

Regular Meeting of the Board of Education

Wednesday, May 13, 2026 6:00 PM

Independence Junior High School, 6610 W. Highland Dr., Palos Heights, IL 60463

1. Call to Order

1.A. Pledge to the Flag

1.B. Roll Call

2. Superintendent's Report

2.A. Staff Recognition

2.A.1. Tenure

- Jamie Fioravanti
- Allison Schaar
- Anna Szymonik

2.A.2. Years of Service

Five Years

- Tomas Del Toro
- Shea Soraghan
- Sarah Sumoski
- Jennifer Startz

2.A.3. Ten Years

- Beth Cosme
- Elizabeth Klyczek
- Tony Marinello
- Sharon Rosynek

2.A.4. Fifteen Years

- Maria Curtin
- Mary Lynn Duffy
- Carrie Hoban
- Gina Livers
- Marianne Martlink

2.A.5. Twenty Years

- Kim Patla
- Jessica Ryan
- Trudy Walts

2.A.6. Twenty-Five Years

- Andrew Janotta
- Heather Meskimen
- Diane Muller

2.B. Screen Free Summer Event - Colleen Dunford

2.C. Registration Update

3. Approval of the Consent Agenda Items

3.A. Minutes of the Regular Meeting of April 15, 2026

3.B. Minutes of the Closed Session Meeting of April 15, 2026

3.C. Approval of Bills & Payroll

3.D. Review of Schools' Activity Accounts

3.E. Proposed Board of Education Meeting Schedule 2026-2027

3.F. Personnel

3.F.1. Hiring

- E. Lappano, Pre-K Paraprofessional, Indian Hill, effective August 18, 2026

3.F.2. Resignation

- S. Sumoski, Reading Intervention Paraprofessional, Navajo, effective June 2, 2026
- M. Castor, Special Education Kindergarten Teacher, Indian Hill, effective June 2, 2026

4. **Old Business**

4.A. Honorable Reduction in Force

- J. Weber, Part-time Paraprofessional, effective June 2, 2026

5. **New Business**

5.A. Installation of New Carpet

5.B. Approval of New District Auditors: Baker & Tilly Auditing Services

5.C. **Policy Drafts: First Read**

- 2:200 Types of Board of Education Meetings
- 2:220 Board of Education Meeting Procedure
- 2:250 Access to District Public Records
- 2:260 Uniform Grievance Procedure
- 4:165 Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors
- 5:30 Hiring Process and Criteria
- 5:250 Leaves of Absence
- 5:330 Sick Days, Vacation, Holidays, and Leaves
- 6:65 Student Social and Emotional Development
- 6:100 Using Animals in the Educational Program
- 6:145 Migrant Students
- 6:180 Extended Instructional Programs
- 7:20 Harassment of Students Prohibited
- 7:50 School Admissions and Student Transfers To and From Non-District Schools
- 7:100 Health, Eye and Dental Examinations: Immunizations and Exclusion of Students
- 8:185 Teen Dating Violence Prohibited

- 7:240 Conduct Code with Participants in Extracurricular Activities
- 7:260 Exemption from Physical Education
- 7:300 Extracurricular Athletics
- 8:90 Parent Organizations and Booster Clubs
- 2:140 Exhibit - Guidance for Board Member Communications, Including E-Mail Use

5.D. DISTRICT CONTACT EDITS ONLY

- 2:265 Title IX Grievance Procedure
- 5:10 Equal Employment Opportunity and Minority Recruitment
- 5:20 Workplace Harassment Prohibited
- 7:180 Prevention of and Response to Bullying, Intimidation and Harassment

5.E. REVIEW & MONITORING

- 7:220 Bus Conduct
- 7:230 Misconduct by Students with Disabilities
- 7:280 Communicable and Chronic Infectious Disease

6. Audience Participation

If you are coming up to speak, please identify yourself by name and connection to the district and we ask that comments remain brief to accommodate everyone wishing to speak. Policy ordinarily provides up to 3 minutes per speaker.

7. Information Items

7.A. YTD Financial Summary

7.B. Freedom of Information Act Items

8. Closed Session

Discuss the appointment, compensation, discipline, performance, or dismissal of a specific employee; collective negotiating matters or deliberations concerning salary schedules for classes of employees; discussion of possible litigation; and student disciplinary issues. The placement of individual students in special education programs and other matters relating to individual students.

