, and board members shall disclose any family or personal relationship that could reasonably create a conflict of interest.

Disclosure shall occur:

- At the time of application;
- When a relationship develops after employment;
- Before participating in any employment decision involving a relative or personal associate.

Failure to disclose a conflict may result in disciplinary action.

Recusal Requirements

Any employee, administrator, or board member with a conflict of interest shall immediately recuse themselves from:

- Hiring decisions
- Employment recommendations
- Evaluations
- Contract decisions
- Salary decisions
- Disciplinary proceedings
- Grievance investigations

The recusal shall be documented when appropriate.

Hiring Procedures

An employee, administrator, or board member with a personal or family relationship to an applicant shall:

1. Disclose the relationship before participating in the hiring process;
2. Recuse themselves from interviews, candidate scoring, and hiring recommendations;
3. Refrain from influencing hiring decisions.

All hiring decisions shall be documented and based upon established hiring criteria.

Board Member Employment Relationships



A member of the Board of Trustees shall disclose any employment relationship involving:

- The board member;
- A relative of the board member; or
- A business entity in which the board member has a financial interest.

The board member shall abstain from discussion and voting on matters involving the conflict.

Board approval shall be required for employment arrangements involving immediate family members of board members.

Personal Relationships in the Workplace

Employees who enter into a romantic or domestic relationship where one employee supervises, evaluates, or influences employment decisions affecting the other employee shall immediately notify the Director.

The school may reassign supervisory responsibilities or make other adjustments to eliminate conflicts of interest.

Volunteers, Student Teachers, and Practicum Students

This policy applies to:

- Volunteers
- Fieldwork chaperones
- Student teachers
- Practicum students
- Interns

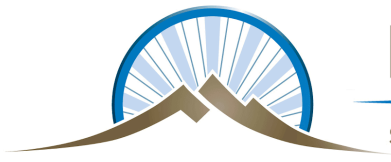
School employees shall not use their position to secure volunteer placements, assignments, or opportunities for relatives outside established school procedures.

Conflict of Interest Disclosure

All administrators and Board members shall complete an annual Conflict of Interest Disclosure Form.

Employees shall disclose any actual or potential conflict of interest that may affect:

- Employment decisions
- Purchasing decisions



- Contracting decisions
- Student placement decisions
- Compensation decisions

Failure to disclose a known conflict of interest may result in disciplinary action

Documentation

The school shall maintain records of:

- Conflict disclosures;
- Recusal statements;
- Board-approved exceptions;
- Alternative supervisory arrangements.

These records shall be maintained in accordance with applicable personnel and records retention requirements.

Administrative Authority

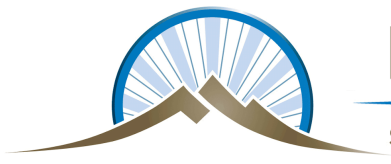
The Director shall implement this policy and establish procedures necessary to prevent conflicts of interest and ensure compliance with state law.

The Board of Trustees reserves the right to review any employment relationship that may create an actual or perceived conflict of interest and may require corrective action when necessary.

Non-Retaliation

Employees who disclose conflicts of interest in good faith shall not be retaliated against for making such disclosures.

Updated Policy



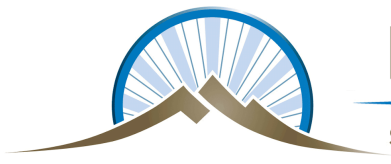
MODEL BULLYING POLICY LANGUAGE

PURPOSE AND PHILOSOPHY

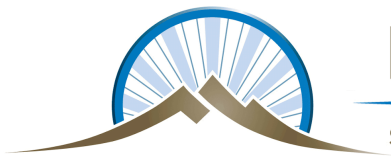
Bullying, cyber-bullying, hazing, retaliation, and abusive conduct towards students and employees violates state law and local policy. Bullying on the basis of a protected class violates federal civil rights laws. The purpose of this policy is to prohibit bullying, cyber-bullying, hazing, retaliation, and abusive conduct involving Promontory's students and employees. Promontory's Board has determined that a safe learning environment in which all members of the school community are treated with dignity and respect is necessary for students to learn and achieve high academic standards and that conduct constituting bullying, cyber-bullying, hazing, retaliation, and abusive conduct disrupts both a student's ability to learn and Promontory's ability to educate its students in a safe environment.

DEFINITIONS

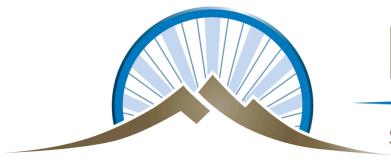
1. **"Abusive conduct"** means verbal, nonverbal, or physical conduct of a parent or student directed toward a school employee that, based on its severity, nature, and frequency of occurrence, a reasonable person would determine is intended to cause intimidation, humiliation, or unwarranted distress. A single act does not constitute abusive conduct.
2. **"Accountability practice"** means any evidence-based practice that increases academic outcomes and decreases behavior that disrupts the learning environment and holds students accountable for their actions by requiring them to take responsibility to repair harm and provide restitution when appropriate.
 - a. Some practices include adapting instruction to increase behavior engagement plans, and restorative practices.
3. **"Action plan"** means a process to address an incident of bullying, cyber bullying, hazing, or retaliation.
4. **"Allegation"** means a claim or assertion that someone has engaged in a reported incident that has not been verified by a formal process.
5. **"Bullying"** means student bullying and staff bullying.
6. **"Civil rights violation"** means violations as outlined in the following federal laws:
 - a. Title VI of the Civil Rights Act of 1964;
 - b. Title IX of the Education Amendments of 1972;
 - c. Section 504 of the Rehabilitation Act of 1973; or
 - d. Title II of the Americans with Disabilities Act of 1990



