

Update Memo

Please distribute to board members and appropriate staff.

PRESS

Policy Reference Education Subscription Service

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Next Issue: Fall Legislative Update

This publication is designed to provide information only and is not a substitute for legal advice from the Board Attorney. If you have any questions, please contact Debra Jacobson, Associate General Counsel and **PRESS** Editor, 630/629-3776, ext. 1211, Jeremy Duffy, IASB Deputy Executive Director/General Counsel and Assistant **PRESS** Editor, 630/629-3776, ext. 1226; or Maryam Brotine, Associate General Counsel and Assistant **PRESS** Editor, 630/629-3776, ext. 1219.

Please share this **PRESS** Update Memo with all board members and appropriate staff.

Two other important components of **PRESS** may be viewed and downloaded from **PRESS Online**: Committee Worksheets and the updated **Policy Reference Manual (PRM)** pages.

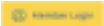

The Committee Worksheets, found by selecting a **PRESS Issue** at the top of the **PRESS Online** Table of Contents, show suggested changes to **PRESS** material by striking out deleted words and underscoring new words, a.k.a “tracked changes.”

Updated **PRM** pages can be found in the IASB POLICY REFERENCE MANUAL Table of Contents. For visual instruction about how to download and use **PRM** pages to update your policy manual, please go to www.iasb.com/policy/ to view the **PRESS** video tutorial located under the header entitled: **PRESS – Policy Reference Education Subscription Service**.

For answers to common questions about using **PRESS**, see [Q&A: Getting the Most Out of Your PRESS Subscription](#), now available on IASB’s website.

Online Instructions

Please follow these four easy steps to log in to **PRESS**:

- Go to www.iasb.com and click on the  button on the top navigation.
- 1. Enter your email address and password.
 - If you do not know your password, do not create a new account; reset your password using your district email address. Use the “forgot your password?” link. Make sure to check your spam folder for an email from info@iasb.com, if you do not see it in your email inbox.
 - If you are still having difficulty logging in, please contact your District’s Superintendent or Administrative Assistant to make sure you are listed as an authorized user on the District Roster.
 - If you continue to have difficulty signing on to www.iasb.com, please contact Michael Ifkovits at mifkovits@iasb.com.
- 3. Click the  button on the top navigator bar. This will bring you to your account page
- 4. Under “**My Account Links**,” click on “**PRESS Login**.”

PRESS Bundle

The bundle summarizes the global reasons for changes to all materials that are listed.

Specific details about how each piece of material changed, e.g., legislation, administrative rules, **PRESS** Advisory Board feedback, quality assurance, five-year review items, etc., are explained in numerical order in the **Revisions to Policies, Administrative Procedures, and Exhibits** table beginning on p. 4.

Please spend time reviewing the **PRESS** online Committee Worksheets for these materials, which will provide further, more on-the-spot detailed explanations in the footnotes, along with added comment boxes by the **PRESS** Editors when necessary.

Have feedback on **PRESS** materials?

Click on the **PRESS** Feedback Button, located on the header bar of **PRESS Online**. For answers to more immediate questions about **PRESS** content, please contact a **PRESS** editor directly.

Title IX Regulations

The U.S. Dept. of Education released final regulations implementing Title IX of the Education Amendments of 1972 (Title IX), effective 8-1-24. Compared to the previous Title IX regulations, the new 2024 Title IX regulations:

- Expand the breadth of Title IX grievance procedures to require that they be used to address *all* Title IX sex discrimination complaints, not just complaints of sexual harassment.
- Clarify that the scope of Title IX sex discrimination includes discrimination on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and/or gender identity.
- Allow districts the flexibility to use a single investigator/decisionmaker template, so that the same individual who investigates a Title IX complaint may also make a decision regarding the complaint.

