

*Adopted:*  
*Revised:*

INDEPENDENT SCHOOL DISTRICT 761  
OWATONNA, MINNESOTA

## **625 RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE**

### **I. PURPOSE**

The purpose of this policy is to establish clear and actionable guidelines for the responsible, ethical, and transparent use of Artificial Intelligence (AI) within Owatonna Public Schools (ISD 761). This policy seeks to support and enhance teaching, learning, and administrative efficiency while upholding academic integrity, protecting privacy, and ensuring equitable access for all students and staff.

Artificial intelligence (AI) language models can assist with various tasks from teaching and learning, to writing support, to data analysis. School district staff who have access to AI tools should understand underlying behaviors and the potential benefits and limitations associated with use.

Owatonna Public Schools recognizes that the use of AI can, when used appropriately, enhance student learning by improving the efficiency of education, providing new and creative ways to support learning, and encourage independent research, curiosity, critical thinking, and problem solving. The school district also recognizes the limitations and potential for misuse of AI.

The school district authorizes staff members to utilize and permit students to utilize ethical and legal use of AI as a supplemental tool to support and expand on classroom instruction, facilitate personalized learning opportunities, and increase educational and learning opportunities, in accordance with the terms of this policy. The school district authorizes staff to utilize AI as a tool in fulfilling their work responsibilities as consistent with federal and state law and school district policies.

### **II. GENERAL STATEMENTS OF POLICY**

- A. The school district supports use of AI in ways that uphold academic integrity and foster student critical thinking and original work.
- B. The school district supports AI use as an augmentative tool rather than as an autonomous decision-maker.
- C. The school district recognizes that human intelligence and H-AI-H protocols should drive the educational process, with AI supporting education and humans remaining accountable for decisions and outcomes.
- D. The school district supports the use of AI to enhance administrative operations

and efficiency.

- E. Student and staff use of AI shall be transparent and responsible. Appropriate attribution shall be provided.
- F. The superintendent designee will implement and regularly review privacy controls and safety features to protect student, staff, and school district data associated with approved use of AI.
- G. The school district supports and promotes fair access to approved AI tools and will strive to ensure equitable access for all students and staff.
- H. The school district will provide ongoing training and guidance to mitigate the potential for bias and misinformation and will hold students and staff accountable for the consequences of AI use.
- I. This policy applies to all AI use by students and staff regardless of whether the use occurs on school district property, at school district events and activities, or off campus when a nexus to the school district's educational environment exists. Student AI use must be consistent with school district policies on use of cell phones, personal electronic devices, wearable AI devices, and the internet.
- J. The school district recognizes that a student's age may be a key consideration in determining appropriate AI use. For this reason, the school district establishes the following guidelines:
  - 1. Kindergarten through Grade 5: only highly restricted, teacher-mediated AI interactions are permitted. The focus is upon conceptual understanding of AI.
  - 2. Grades 6 through 8: structured introduction to AI tools together with appropriate guardrails. Critical thinking about AI outputs and digital citizenship will be addressed.
  - 3. Grades 9 through 12: centers upon broader AI access with accountability expectations; preparation of students for AI-integrated postsecondary and workforce environments; advanced AI literacy, including an understanding of how AI models work.

### **III. DEFINITIONS**

Definitions of key terms shall be reviewed and updated as needed to ensure alignment with current technology, legal standards, and school district practices.

- A. Artificial intelligence in a school district is a category of computer-based systems that analyze data and recognize patterns to support teaching, learning, and administrative operations, for the purpose of assisting human decision-making, within educational and legal constraints, and excluding the replacement of

professional judgment or human accountability.