7. **“Cyber-bullying”** means using the Internet, a cell phone, or another device to send or post text, video, or an image with the intent or knowledge, or with reckless disregard, that the text, video, or image will hurt, embarrass, or threaten an individual, regardless of whether the individual directed, consented to, or acquiesced in the conduct, or voluntarily accessed the electronic communication.
8. **“Hazing”** means a school employee or student intentionally, knowingly, or recklessly committing an act or causing another individual to commit an act toward a school employee or student that:
 - a. Endangers the mental or physical health or safety of a school employee or student;
 - i. Involves any brutality of a physical nature, including whipping, beating, branding, calisthenics, bruising, electric shocking, placing of a harmful substance on the body, or exposure to the elements;
 - ii. Involves consumption of any food, alcoholic product, drug, or other substance or other physical activity that endangers the mental or physical health and safety of a school employee or student; or
 - iii. Involves any activity that would subject a school employee or student to extreme mental stress, such as sleep deprivation, extended isolation from social contact, or conduct that subjects a school employee or student to extreme embarrassment, shame, or humiliation; and
 - b. Is committed for the purpose of initiation into, admission into, affiliation with, holding office in, or as a condition for in a school or school sponsored team, organization, program, club, or event; or
 - i. Is directed toward a school employee or student whom the individual who commits the act knows, at the time the act is committed, is a member of, or candidate for membership in, a school or school sponsored team, organization, program, club, or event in which the individual who commits the act also participates.
 - c. The conduct described in this Subsection constitutes hazing, regardless of whether the person against whom the conduct is committed directed, consented to, or acquiesced in, the conduct.
9. **“Incident”** means a verified incident of bullying, cyber-bullying, hazing, or retaliation.
10. **“LEA Designee”** means a designated individual at the LEA level who can provide training to investigators, oversee implementation of any action plan, monitor implementation, assist with school case-specific needs, and act as a liaison to the state board regarding bullying, cyber-bullying, hazing, abusive conduct.
11. **“Parent”** means a parent or legal guardian.



12. **“Restorative justice practice”** means a discipline practice that brings together students, school personnel, families, and community members to resolve conflicts, address disruptive behaviors, promote positive relationships, and healing.
13. **“Retaliate”** or **“retaliation”** means an act or communication intended:
 - a. As retribution against a person for reporting bullying, cyber-bullying, or hazing; or
 - b. To improperly influence the investigation of, or the response to, a report of bullying or hazing.
14. **“School”** means a public elementary or secondary school, including a charter school.
15. **“School board”** means:
 - a. A local school board; or
 - b. A charter school governing board.
16. **“School designee”** means a school administrator or designee assigned to receive and investigate allegations at that school, notify parents and/or persons involved, and oversee action plans.
17. **“School employee”** means an individual working in the individual’s official capacity as:
 - a. A school teacher;
 - b. A school staff member;
 - c. An administrator; or
 - d. An individual who is employed, directly or indirectly, by a school, school board, or school district, or who works on a school campus.
18. **“School grounds”** means a school building; property on which a school building or facility is located; and property that is owned, leased or used by a school for a school-sponsored activity, function, program, instruction or training.
 - a. “School grounds” also includes school-related transportation vehicles.
19. **“School-sponsored activity”** means an activity, fundraising event, club, camp, clinic, or other event or activity that is authorized by a specific public school, according to local school board policy, and satisfies at least one of the following conditions:
 - a. The activity is managed or supervised by a school board, school, or public school employee;
 - b. The activity uses the school district or public school facilities, equipment, or other school resources; or
 - c. The activity is supported or subsidized, more than inconsequentially, by public funds, including the public school's activity funds or Minimum School Program dollars.
 - d. The activity includes preparation for and involvement in a public performance, contest, athletic competition, demonstration, display, or club activity.

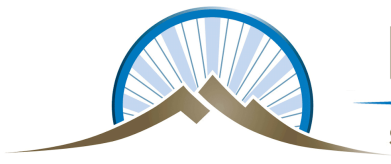


20. **“Staff bullying”** means a school employee, with the intent to cause harm, repeatedly committing a written, verbal, or physical act against a student or another school employee, or engaging in a single egregious act toward another employee involving an imbalance of power, that:
- Creates an environment that a reasonable person would find hostile, threatening, or humiliating; and
 - Substantially interferes with a student's or employee's educational or professional performance, opportunities, or benefits.
 - "Staff bullying" does not mean instances of:
 - Ordinary teasing, horseplay, argument, or peer conflict;
 - Reasonable correction of behavior by a school employee; or
 - Reasonable coaching strategies and techniques by a school employee who is a coach.
21. **“Student bullying”** means one or more students, with the intent to cause harm, repeatedly committing a written, verbal, or physical act against another student, or engaging in a single egregious act toward another student involving an imbalance of power, that:
- Creates an environment that a reasonable person would find hostile; and
 - Interferes with a student's educational performance, opportunities, or benefits.
 - "Student bullying" does not mean instances of:
 - Ordinary teasing, horseplay, argument, or peer conflict;
 - Reasonable correction of behavior by a school employee; or
 - Reasonable coaching strategies and techniques by a school employee who is a coach.
22. **“Verification”** means that an alleged incident has been found to be substantiated through a formal investigation process.
23. **“Volunteer”** means a non-employee with significant, unsupervised access to students in connection with a school assignment.

See Utah Code Ann. Section 53G-9-601; see also Utah Administrative Rule R277-613.

PROHIBITIONS

- Bullying Prohibited: A school employee or student shall not engage in bullying a school employee or student:
 - On school property;
 - At a school-sponsored activity;



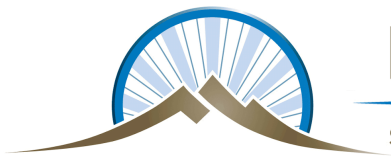
- c. On a school bus;
 - d. At a school bus stop; or
 - e. While the school employee or student is traveling to or from a location or event described above in Subsection 1(a) – (d).
2. Hazing and Cyber-bullying Prohibited: A school employee or student shall not engage in hazing or cyber-bullying a school employee or student at any time or in any location.
 3. Retaliation Prohibited: A school employee or student shall not engage in retaliation against:
 - a. A school employee;
 - b. A student; or
 - c. An investigator for, or witness of, an alleged incident of bullying, cyber-bullying, hazing, or retaliation.
 4. False Allegations Prohibited: A school employee or student shall not make a false allegation of bullying, cyber-bullying, hazing, or retaliation against a school employee or student.
 5. Abusive Conduct Prohibited: No student or parent shall engage in abusive conduct.

