

Addendum

This Addendum to that certain Agreement pertaining to the School Resource Officer Program made by and between Independent School District No. 16 of Payne County, Oklahoma, commonly known as Stillwater Public Schools (the "District"), and the City of Stillwater on behalf of the Stillwater Police Department (the "City") is made effective upon the date of the last signature affixed hereto.

~~WHEREAS, the City and District are Parties to an existing Agreement related to the School Resource Officer Program (SRO), the term of which began on July 1, 2025, and expires June 30, 2026;~~

WHEREAS, the Parties have reached an understanding as it relates to access by SROs to student records in compliance with the federal Family Educational Rights and Privacy Act (FERPA) at 20 U.S.C. § 1232g and its companion regulations; and

WHEREAS, the Parties desire to amend the Agreement pursuant to this understanding.

NOW THEREFORE, in consideration of the mutual promises and conditions made herein, the sufficiency of which is hereby acknowledged, the Parties hereto agree as follows:

- I. **Access to Education Records.** The language in Paragraph 14 title "Access to Education Records" is hereby struck and replaced with the following language:
 - 14.1. **School Official Designation.** The District designates the assigned SROs as "School Officials" with a "Legitimate Educational Interest" as defined by FERPA (34 CFR § 99.31(a)(1)(i)). This designation is to be narrowly construed and is for the limited purpose of assisting the District with:
 - Maintaining a safe and secure school environment.
 - Investigations of criminal activity occurring on school property or at school-sponsored events.
 - Protecting the health and safety of students or other individuals.
 - 14.2. **Scope of Access to Student Information System and Education Records.** The District shall grant the SROs **limited, secure access** to the student information system or physical education records only as necessary to fulfill the legitimate educational interest defined above. This access shall be restricted to data points such as, but not limited to:
 - Student directory information (as defined by the District's Board of Education).
 - Class schedules and attendance records.
 - Any other information specifically deemed necessary by the Superintendent of Schools or their designee for a health or safety emergency or criminal investigation.

14.3. Confidentiality and Training. SROs shall be trained annually by the District on the requirements of FERPA, specifically the proper handling, use, and non-disclosure and re-disclosure of Personally Identifiable Information (PII) from education records. SROs shall use PII only for the purpose of fulfilling their duties as a School Official under this MOU.

Prohibited Use: SROs shall not use access to the student information system for general criminal law enforcement purposes unrelated to school safety or an incident involving a student on school grounds. Access shall not be utilized to create a law enforcement database of student information.

Re-Disclosure: SROs shall not re-disclose PII obtained from student education records to any other person or agency, including other members of their employer, the Stillwater Police Department, unless:

- The re-disclosure is authorized by the District in writing.
- The re-disclosure is allowed under a FERPA exception (e.g., in response to a lawfully issued subpoena or court order).
- The re-disclosure requirements of FERPA are satisfied, including but not limited to, the receiving party uses the PII only for the purposes for which the disclosure was made and the SRO makes and maintains a record of the re-disclosure.

14.4. Law Enforcement Records. Records created and maintained by SROs in their capacity as a law enforcement officer, for law enforcement purposes (e.g., arrest reports, investigative reports), are Law Enforcement Records and are not considered "education records" under FERPA (34 CFR § 99.8). The disclosure of such records is governed by Oklahoma state law and City policy, not by FERPA.

14.5. Roles and Responsibilities of the District.

- Provide FERPA Training to all assigned SROs.
- Establish and monitor the SROs' specific access level within the student information system.
- Determine what student information is necessary for the SROs to perform their duties as School Officials.
- Maintain a record of all disclosures of PII from education records made by school personnel to the SRO under the "health or safety emergency" exception of FERPA, including the articulable and significant threat that formed the basis of the disclosure.

14.5. Roles and Responsibilities of the City.

- Ensure that all assigned SROs complete the District's FERPA training.
- Require SROs to adhere to the limited scope of access and use of student information as defined in this MOU.

- Require SROs to consult with the appropriate school administrator prior to requesting access to an education record, whenever practicable, and document the basis for the request.
- Require SROs to safeguard any PII obtained from the District's education records, ensuring it is secured in a locked area or secure electronic system separate from general Department records.

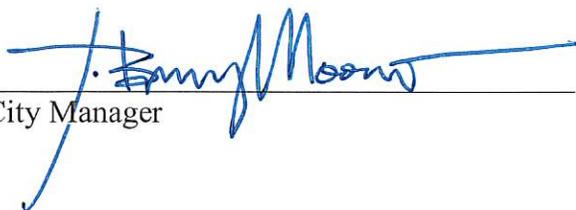
IN WITNESS WHEREOF, the Parties hereto agree to this Addendum upon the date of the last signature affixed hereto.

Independent School District No. 16 of Payne County, Oklahoma (Stillwater Public Schools)

President, Board of Education

Date

City of Stillwater, Stillwater Police Department



City Manager

1 | 23 | 2026

Date