The 2:265 suite of **PRESS** material has been overhauled in response to the 2024 Title IX regulations, beginning with **REWRITTEN** sample policy 2:265, *Title IX Grievance Procedure*. Districts must still develop a notice of nondiscrimination, train all employees on Title IX, and respond in some manner to all reports of alleged Title IX sex discrimination, regardless of whether a formal complaint is filed. These requirements are set forth in **REWRITTEN** sample administrative procedure 2:265-AP1, *Title IX Response*. Should a formal Title IX complaint be filed, requirements for processing a complaint are set forth in **REWRITTEN** sample administrative procedure 2:265-AP2, *Formal Title IX Complaint Grievance Process*. **NEW** sample administrative procedure 2:265-AP3, *Title IX Coordinator*, states all Title IX Coordinator responsibilities in one document. **REWRITTEN** sample exhibit 2:265-E, *Title IX Glossary of Terms*, contains all updated terms from the 2024 Title IX Regulations, as well as a sample definition of *consent* and a summary of sex discrimination governed by laws other than Title IX.

Aside from material in the 2:265 suite, most **PRESS** material impacted by the 2024 Title IX regulations has also been updated in this issue. Please note, however, that the following items will be updated in response to both the 2024 Title IX regulations and recent Illinois legislative changes in **PRESS** Issue 117 (October 2024): sample administrative procedure 2:250-E2, *Immediately Available Public Records and Web-Posted Reports*; sample policy 5:20, *Workplace Harassment Prohibited*; and sample policy 7:10, *Equal Educational Opportunities*.

The **PRESS** editors extend their gratitude to the following individuals for their expert drafting and feedback on many pieces of **PRESS** material on Title IX Regulation updates: **Emily P. Bothfeld**, Partner, Robbins Schwartz; **Amy K. Dickerson**, Partner, Franczek P.C.; **Stephanie E. Jones**, Partner, Kriha Boucek; **Maureen A. Lemon**, Partner, Ottosen DiNolfo Hasenbalg & Castaldo, Ltd.; **Ellen D. Lueking**, Senior Associate, Miller, Tracy, Braun, Funk & Miller, Ltd.; and **Jennifer M. Rosenberg**, Partner, Hodges, Loizzi, Eisenhammer, Rodick & Kohn, LLP.

PRESS Terminology

What are the meanings of the “AP” and “E” after certain policy numbers?

The **PRESS Policy Reference Manual (PRM)** is an encyclopedia of sample board policies, administrative procedures, and exhibits. They are all in numerical order for easy reference. **PRESS** recommends that local school districts maintain separate board policy and administrative procedure manuals to help distinguish for the board, staff, students, parents, and community members, the distinction between board documents and staff documents, board work, and staff work.

Policy. The board develops policies with input from various sources like district administrators, the board attorney, and **PRESS** materials. The board then formally adopts the policies, often after more than one consideration.

After adoption by the board, each policy should have an adoption date.

Administrative Procedures. Administrative procedures are developed by the superintendent, administrators, and/or other district staff members. The staff develops the procedures that guide implementation of the policies. Administrative procedures are not adopted by the board, which allows the superintendent and staff the flexibility they need to keep the procedures current. **PRESS** sample procedures are numbered to correspond with the policies that they implement for easy reference. For example, policy 6:190’s related administrative procedure is 6:190-AP.

Administrative procedures should be dated for implementation by the administrative staff and kept separately from the board policy manual.

Exhibits. Both board policies and administrative procedures may have related exhibits. Exhibits provide information and forms intended to be helpful to the understanding or implementation of either a board policy or administrative procedure, and they do not require formal board adoption. **PRESS** sample exhibits are numbered to correspond to the related board policy or administrative procedure. For example, Board Policy 2:70 has a related exhibit numbered 2:70-E. Administrative procedure 7:340-AP1 has a related exhibit numbered 7:340-AP1, E.

Exhibits labeled with an “E” may provide guidance for board work or staff work. Those providing guidance for board work should be dated for implementation by the board. Those providing guidance for the staff should be dated for implementation by the administrative staff.

Administrative procedures exhibits, always labeled with the “AP, E” format should be dated for implementation by the administrative staff.