ADDITIONAL PROHIBITIONS

6. Any bullying, cyber-bullying, or hazing that is found to be targeted at a federally protected class is further prohibited under federal anti discrimination laws and is subject to compliance regulations from the United States Department of Education, Office for Civil Rights (OCR).
7. A student shall not share a recording of an act of bullying, cyber-bullying, hazing, abusive conduct, or retaliation, in order to impact or encourage future incidents.
 - a. This restriction does not prevent a student from sharing a recording of an incident or of abusive conduct with a teacher or administrator as part of reporting the incident of abusive conduct or in response to a request from a teacher or administrator for the recording.
8. A school employee or student shall not create or distribute sexually explicit or nonconsensual intimate images.

RESPONSES TO PROHIBITED ACTIONS

If, after an investigation, a student is found to be in violation of this policy by participating in or encouraging conduct prohibited by this policy, the student shall be disciplined by appropriate measures up to, and including, suspension and expulsion, pursuant to Utah Code § 53G-8-205



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and school policy, removal from participation in school activities, and/or discipline in accordance with regulations of the U.S. Department of Education Office for Civil Rights (OCR).

If, after an investigation, a school employee is found to be in violation of this policy, the employee shall be disciplined by appropriate measures, which may include termination, reassignment, or other appropriate action.

In determining the appropriate response to students who have been found to have engaged in a verified incident, the following factors should be considered:

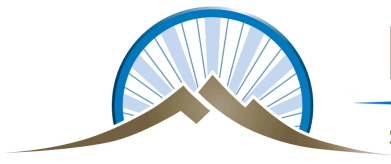
1. The development and maturity levels of the parties involved;
2. The impact of harm;
3. The surrounding circumstances;
4. Past incidences or past continuing patterns of behavior;
5. The relationships between the parties involved;
6. The level of disruption in or interference with the orderly operation of the school.

INITIAL STEPS FOR COMPLAINANTS

1. If it is safe, individuals are encouraged to confront the alleged offender, tell them the conduct is unwelcome, and avoid further contact if possible.
2. Complainants should document the incident, including the time, date, location, what was said or done, and any other relevant circumstances.
3. If the issue is not resolved through direct discussion, if confronting the alleged offender is unsafe, or if the misconduct is severe, the complainant should take steps to report the misconduct to the appropriate personnel.

REPORTING

Students who have been subjected to or witnessed bullying, cyber-bullying, hazing, or retaliation, and students who have witnessed abusive conduct, are strongly encouraged to promptly report such incidents to any school employee. Students, parents/guardians/families, and school staff are encouraged to submit written complaints to ensure the school administrator is adequately informed of all details relevant to the complaint. Complaints may also be submitted through the SafeUT application or the Public Education Hotline.



School employees who receive reports of such incidents must report them to the school designee:

- Complaints should be submitted to the Director or their designee.
- If the complaint is against the Director or a Governing Board member, it should be submitted to the Executive Committee of the Governing Board.
- Complaints that do not involve the school or do not affect the school environment should be directed to the appropriate authorities, including law enforcement or child protective services.

In connection with a report of an alleged incident, students and school employees who report incidents may request that their identity be kept anonymous, and reasonable steps shall be taken by the school designee and others involved in the reporting and investigation to maintain the anonymity of such individuals, if possible.

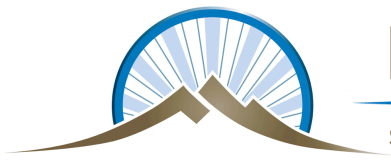
All complainants who file a report are entitled to protection from retaliation. Any reprisal against someone reporting or participating in an investigation in good faith is strictly prohibited. Retaliatory conduct will be treated as a violation of this policy and may result in disciplinary action and/or referral to appropriate law enforcement agencies.

INVESTIGATION

Not all unacceptable behavior rises to the level of bullying, cyberbullying, hazing, and/or retaliation; typically, the behavior must be severe and/or widespread to be considered under this policy. Upon receiving a complaint, the Director or their designee will determine:

1. Whether the report is within the school's oversight or jurisdiction to address, and
2. Whether the reported behavior could reasonably constitute misconduct under this policy.

If the report does not meet the criteria, no further investigation under this policy is required, though the behavior may still be addressed under other applicable school policies if applicable.



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Administration may take separation efforts, protective action, or disciplinary action before, during, and/or after the reporting and investigation process. If, at any point during the investigation, administration determines the incident exceeds the school's oversight, indicates serious safety concerns, or may involve criminal activity, the investigation may be referred to law enforcement.

The school or LEA Designee shall report to the U.S. Department of Education, Office for Civil Rights (OCR) all acts of bullying, hazing, cyber-bullying, abusive conduct, or retaliation that the individual reasonably determines may be violations of a student's or employee's civil rights.

~~Students, parents/guardians/families, and school staff are encouraged to submit written complaints to ensure the school administrator is adequately informed of all details relevant to the complaint.~~

~~Complaints may also be submitted through the SafeUT application or the Public Education Hotline.~~

School employees must implement preventative measures to protect students from retaliation, including assisting students who are targeted by incidents and the student's parent(s) in reporting subsequent problems and new incidents. The school designee will promptly investigate each complaint of bullying in a thorough and confidential manner, including, to the extent possible, anonymous reports, and shall administer appropriate discipline to all individuals who violate this policy. Formal disciplinary action is prohibited based solely on an anonymous report.

At a minimum, an investigation shall include interviewing the alleged targeted individual and the alleged perpetrator to have engaged in a manner in violation of this policy. The School designee may also interview other individuals who may provide additional information, including the parents of the alleged targeted individual and alleged perpetrator, any witnesses to the conduct, and school staff. The School designee may also review physical evidence, including but not limited to video or audio recordings, notes, email, text messages, social media, and graffiti. The School designee shall inform any person being interviewed that the School designee is required to keep the details of the interview confidential to the extent allowed by law and that further reports of bullying will become part of the investigation. The School designee shall keep a written record of the date and time they interviewed individuals, which individuals they interviewed, unless the individual requests to remain anonymous, physical evidence they had reviewed and the manner in which it was reviewed.