- B. Agentic AI involves systems capable of undertaking multistep actions autonomously, such as web browsing, code execution, interaction with other software, and rendering sequential decisions, without human intervention at each step.
- C. Confidential Data/Information: Information that the school district is prohibited by law, policy, or contract from disclosing. Confidential data includes personally identifiable information (PII) about students and employees, medical information, student education records, and individualized education program (IEP) or Section 504 plans.
- D. Deep Fake: Any video recording, motion-picture film, sound recording, electronic image, or photograph that is so realistic that a reasonable person would believe it depicts speech or conduct of an individual who did not in fact engage in such speech or conduct.
- E. Generative Artificial Intelligence (GenAI): Computer-based systems that generate content—such as text, images, audio, or data analysis—in response to prompts.
- F. Human-AI-Human Model (H-AI-H): The H-AI-H model establishes a decision-making framework requiring human judgement at the initiation and human accountability at the conclusion of AI-assisted processes.
- G. Personally Identifiable Information (PII): Information that can be used to distinguish or trace an individual's identity, such as names, addresses, social security numbers, or indirect identifiers.
- H. School District-Approved AI Tool: Any AI platform or application that has been reviewed and authorized by the Owatonna Public Schools Technology Department and District Administration. Examples of approved tools currently include platforms such as Brisk, Gemini, and Diffit.

#### **IV. EQUITABLE ACCESS TO AI TECHNOLOGY**

The school district is committed to ensuring that all students and staff have fair and equitable access to AI technology and related resources. To fulfill this commitment, the school district will:

- A. Provide necessary devices, internet connectivity, and assistive technologies to students and staff who need them.
- B. Regularly assess and address barriers to access, including those related to socioeconomic status, disability, language, and geographic location.
- C. Provide ongoing training for staff and students covering technical skills and

ethical considerations, including recognizing and mitigating bias in AI systems.

- D. Engage students, families, and community members in ongoing evaluation of equitable access.
- E. Take timely corrective action if disparities in access or outcomes are identified.

## **V. CURRICULUM INTEGRATION AND AI LITERACY**

- A. The superintendent designee will work with school district staff to establish instructional protocols and criteria consistent with the H-AI-H model that identify teacher AI use to assess student work; restrict AI use in student disciplinary matters or placement decisions; require transparency when AI use is part of a decision; and establish the right to request a review of the human decision-making in a consequential AI-influenced decision.
- B. Any use of AI in the classroom or on class assignments must align with the teachers' instructions and use expectations. Teachers will direct student use of AI, ensuring that it aligns with the school district guidelines and the approved tools list.
- C. Use of AI must comply with the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), and other federal and state laws.
- D. Students will indicate AI use on assignments as required by the teacher and the assignment.

## **VI. DISTRICT OVERSIGHT AND ADMINISTRATION**

Owatonna Public Schools delegates the oversight, vetting, and implementation of Artificial Intelligence technologies to the superintendent designee.

- A. The superintendent designee shall establish district-wide direction and a road map for AI use that aligns with the school district's mission, strategic plan, and resources.
- B. The Administration will vet AI prior to use of AI by the staff or students. Administration will support use of approved AI by staff and students, prioritizing the security of student, employee, and school district data.
- C. Administration will maintain and update the list of School District-Approved AI Tools (such as Brisk, Diffit, Gemini) and provide guidelines for staff seeking approval of new AI platforms. Requests for additional consideration will be submitted to building leadership, which will be approved or denied by district leadership. Inventory of approved tools will be included in the annual subscription audit.

- D. Administration will provide guidance to school district counselors and other staff on recognizing and addressing a student's unhealthy AI dependency, overreliance on AI for emotional support, or similar AI-related mental health impacts.

## **VII. STUDENT USE GUIDELINES**

Students may use school district-approved AI tools for educational purposes only as directed by teachers and in compliance with assignment guidelines.

- A. Permitted Student Uses of AI: When authorized by the teacher, students may use school district-approved AI tools for exploring academic concepts, brainstorming ideas, seeking guidance on research directions, and receiving feedback on drafts.
- B. Verification and Academic Integrity: Students must verify AI-generated information using reliable sources. Submitting AI-generated content or content significantly assisted by AI as original work without attribution is prohibited.
- C. Privacy and Data Protection: Students must not upload or input personal, confidential, proprietary, or sensitive information into any AI tool. Examples include passwords, names, Social Security numbers, or details from IEPs.
- D. Prohibited Student Uses of AI: Students may not use AI tools to create harmful or sexually explicit material; engage in harassment, discrimination, or bullying; violate any school district policy; or utilize AI to create deep fakes, synthetic media, or voice cloning.
- E. Consequences for Misuse: Disciplinary action may be taken as outlined in the school district's Student Discipline Policy. Violation may result in loss of AI privileges and/or further disciplinary or legal action.