The following **PRESS** materials are updated or created in response to the 2024 Title IX regulations:

- 2:260, Uniform Grievance Procedure
- 2:265, Title IX Grievance Procedure – **REWRITTEN**
- 2:265-AP1, Title IX Response – **REWRITTEN**
- 2:265-AP2, Formal Title IX Complaint Grievance Process – **REWRITTEN**
- 2:265-AP3, Title IX Coordinator – **NEW**
- 2:265-E, Title IX Glossary of Terms – **REWRITTEN**
- 5:100, Staff Development Program
- 7:10-AP1, Accommodating Transgender, Nonbinary, or Gender Nonconforming Students

- 7:10-AP2, Accommodating Breastfeeding Students
- 7:20, Harassment of Students Prohibited
- 7:20-AP, Harassment of Students Prohibited
- 7:185, Teen Dating Violence Prohibited

Please also spend time reviewing the **PRESS** Online Committee Worksheets for these materials, which will provide further, more on-the-spot detailed explanations in the footnotes, along with added comment boxes by the **PRESS** Editors when necessary.

Progress Report - The contents of this table frequently change.

Topics	Our Response
<p>New Law Requires Districts to Develop Cardiac Emergency Response Plans</p> <p>Public Act 103-608, effective 1-1-25, will require districts to develop a cardiac emergency response plan (CERP) and distribute it to all teachers, administrators, school support personnel, coaches, and any other staff identified by the district. The law also incorporates review of the CERP into a district’s annual review of its emergency and crisis response plan. Finally, starting with the 2025-26 school year, each district will have to provide information to staff regarding emergency procedures and life saving techniques no later than 30 days after the first day each school year. Specific training, however, is not required.</p>	<p>Relevant materials, including sample PRESS policy 4:170, <i>Safety</i>, and other materials within the 4:170 suite will be updated in PRESS Issue 117.</p>
<p>Reminder That Boards Need to Study and Decide Potential Opt-Out From College and Career Pathway Endorsement Requirement by 7-1-25</p> <p>As we have reported in prior Progress Reports, 105 ILCS 5/10-20.83, added by P.A. 102-917, will require boards to elect to implement College and Career Pathway Endorsements for grades 9 through 12 by 7-1-25, unless a board decides to opt out of all or part of the requirement by adopting a set of findings that considers six different factors. Final regulations implementing the College and Career Pathway Endorsement System were issued on 5-9-24. 23 Ill.Admin.Code Part 258. Districts will also be required to adopt and commence implementation of career exploration and career development activities for grades 6-12 in accordance with the Illinois PaCE Framework by 7-1-25. For additional resources, see www.isbe.net/pathwayendorsements, www.isbe.net/Pages/Student-Resources.aspx, and www.isac.org/pace/index.html.</p>	<p>Relevant PRESS materials, including sample policy 6:60, <i>Curriculum Content</i>, will be updated in PRESS Issue 117.</p>

PRESS Issue 116 Trivia

71 pages • 22,918 words • 12 PRM materials

Certain **PRM** materials in a **PRESS** Issue may be labeled in the **PRESS** Bundles, Revision Table and Committee Worksheets with one or more of the following categories:

NEW. This material is brand new to the **PRM**.

RENUMBERED. This material has been assigned a new number within the **PRM**, usually due to the addition of **NEW** material.

RENAMED. The title of the material has been amended.

REWRITTEN. The material has undergone significant revisions. To preserve the readability of the Committee Worksheets, suggested changes are not shown as tracked changes.

REFORMATTED. Non-substantive changes in formatting, e.g., list renumbering, have been applied for consistency throughout the **PRM**. To preserve the readability of the Committee Worksheets, such formatting changes are not reflected as tracked changes.