If a school employee, agent, or school resource officer believes a student is at-risk of harming themselves or others, the school employee, agent, or school resource officer may intervene



and ask a student questions regarding the student's thoughts of harming self or others for the purposes of referring the student to appropriate prevention services and informing the student's parent.

Promontory's shall establish and post:

1. Procedures allowing for anonymous or in-person reporting of bullying, cyber bullying, hazing, retaliation, or abusive conduct; and
2. The name and position of the School Designee to receive reports. Each reported complaint should include:
 - a. ~~1.~~ Name of the complaining party, unless anonymous;
 - b. ~~2.~~ Name of the alleged targeted individual;
 - c. ~~3.~~ Name of the alleged perpetrator, if known;
 - d. ~~4.~~ Date and location of incident(s); and
 - e. ~~5.~~ A statement describing the incident(s), including the names of any witnesses.

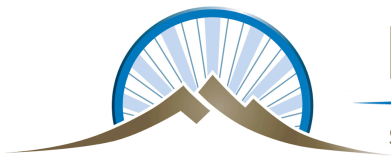
All information received in the complaint, including the name of the complainant, shall be treated with the utmost confidence to the extent possible. Administrators shall notify the complainant before revealing the complainant's name, unless anonymous. It is Promontory's policy, in compliance with state and federal law, that students have a limited expectation of privacy on Promontory's computer equipment and network system, and routine monitoring or maintenance may lead to discovery that a user has engaged in prohibited conduct. Also, individual targeted searches under this policy will be conducted if there is reasonable suspicion that a user has violated this policy. Personal electronic devices of any student suspected of violation of this policy may be confiscated for investigation and may be turned over to law enforcement.

PARENT NOTIFICATION AND DOCUMENTATION

The School Designee (or their designee) must notify parents that their student was involved in an incident of bullying, cyberbullying, hazing, abusive conduct, or retaliation, including incidents when a student expresses suicidal ideation. Timeliness of notification may vary depending on the circumstances of an incident.

If a School Designee and/or school employee believes that a situation exists which presents a serious threat to the well-being of a student, that School Designee (or their designee), and/or school employee shall notify the student's parent without delay, before the end of the school day.

The School Designee (or their designee), and/or school employee will notify the student's



parent by:

1. Calling the parent and sending a follow-up email. This is the preferred method for delivering this notification.
2. Calling the parent and leaving a voicemail if they are unable to connect telephonically, and send a follow-up email.

The school administrator who notifies parents under this section shall keep an incident report which includes a record verifying that notification was provided to the parents/guardians/families of each student involved.

The administrator's record of notification must include the date and time of notification, manner of notification (phone call, in-person meeting, etc.), and an indication of the type of incident. The incident report may be disclosed to the parents/guardians and/or students involved, but it may not be disclosed to any other person or entity except when required by a valid court order as provided in Utah Code.

The school will retain the record for at least as long as the student is enrolled at the school and will provide or expunge the record in accordance with Utah Code § 53G 9-604.

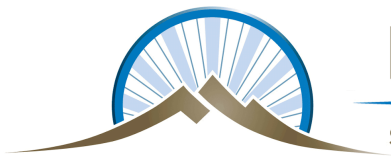
In addition to notifying the parent or guardian as set forth above, the School Designee will provide the parent or guardian with the following:

1. suicide prevention materials and information as recommended by the Utah State Board of Education in accordance with Utah Code § 53G-9-604(2)(b);
2. information on ways to limit a student's access to fatal means, including firearms or medication; and
3. information and resources on the healthy use of social media and online practices as provided in R277-613.

Following the investigation of an incident, an LEA shall follow up with the parents of all parties to:

1. Inform parents of the outcome when an investigation is concluded;
2. Provide additional information about the investigation or the resolution consistent with the Family Educational Rights and Privacy Act of 1974, 20 U.S.C. 1232g; and
3. Inform parents of appeal options if the parents disagree with resolution of the investigation.

If an incident is verified, the school will inform parents what safety measures will be in place for their child and regularly update the parents regarding implementation of an action plan.



LEA ACTION PLAN

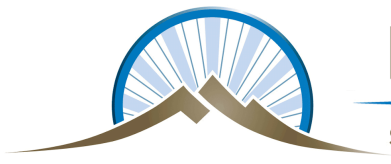
Verified violations of the prohibitions noted previously may result in:

1. A discipline plan consistent with State Board of Education Administrative Rule R277-609.
2. Use of restorative justice practices consistent with State Board of Education Administrative Rule R277-613;
 - a. A student to whom an incident is directed, is not required to participate in a restorative justice practice with an individual who is alleged to have engaged in an incident. If the school designee would like a student to participate in a restorative justice practice, the school designee shall notify the student's parent of the restorative justice practice and obtain consent from the student's parent before including the student in the process.
3. Use of accountability practices;
4. The provision of supportive services designed to preserve the student's access to educational opportunities and a sense of safety.
5. Other actions against student or employee as appropriate.

Verified violations of prohibitions will result in the incident being documented in the file of the student who caused the incident.

Additionally, an LEA shall create an action plan for verified incidents. An action plan shall include:

1. A communication plan designed to keep each parent updated on the implementation of the action plan;
2. With respect to the student to whom the incident was directed and in direct coordination with the student's parent:
 - a. A tailored response to the incident that addresses the student's needs;
 - b. A mechanism to consider consequences or accommodations the student may need regarding decreased exposure or interactions with the student who caused the incident;
 - c. Notification of the consequences and plan to address the behavior of the student who caused the incident;
 - d. Supportive measures designed to preserve the student's access to educational services and opportunities; and
 - e. To the extent available, access to other resources the parent requests for the student; and
3. With respect to the student who caused the incident and in direct coordination with the



student's parent:

- a. A range of tailored and appropriate consequences, making reasonable effort to preserve the student's access to educational services and activities;
- b. A process to determine and provide any needed resources related to the underlying cause of the incident;
- c. Supportive measures designed to preserve the student's access to educational services and opportunities while protecting the safety and well-being of other students; and
- d. A process to remove the student from school in an emergency situation, including a description of what constitutes an emergency.