## **VIII. STAFF USE GUIDELINES**

Staff may use school district-approved AI tools to enhance educational experiences, provided all use complies with applicable laws and school district policies.

- A. Staff Use of AI for Educational Purposes: Staff may consult AI for ideas, outlines, and other methods to enhance students' educational experience, such as supplementing lesson plans and providing differentiated instruction. Staff must supervise student use of AI to ensure it is being used appropriately and implement the H-AI-H model. An AI detection tool must be independently validated before a school district staff member uses the tool and will not be the sole basis of information relied upon in an investigation.
- B. Staff Use for Work Responsibilities: The school district supports AI use by school staff to assist with document assistance, research support, administrative tasks,

data analysis, and automation.

- C. Privacy and Data Protection: Staff should not upload or input any confidential data, private data, proprietary information, personally identifiable information, or sensitive information into any AI tool.
- D. Prohibited Staff Uses of AI: Staff may not use AI tools to create harmful material, engage in harassment, violate laws, or create synthetic images, audio, video, or texts concerning another individual without the individual's explicit consent.
- E. Discipline: Staff who violate this policy may be subject to discipline, including termination, as set forth in the Discipline, Suspension, and Dismissal of School District Employees policy.

## **IX. DATA AND ARTIFICIAL INTELLIGENCE**

All data use involving AI must comply with applicable state and federal laws, school district regulations, and acceptable use policies. The school district will train staff and students on data stewardship, privacy, and legal compliance. Users should assume that all consumer AI products make data publicly available unless otherwise indicated pursuant to explicit official agreement with the school district.

## **X. AI VENDOR AGREEMENTS AND LICENSING**

- A. AI technologies procured by the school district must include clear intellectual property rights provisions. Vendors must provide bias testing disclosure, documentation, and incident reporting procedures.
- B. Evaluation criteria shall include data handling, model transparency, bias auditing, accessibility compliance, FERPA/COPPA compliance, and data residency.
- C. A contractual agreement between the school district and an AI vendor must establish the ownership of content created through use of the vendor's AI technology services, prohibit use of student data for model training, and establish data deletion rights.

## **XI. AI AND RECORDS RETENTION**

- A. A document created, received, or maintained through an AI system may constitute a school district record.
- B. AI-generated or AI-assisted data shall be treated as a school district record when the data documents a school district action, policy, or operation; or is relied upon when making an educational, administrative, or financial decision.

## **XII. REPORTING AI-RELATED CONCERNS, MISUSE, AND INCIDENTS**

- A. Staff and students should contact the building principal or the principal's designee if concerns regarding safe and effective use of AI arise or if they suspect AI misuse that violates school district policies, procedures, or applicable laws.
- B. The superintendent designee will develop an AI structured incident response plan that includes response protocols for AI-facilitated cheating at scale, deep fakes, data breaches, and student welfare concerns.

## **XIII. TRAINING AND NOTICE**

The school district will train all school district staff, teachers, and students on the requirements of this policy, AI procedures and plans, and other school district policies regarding data management and privacy, acceptable uses of AI, and AI prohibitions. The school district will inform students, parents, and guardians about AI use in the school district.

## **XIV. REVIEW**

The school district's administration will regularly review use of AI and recommend safety, privacy, student and staff needs, and other relevant updates to the school board to help ensure that the school district adapts to changing technologies and circumstances.

### **Legal References:**

Minn. Stat. § 13.02 (Definitions)

Minn. Stat. § 13.32 (Educational Data)

15 U.S.C. §§ 6501-6506 (Children's Online Privacy Protection Act)

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

20 U.S.C. §§ 1400-1419 (Individuals with Disabilities Education Act)