9. Return to Open Session

9.A. Action from Closed Session

- Suspension Hearing Determination Case #1281517

10. Adjournment

PALOS HEIGHTS SCHOOL DISTRICT 128

MAY 2026

GROSS PAYROLLAPRIL 1 THROUGH APRIL 30, 2026

357,204.86

TRS

24,005.69

BOARD TRS SURCHARGE

1,520.00

THIS

4,113.92

IMRF, FICA, MEDICARE

18,545.02

TOTAL APRIL PAYROLL, TRS, THIS, IMRF, FICA, MEDICARE

405,389.49

EDUCATION FUND 10

142,627.33

BUILDING FUND 20

16,814.35

TRANSPORTATION FUND 40

91,752.67

SPECIAL CHECKS

27,366.57

CAPITAL PROJECTS 60

932.00

MUNICIPAL RETIREMENTTOTAL MAY 2026 BILLS PAYABLE

279,492.92

TOTAL MAY 2026 BILLS PAYABLE GROSSAPRIL 2026 PAYROLL, TRS, THIS, IMRF, FICA, MEDICARE

684,882.41

PRESIDENT

SECRETARY

PALOS HEIGHTS SCHOOL DISTRICT 128 VOUCHER

Voucher No: 1216

Voucher Date: 05/13/2026

Prepared By:

Printed: 05/06/2026 10:52:48 AM

PALOS HEIGHTS SCHOOL DISTRICT 128 is hereby authorized to draw warrants against PALOS HEIGHTS SCHOOL DISTRICT 128 funds for the sum of \$252,126.35 on account of obligations incurred for value received in services and for materials as shown below for period July 1, 2025 to June 30, 2026 (period cannot overlap fiscal year end.)

I certify that this claim is just and correct, and the services and/or materials herein represented have been received during the period listed above. All items are properly coded and not in excess of the budget.



PALOS HEIGHTS SCHOOL DISTRICT 128

Fund		Amount
10	EDUCATIONAL	\$142,627.33
20	OPERATIONS AND MAINTENANCE	\$16,814.35
40	TRANSPORTATION	\$91,752.67
60	CAPITAL PROJECTS	\$932.00
		\$252,126.35

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1216

05/13/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
4IMPRINT, INC.				
		10.5.1100.411.0000.00.00.00 Check #: 0	K-12 - SUPPLIES	\$2,480.87
			Vendor Total:	\$2,480.87
ACUTRANS				
		10.5.1800.300.0000.00.00.00 Check #: 0	BILINGUAL PROGRAMS - TRANSLATIONS	\$196.89
			Vendor Total:	\$196.89
ALLEGREEN GROUP				
		40.5.2550.333.0000.00.00.00 Check #: 0	SPECIAL EDUCATION TRANSPORTATION	\$31,950.00
			Vendor Total:	\$31,950.00
ALPHA SCHOOL BUS	2011			
		40.5.2550.333.0000.00.00.00 Check #: 0	SPECIAL EDUCATION TRANSPORTATION	\$29,551.99
			Vendor Total:	\$29,551.99
AMAZON CAPITAL SERVICES				
		10.5.1100.410.0000.02.00.00 Check #: 0	CONSUMABLES - INDEPENDENCE	\$23.61
		10.5.1100.411.0000.00.00.00 Check #: 0	K-12 - SUPPLIES	\$263.46
		10.5.1100.411.0000.01.00.00 Check #: 0	K-12 - SUPPLIES CHIPPEWA	\$399.00
		10.5.1100.411.0000.02.00.00 Check #: 0	K-12 - SUPPLIES INDEPENDENCE	\$534.16
		10.5.1100.411.0000.03.00.00 Check #: 0	K-12 - SUPPLIES - NAVAJO HEIGHTS	\$2,557.17
		10.5.1205.411.4620.05.00.00 Check #: 0	SPEC ED SUPPLIES IDEA GRANT	\$953.16
		10.5.1500.411.0000.02.00.00 Check #: 0	PHYS ED SUPPLIES - INDEPENDENCE	\$23.39
		10.5.1500.411.0000.03.00.00 Check #: 0	PHYS ED SUPPLIES - NAVAJO	\$906.67

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1216

05/13/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
AMBER MECHANICAL CONTRACTORS, INC. 9160		10.5.2320.411.0000.00.00.00 Check #: 0	EXECUTIVE ADMIN - SUPPLIES	\$35.98
		10.5.2660.411.0000.00.00.00 Check #: 0	DATA PROCESSING SERVICES- SUPPLIES	\$159.99
			Vendor Total:	\$5,856.59
APPLE COMPUTER INC	8012	20.5.2540.319.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE-OTHER PROF/TECH SERVICES	\$715.50
		10.5.2660.541.0000.00.00.00 Check #: 0	DATA PROCESSING SERVICES - REPLACEMENT EQUIPMENT	\$998.00
			Vendor Total:	\$715.50
BUSHUE BACKGROUND SCREENING		10.5.2310.314.0000.00.00.00 Check #: 0	BOARD OF EDUCATION -PROFESS SERVS/CONSULTANTS	\$37.00
			Vendor Total:	\$37.00
BUSINESSOLVER		10.5.1100.222.0000.00.00.00 Check #: 0	K-12 -MEDICAL INS	\$64.50
			Vendor Total:	\$64.50
C.J. ERICKSON PLUMBING CO.	16644	20.5.2540.323.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE-MTCE	\$1,585.21
			Vendor Total:	\$1,585.21
CANDOR HEALTH EDUCATION		10.5.1100.312.4400.05.00.00 Check #: 0	PROV DEV TITLE IV GRANT	\$1,395.00
			Vendor Total:	\$1,395.00
CDW GOVERNMENT, INC._11767	11767			