An action plan may not include a requirement that the student to whom the incident was directed change the student's:

1. Educational schedule or placement; or
2. Participation in a school sponsored sport, club, or activity.

The Director or his/her designee will produce and maintain a record that tracks implementation of the action plan addressing the incident, if applicable.

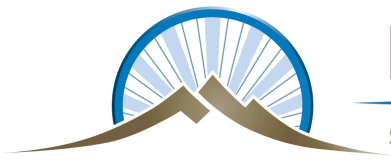
If, after the school attempts to involve a parent in the development and implementation of an action plan, the parent chooses not to participate in the process, the school may develop and implement an action plan without the parent's involvement.

Action plans must also include, as appropriate:

1. Prompt reporting to law enforcement of all acts of bullying, cyber-bullying, hazing, or retaliation that constitute suspected criminal activity;
2. Procedures for a fair and timely opportunity for the accused to explain the accusations and defend his/her actions prior to student or employee discipline; and
3. Procedures for providing due process in the investigation and findings through the investigation.

APPEALS

Investigative procedures conducted under this policy may be appealed by both complainants and alleged perpetrators as provided in this subsection in accordance with the Promontory's grievance process. The purpose of an appeal is to determine whether the investigative procedures outlined in this policy were followed. An appeal may also be filed to introduce new evidence not available during the investigation. If an appeal does not introduce new evidence or



allege a violation of the investigative procedures of this policy, it will be denied. Disagreement with the outcome of an investigation or with an investigator's interpretation of the facts is not grounds for an appeal under this policy.

TRAINING AND EDUCATION

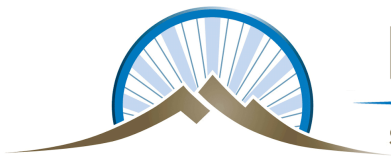
Promontory will ensure that students, employees, coaches, and volunteers receive training on bullying, cyber-bullying, hazing, retaliation, and abusive conduct from individuals qualified to provide such training. The training shall meet the standards established by the Utah State Board of Education's rules and include information on:

1. Bullying, cyber-bullying, hazing, abusive conduct, and retaliation;
2. Discrimination under the following federal laws:
 - a. ~~i.~~ Title VI of the Civil Rights Act of 1964;
 - b. ~~ii.~~ Title IX of the Education Amendments of 1972;
 - c. ~~iii.~~ Section 504 of the Rehabilitation Act of 1973; and
 - d. ~~iv.~~ Title II of the Americans with Disabilities Act of 1990;
3. How bullying, cyber-bullying, hazing, retaliation, and abusive conduct are different from discrimination and may occur separately from each other or in combination;
4. How bullying, cyber-bullying, hazing, retaliation, and abusive conduct are prohibited based upon race, color, national origin, sex, religion, or disability.
5. The right of free speech and how it differs for students, employees, and parents or guardians.
6. Safe digital citizenship.

The training will also complement the suicide prevention program required for students under R277-620 and the suicide prevention training required for licensed educators consistent with Utah Code Ann. Section 53G-9-704(1), and also include information on when issues relating to R277-613 may lead to student or employee discipline.

The training shall be offered to:

1. New school employees, coaches, and volunteers within the first year of employment or service;
2. All school employees, coaches, and volunteers at least once every three years after the initial training; and
3. All students (regardless of whether they are involved in athletics or extracurricular activities or clubs) at a frequency determined by the LEA designee.



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In addition to the training requirements described above, any student, employee, or volunteer coach participating in a school sponsored athletic program, both curricular and extracurricular, or extracurricular club or activity, shall, prior to participating in the athletic program or activity, participate in bullying, cyber bullying, hazing, retaliation, and abusive conduct prevention training. This training shall be offered to new participants on an annual basis and to all participants at least once every three years. Promontory will inform student athletes and extracurricular club members of prohibited activities under R277-613 and potential consequences for violation of the law and the rule.

Promontory will maintain training participant lists or signatures, the date of the provided training, and provide the participant lists or signatures to the Utah State Board of Education upon request.

ASSESSMENT

The Promontory's designee will assess the prevalence of bullying, cyber-bullying, and hazing in the school, specifically locations where students are unsafe and additional adult supervision may be required, such as playgrounds, hallways, and lunch areas.

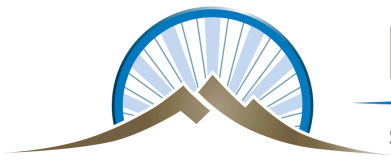
PUBLICATION AND ACKNOWLEDGEMENT

The Promontory will provide this policy and related procedures to students, parent(s) and volunteers, administrators, teachers and school staff by posting this policy and related procedures on the Promontory's publicly accessible website; and in student handbooks.

ANNUAL REPORTING

Promontory is required by Utah Code Subsection 53E-3-401 (3) and State Board of Education Administrative Rule R277-613 to report the following annually, on or before June 30, to the Superintendent in accordance with the Superintendent's submission requirements:

1. A copy of Promontory's policy required in Section R277-613-4;
2. Implementation of the signed statement requirement described in Utah Code Subsection 53G-9-605 (3)(g);
3. Verification of Promontory's training of school employees relating to bullying, cyberbullying, hazing, and retaliation, and abusive conduct described in Utah Code Section 53G-9-607;
4. Incidents of student bullying, cyber-bullying, hazing, and retaliation;
 - a. ~~+~~The number and type of incidents described in Subsection (4) that include a student who was alleged bullied, cyber-bullied, hazed, or retaliated against based



on the student's actual or perceived characteristics, including disability, race, national origin, religion, or sex, gender identity, or sexual orientation including the federal reporting requirements for civil rights violations.

EMPLOYEE GRIEVANCE

A school employee who has experienced abusive conduct must report the incident to the School or LEA designee in writing. If the school employee is not satisfied with the school or designee's investigation of the abusive conduct and/or the resulting disciplinary action and/or recommended disciplinary action against the perpetrator, the school employee may address/raise the issue in accordance with the school's grievance policies.