Revisions to Policies, Administrative Procedures, and Exhibits

Number and Title	Revision Descriptions
2:260, Uniform Grievance Procedure	<p>The policy, Legal References, and footnotes are updated. The policy and footnotes are updated for continuous improvement and in response to final regulations implementing Title IX of the Education Amendments of 1972 (Title IX), requiring all Title IX sex discrimination complaints to be processed using sample policy 2:265, <i>Title IX Grievance Procedure</i>.</p> <p>Footnote 4 is updated in response to final regulations implementing Title II of the Americans with Disabilities Act (Title II), requiring school districts to implement the Web Content Accessibility Guidelines (WCAG) Version 2.1, Level AA for their web content and mobile apps.</p> <p>The Legal References are updated for continuous improvement.</p> <input data-bbox="1442 806 1477 844" type="checkbox"/>
2:265, Title IX Grievance Procedure	<p>REWRITTEN. The policy and footnotes are updated in response to final regulations implementing Title IX.</p> <input data-bbox="1442 1159 1477 1197" type="checkbox"/>
2:265-AP1, Title IX Response	<p>REWRITTEN. The procedure is updated for the reason stated in 2:265, <i>Title IX Grievance Procedure</i>, above.</p> <input data-bbox="1442 1260 1477 1297" type="checkbox"/>
2:265-AP2, Formal Title IX Complaint Grievance Process	<p>REWRITTEN. The procedure is updated for the reason stated in 2:265, <i>Title IX Grievance Procedure</i>, above.</p> <input data-bbox="1442 1360 1477 1398" type="checkbox"/>
2:265-AP3, Title IX Coordinator	<p>NEW. The procedure is created for the reason stated in 2:265, <i>Title IX Grievance Procedure</i>, above.</p> <input data-bbox="1442 1461 1477 1499" type="checkbox"/>
2:265-E, Title IX Glossary of Terms	<p>REWRITTEN. The exhibit is updated for the reason stated in 2:265, <i>Title IX Grievance Procedure</i>, above.</p> <input data-bbox="1442 1562 1477 1600" type="checkbox"/>

Revisions to Policies, Administrative Procedures, and Exhibits — *continued*

5:100, Staff Development Program	<p>The policy, Administrative Procedure References, and footnotes are updated. The policy and footnotes are updated in response to:</p> <ol style="list-style-type: none"> 1. 105 ILCS 5/10-22.39(b-5), amended by P.A. 103-603, eff. 1-1-25, deleting “chronic health conditions of students” from the list of required staff training regarding health conditions of students; 2. 105 ILCS 5/10-22.39(b-20), amended by P.A. 103-603, eff. 1-1-25, requiring in-service training on the definitions of <i>trauma</i>, <i>trauma-responsive learning environments</i>, and <i>whole child</i> as set forth in 105 ILCS 5/3-11; and 3. 34 C.F.R. §106.8(d), updating Title IX training requirements for staff. <p>The footnotes are also updated in response to:</p> <ol style="list-style-type: none"> 1. 105 ILCS 5/10-22.39(b-5)(7), amended by P.A. 103-603, eff. 1-1-25, providing immunity for trained employees using a trauma kit; 2. 105 ILCS 110/3, amended by P.A. 103-609, eff. 1-1-25, requiring districts to provide staff with information on emergency procedures and life-saving techniques within 30 days after the first day of each school year; and 3. Continuous improvement. <p>The Administrative Procedure References are updated to add NEW sample administrative procedure 2:265-AP3, <i>Title IX Coordinator</i>.</p>	<input type="checkbox"/>
7:10-AP1, Accommodating Transgender, Nonbinary, or Gender Nonconforming Students	The procedure is updated for the reason stated in 2:265, <i>Title IX Grievance Procedure</i> , above.	<input type="checkbox"/>
7:10-AP2, Accommodating Breast-feeding Students	The procedure is updated for the reason stated in 2:265, <i>Title IX Grievance Procedure</i> , above.	<input type="checkbox"/>
7:20, Harassment of Students Prohibited	The policy and footnotes are updated for the reason stated in 2:265, <i>Title IX Grievance Procedure</i> , above, and for continuous improvement.	<input type="checkbox"/>
7:20-AP, Harassment of Students Prohibited	The procedure is updated to ensure alignment with continuous improvement updates made to sample policy 2:260, <i>Uniform Grievance Procedure</i> .	<input type="checkbox"/>
7:185, Teen Dating Violence Prohibited	The policy is updated for the reason stated in 2:265, <i>Title IX Grievance Procedure</i> , above, and for continuous improvement.	<input type="checkbox"/>



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Acknowledgement to PRESS Advisory Board

The **Policy Reference Education Subscription Service (PRESS)** Advisory Board consists of a group of distinguished individuals, from the legal and education field. These individuals dedicate and volunteer their time to provide valuable input and suggestions on **PRESS** Issues. We appreciate their contributions and thank them sincerely.

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