ADDITIONAL NOTES

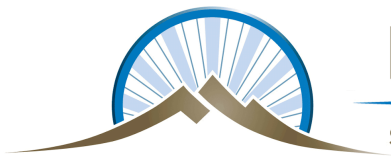
This policy applies to any student, school employee, contractor, visitor, or volunteer who engages in conduct that constitutes bullying or retaliation, all of whom have the responsibility to comply with this policy. Violation of this policy by any student, school employee, contractor, visitor, or volunteer will result in disciplinary action.

A school employee found to have committed an act of bullying, cyberbullying, hazing, or retaliation will be disciplined in accordance with policy.

This policy applies to bullying that:

1. Takes place at school or on school grounds;
2. Takes place while students are being transported to or from schools or school-sponsored events;
3. Takes place at any school-sponsored event, activity, function, program, instruction or training; or
4. Takes place through the use of technology. School officials have the authority to discipline students for off-campus or online speech that causes or threatens a substantial disruption to school operations, including violent altercations or a significant interference with a student's educational performance and involvement in school activities.

This policy does not prohibit expressive activity protected by the First Amendment of the United States Constitution. However, if off-campus speech that may constitute a bullying,



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cyber-bullying, or hazing incident creates a substantial disruption to the school environment, Promontory may take disciplinary action against the student who initiated the speech.

STATEMENT OF RECEIPT

Utah law requires that each year, a student aged eight and older and their parent/guardian sign a statement indicating that they have received Promontory's Bullying Policy. *See Utah Code Ann. Section 53G-9-605(3)(j).*

7/8 Community Learning Expedition Overview (Fall 2026)

Title	Journeys and Survival (Adopted from EL Education Curriculum)
School	PSEL
Grade level	7/8
Discipline(s)	Social Studies, ELA, Science, Math, Art, Music
Specific topic:	Experiences of the people of Southern Sudan
Start & end dates	Aug 19, 2026--Jan 8, 2027
Author(s)-- Great Thinkers	Emtithal Mahmoud - poet and activist. Emmanuel Kembe - musician. Linda Sue Park - author.
Expedition kick-off	A local Refugee presents her/his story to students or a fieldwork visit to the Salt Lake Center or Logan refugee center. Then show the movie “The Good Lie” about Sudan Refugees. Adventure - Southern Utah camp out - Water Hauling and Water Conservation
Service learning	Create refugee kits for an organization that helps refugees.
Fieldworks planned	<ol style="list-style-type: none"> 1. Overnight Fieldwork at Green River/Goblin Valley. September 30th-October 2nd. 2. Brigham City Wastewater Treatment Plant. Friday, November 20th. 3. Hike for Water. - Waterfall canyon in Ogden. Thursday, October 29th. 4. Refugee Center in Salt Lake or Logan. Thursday, September 3rd.
Expedition culmination	<p>Celebration of Learning -- Student groups get a choice board of items to pick from for their final product.</p> <ol style="list-style-type: none"> 1. Poetry Options - Poetry Slam, Poems in Two Voices, Movement Poem, Poem with Art 2. PSA commercial about Water Conservation or Helping Refugees. 3. Poster presentation about where our water comes from and how it’s processed (source to tap), or water conservation, or refugees. 4. Art product depicting water conservation and/or refugee issues. 5. Musical number relating to the theme of Refugee Survival. <p>Celebration at USU Brigham titled “A long walk to learning” - with the following stations.</p>

1. PSA's running in the theatre space on a loop
2. Two-voice poems
3. Presentations of different refugee groups as student selected case studies.
 - a. Data representations of water use, populations, etc.
 - b. Art presentations from each group.

Summary

In this eight-week module, students explore the experiences of people of Southern Sudan during and after the Second Sudanese Civil War. They build proficiency in using textual evidence to support ideas in their writing in shorter responses.

In Case Study 1, preface with a giant timeline of the Sudanese Civil Wars and place in the community. Students watch the movie "A Good Lie" about Sudanese refugees. Then students begin the novel *A Long Walk to Water* (720L) by Linda Sue Park. Students will read closely to practice citing evidence and drawing inferences from this compelling text as they begin to analyze and contrast the points of view of the two central characters, Salva and Nya. They also will read informational text to gather evidence on the perspectives of the Dinka and Nuer tribes of Southern Sudan.

In Case Study 2, students will read the remainder of the novel, focusing on the commonalities between Salva and Nya in relation to the novel's theme: how individuals survive in challenging environments. (The main characters' journeys are fraught with challenges imposed by the environment, including the lack of safe drinking water, threats posed by animals, and the constant scarcity of food. They are also challenged by political and social environments.) As in Unit 1, students will read this literature closely alongside complex informational texts (focusing on background on Sudan and factual accounts of the experiences of refugees from the Second Sudanese Civil War). Students will complete fieldwork by going hiking near a spring and going to a local resource center (Catholic Community Services) in our community. Case Study project would be an interview of a refugee community member. Students would also create the service kit flyers and prepare kits to donate.

Case Study 3 Visiting the local water treatment plant and relating it to walking to find water. Students will investigate how municipal water systems work and water conservation. Investigate the water shortage in Utah. Math connection calculating supply and demand in Utah. Students will also learn about what organizations are doing to solve water issues [Water Organizations](#)

This task addresses ELA standards RL.7.6, RL.7.11, W.7.4, W.7.5, W.7.8, W.7.9, L.7.1, and L.7.2. Science Standards 8.4.2 and 8.4.3

Guiding Questions

THEME QUESTION: What does it take to survive, and what is our responsibility when the resources for survival run dry?

Social Studies: (UT 4.4, U.S. 4.3.)

1. How do communities maintain their cultural identity when displaced by conflict into a completely foreign environment?
2. What are the civic responsibilities of Utah residents when welcoming new populations into our local communities?

Science: (8.4.2, 8.4.3)

1. How does Earth's natural systems restrict or provide access to fresh water in different regions of the world?
2. In what ways does a community's infrastructure change its relationship with water?
3. How can scientific data help us design better solutions for Utah's current water crisis?

Math: (7.RP, 8.EE, 8.SP,).

1. How do changing population rates affect the ratio of water supply to water demand in Utah?
2. What does a "water footprint" look like when quantified, and how does an average Utahn's footprint mathematically compare to a resident of South Sudan?
 - a. 8th Grade - Scatter plot -How does the _____ correlate to _____? Ex. Does the size of your house relate to your footprint?
 - b.

ELA: (7-8.R.11, W.7.8, SL.7.1)

1. How do authors use contrasting perspectives to paint a whole picture of a single event?
2. What makes an informational text "reliable" when researching complex historical conflicts?
3. How can we use our voices to honor someone else's story without changing its truth?

Student Friendly Questions

Authors of fiction both draw on and elaborate on historical facts in order to convey their ideas about what it was like to be alive during that time.

How do individuals survive in challenging environments?

How do culture, time, and place influence the development of identity?

How could learning about others' diverse experiences lead to greater awareness? (of myself, of others, of the world)

How does water in Utah make it from source to tap?

What water conservation problems do we face here in Utah? What are some possible solutions?

What is a refugee?

Standards Assessed in the Learning Expedition

Discipline	Standards	Long-Term Learning Targets
ELA		I can select evidence from a variety of sources to support analysis, reflection, and research. I can cite pieces of text-based evidence to support analysis of literary and informational text.
Speaking and Listening		I can effectively engage in discussions with diverse partners about topics, texts, and issues.
Social Studies	UT Standard 2.2:	I can explain the push-pull factors of immigration to Utah of various groups.

	<p>Students will compare the causes and lasting effects of various non-Mormon groups' migrations to Utah.</p> <p>UT Standard 4.4: Students will use data and other evidence related to a cultural, ethnic, or religious group in Utah to interpret the group's historic/current conditions and experiences.</p> <p>U.S. I Standard 4.3: Students will use historic case studies and current events to trace how and explain why the rights, liberties, and responsibilities of citizens have changed over time.</p>	<p>I can synthesize information to create a final product that shares individual survival and challenging environments.</p> <p>I can engage in deliberative, collaborative, and civil dialogue regarding historical and current issues.</p> <p>I can identify local, state, national, or international problems; engage with solutions to these problems; and share their ideas with appropriate public and/or private stakeholders.</p> <p>I can develop and demonstrate values that sustain America's democratic republic, such as open-mindedness, engagement, honesty, problem-solving, responsibility, diligence, resilience, empathy, self-control, and cooperation.</p>
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Anchor Text(s) (See the *Text Planner* for more details re: texts)
Anchor texts are key texts read to support content and literacy skills. Usually all students have a copy of anchor texts. Some anchor texts may be used with a single case study; others may be used across multiple case studies.

Title	Author/Illustrator	Text Type		Evidence of/Notes on Complexity*
A Long Walk to Water	Linda Sue Park	Novel		
"Life and Death in Darfur: Sudan's Refugee Crisis Continues"	Current Events, April 7, 2006			

Sudanese Tribes Confront Modern War	Karl Vick			
Loss of Culturally Vital Cattle Leaves Dinka Tribe Adrift in Refugee Camps	Stephen Buckley			
Water for South Sudan	Water for South Sudan, Inc.			
15 Organizations Tackling the Global Water Crisis	https://www.xerostech.com/hydrofinity-blog/organizations-addressing-the-worlds-water-issues https://conservewater.utah.gov/			
Science Seed Lessons 8th Grade Water Unit	https://www.seedstorylines.org/8-4-2			

* This links to “Evaluating Texts for their Level of Complexity”, an excerpt from EL’s “Succeeding with Complex Text” toolkit booklet.

Case Study/Studies and Key Summative Assessments	
1. Case study title	Reading for Evidence, Inferences, and Perspectives: <i>A Long Walk to Water</i> and informational text
Case study content	Students begin the novel <i>A Long Walk to Water</i> (720L) by Linda Sue Park. Students will read closely to practice citing evidence and drawing inferences from this compelling text as they begin to analyze and contrast the points of view of the two central characters, Salva and Nya. They also will read informational text to gather evidence on the perspectives of the Dinka and Nuer tribes of Southern Sudan.

Big ideas (broad concepts)	<ol style="list-style-type: none"> 1. read closely to practice citing evidence and drawing inferences from this compelling text 2. analyze and contrast the points of view of the two central characters, Salva and Nya 3. read informational text to gather evidence on the perspectives of the Dinka and Nuer tribes of Southern Sudan
Key standards that drive the case study	<p>RL 7.2 I can determine the central ideas of a literary text.</p> <p>SL 7.1 I can effectively engage in discussions with diverse partners about topics, texts, and issues.</p> <p>ELA Standard 7–8.R.11: Determine an author’s point of view or purpose in a text and analyze how the author distinguishes their position from that of others and responds to conflicting evidence or viewpoints. (RI)</p>
Midpoint assessment	Pulling Evidence from Text Assessment
End of case study assessment	On Demand Writing Assessment

Case Study/Studies and Key Summative Assessments

2. Case study title	The Theme of Survival
Case study content	<p>In Case Study 2, students will read the remainder of the novel, focusing on the commonalities between Salva and Nya in relation to the novel's theme: how individuals survive in challenging environments. (The main characters' journeys are fraught with challenges imposed by the environment, including the lack of safe drinking water, threats posed by animals, and the constant scarcity of food. They are also challenged by political and social environments.) As in Unit 1, students will read this literature closely alongside complex informational texts (focusing on background on Sudan and factual accounts of the experiences of refugees from the Second Sudanese Civil War). Students will complete fieldwork at a resource center in our community and connect with local refugees. Case Study project would be an interview of a refugee community member.</p>
Big Ideas/Broad Concepts	Point of View

	Story of Survival
Key standards that drive the case study	
Midpoint assessment	From the Module
End of case study assessment	Interview of a local refugee or someone who is helping the local refugee.

Case Study/Studies and Key Summative Assessments

3. Case study title	Water Treatment and Conservation
Case study content	Students will visit the local water treatment plant and relate it to walking to find water. Students will investigate how municipal water systems work and water conservation. Investigate the water shortage in Utah. Math connection calculating supply and demand in Utah. Students will also learn about what organizations are doing to solve water issues, Water Organizations .
Big Ideas/Broad Concepts	<ol style="list-style-type: none"> 1. How does water in Utah make it from source to tap? 2. What water conservation problems do we face here in Utah? What are some possible solutions?
Key standards that drive the case study	This task addresses ELA standards RL.7.6, RL.7.11, W.7.4, W.7.5, W.7.8, W.7.9, L.7.1, and L.7.2. Science Standards 8.4.2 and 8.4.3
Midpoint assessment	Fieldwork notes
End of case study assessment	Notes and analysis of water treatment and conservation.

4. Case study title	Individual/Group case studies of separate refugee groups
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Case study content	Students will choose refugee groups that they can study in small groups that they will present at the celebration. These studies will include a compare/contrast of different cultures of these groups as well as different needs as they acclimatize to the American culture. Kids will do a statistical analysis of why these groups are refugees.
Big Ideas/Broad Concepts	Refugee cultures differ in many ways, and those cultures have value. These cultures also have at least one thing in common; they are all refugees trying to fit into a culture that very much differs from theirs.
Key standards that drive the case study	*This task addresses ELA standards RL.7.6, RL.7.11, W.7.4, W.7.5, W.7.8, W.7.9, L.7.1, and L.7.2. Science Standards 8.4.2 and 8.4.3
Midpoint assessment	Short presentation (outline) of what they have for critique.
End of case study assessment	Students will present their 'station presentation' to each other for a final critique.

Resources & Links

Connections to the Community and the Larger World
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Fieldwork	Refugee Centers, connect to someone from Catholic Community Services in Ogden, water treatment plant, hike with spring by Waterfall Canyon - talk about walking for water.
Overnight Fieldwork	Goblin Valley - September
Experts	Assistant Professor Leslie Hadfield?, Refugee Center Representative, Refugees, Water Organization, Alan Riser, Steven Sorenson. Alan could come in more than once to present different topics. Local water conservancy (Amber can help connect). Weber Basin Water Conservancy District (Zach?) could teach about waterwise planting for lawns/gardens and water use/conservation.
Service learning	Create refugee kits for an organization that helps refugees.
Expedition kick-off	A local Refugee presents her/his story to students or a fieldwork visit to the Logan refugee center. Then show the movie "The Good Lie" about Sudan Refugees. Adventure - Southern Utah camp out - Water Hauling and Water Conservation
Expedition culmination	<p>Celebration of Learning -- Student groups get a choice board of items to pick from for their final product.</p> <ol style="list-style-type: none"> 6. Poetry Options - Poetry Slam, Poems in Two Voices, Movement Poem, Poem with Art 7. PSA commercial about Water Conservation or Helping Refugees. 8. Poster presentation about where our water comes from and how it's processed (source to tap), or water conservation, or refugees. 9. Art product depicting water conservation and/or refugee issues. 10. Musical number relating to the theme of Refugee Survival. <p>Celebration at USU Brigham titled "A long walk to learning" - with the following stations.</p> <ol style="list-style-type: none"> 4. PSA's running in the theatre space on a loop 5. Two-voice poems 6. Presentations of different refugee groups as student selected case studies. <ol style="list-style-type: none"> a. Data representations of water use, populations, etc. b. Art presentations from each group.

Scope and Sequence

Back to School Night - Have parents sign permission slips from Lesson 2 (for the movie "A Good Lie")

Case Study/ Lesson	Learning Target/ Standard	Notes	Materials
CS 1, Lesson 1	RL 7.2/SL 7.1	Keep lesson as is Set up A and B partner groups	A Long Walk to Water (one per student) Notice/Wonder note-catcher, Think-Pair-Share, Reader's Notes handouts/student creates doc and shares w/teacher for ongoing assessment
Expert Speaker Friday, Aug 28	Kick Off		
CS 1, Lesson 2 Monday, Aug 31	RL 7.2/SL 7.1	Keep lesson as is	Things Close Readers Do Anchor Chart exit ticket, Reader Notes
CS 1, Lesson 3	RL 7.2/RL 7.6/SL 7.1	Keep lesson as is	Back to Back and Face to Face Prompts (or other protocol) Things Close Readers Do exit ticket,
CS 1, Lesson 4	RL 7.1/RL 7.6	Whole Group discussion to produce Anchor Chart	Replace Graphic Organizer with Anchor Chart
CS 1, Lesson 5	RL 7.1/RL 7.6		Graphic Organizer
CS 1, Lesson 6	RL 7.1/RL 7.2/RL 7.11	Keep lesson as is Doc cam to mark up/annotate Each student has article	Article Time Trip: Sudan's Civil War, Exit Ticket
CS 1, Lesson 7	RL 7.1/RL 7.6	Keep lesson as is	Reader's Notes as ongoing assessment Gathering Evidence--Character Development in <i>A Long Walk to Water</i> (Digital or Paper)
CS 1, Lesson 8	RL 7.1/RL 7.6	Keep lesson as is	Mid-Unit 1 Assessment: Identifying Perspective and Using Evidence from <i>A Long Walk to Water</i> (chp 5)

CS 1, Lesson 9	RL 7.1/RL 7.6/SL 7.1/W 7.9	Keep lesson as is	Self-Reflection on Learning Target World Café prompts (for table cards) Pre-Writing Ideas (for Two-voice poem)
CS 1, Lesson 10	RL 7.1/RL 7.2/RL 7.11/L 7.4	Keep lesson as is	“Sudanese Tribes Confront Modern War”, TCRD anchor chart, Gathering Evidence graphic organizer for Excerpt 1 (each student and one to display), Doc Camera, Novel
CS 1, Lesson 11	RL 7.1/RL 7.2/RL 7.11/L 7.4		Materials from lesson 10 Adding to Gathering Evidence graphic organizer (focus on Perspectives)