Palos Heights School District 128

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Fiscal Year: 2025-2026

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Vendor Remit Name	Vendor #	Account	Description	Amount
CITY FILMENTARY		10.5.2660.470.0000.00.00.00	DATA PROCESSING - SOFTWARE	\$275.48
		Check #: 0		
			Vendor Total:	\$275.48
CITY OF PALOS HEIGHTS	23899	10.5.1912.670.0000.00.00.00	SPEC ED K-12 PRIVATE TUITION	\$3,578.95
		Check #: 0		
			Vendor Total:	\$3,578.95
CORRECT ELECTRIC, INC.		20.5.2540.370.0000.00.00.00	OPERATION/MAINTENANCE-WATER/SEWER SERVICE	\$1,073.52
		Check #: 0		
			Vendor Total:	\$1,073.52
COUNTRY HOUSE RESTAURANT	11753	20.5.2540.342.0000.00.00.00	OPERATION/MAINTENANCE-ALARMS	\$425.00
		Check #: 0		
			Vendor Total:	\$425.00
DEMCO	9121	10.5.2560.315.0000.00.00.00	FOOD SERVICES CONTRACTED SERVICES	\$1,080.00
		Check #: 0		
		10.5.2560.490.0000.00.00.00	FREE AND REDUCED LUNCHES	\$10,273.25
		Check #: 0		
			Vendor Total:	\$11,353.25
EISENHOWER COOPERATIVE	2745	10.5.2220.411.0000.01.00.00	EDUCATION MEDIA - SUPPLIES CHIPPEWA	\$598.88
		Check #: 0		
		10.5.2220.411.0000.03.00.00	EDUCATION MEDIA - SUPPLIES NAVAJO HEIGHTS	\$598.63
		Check #: 0		
			Vendor Total:	\$1,197.51
		10.5.1912.670.0000.00.00.00	SPEC ED K-12 PRIVATE TUITION	\$4,444.28
		Check #: 0		
		10.5.2150.310.4620.05.00.00	AUDIOLOGY SERVICES IDEA GRANT	\$4,952.16
		Check #: 0		

Palos Heights School District 128

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Vendor Remit Name	Vendor #	Account	Description	Amount
ELIM CHRISTIAN SERVICES	4659			
		10.5.1912.670.0000.00.00.00 Check #: 0	SPEC ED K-12 PRIVATE TUITION	\$9,396.44
		10.5.2560.490.0000.00.00.00 Check #: 0	FREE AND REDUCED LUNCHES	\$11,704.38
		40.5.2550.333.0000.00.00.00 Check #: 0	SPECIAL EDUCATION TRANSPORTATION	\$171.00
				\$1,881.00
EVERGREEN MECHANICAL			Vendor Total:	\$13,756.38
		40.5.2550.333.0000.00.00.00 Check #: 0	SPECIAL EDUCATION TRANSPORTATION	\$2,980.15
EXPERT CHEMICAL & SUPPLY, INC.			Vendor Total:	\$2,980.15
		20.5.2540.411.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE- SUPPLIES	\$350.00
FAGEN FRIEDMAN & FULFROST, LLP			Vendor Total:	\$350.00
		10.5.2310.317.0000.00.00.00 Check #: 0	BOARD OF EDUCATION -LEGAL SERVICES	\$1,150.50
FRONTLINE TECHNOLOGIES GROUP			Vendor Total:	\$1,150.50
		10.5.2660.314.0000.00.62.00 Check #: 0	DATA PROCESSING- TECHNOLOGY & OPERATIONS	\$6,006.47
GOPHER SPORT			Vendor Total:	\$6,006.47
		10.5.1500.411.0000.04.00.00 Check #: 0	PHYS ED SUPPLIES - INDIAN HILL	\$267.46
GRAINGER	20681		Vendor Total:	\$267.46
		20.5.2540.411.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE- SUPPLIES	\$25.57

Palos Heights School District 128

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Vendor Remit Name	Vendor #	Account	Description	Amount
HANDPRINT MEDIA PRODUCTIONS		10.5.2310.314.0000.00.00.00 Check #: 0	BOARD OF EDUCATION –PROFESS SERVS/CONSULTANTS	Vendor Total: \$25.57
				\$2,860.00
HOH WATER TECHNOLOGY		20.5.2540.323.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE–MTCE	Vendor Total: \$2,860.00
				\$1,425.00
ILLINOIS SCHOOL BUS	242	40.5.2550.331.0000.00.00.00 Check #: 0	PUPIL TRANSPORTATION–PUPIL TRANSPORTATION	Vendor Total: \$1,425.00
				\$19,340.64
INSECT LORE		10.5.1100.411.0000.04.00.00 Check #: 0	K–12 – SUPPLIES – INDIAN HILL	Vendor Total: \$19,340.64
		10.5.1125.411.3705.00.00.00 Check #: 0	PRE K SUPPLIES PFA GRANT	\$87.00
JENNIFER STARTZ		10.5.1205.411.4620.05.00.00 Check #: 0	SPEC ED SUPPLIES IDEA GRANT	\$48.94
				Vendor Total: \$135.94
JESSICA GABRIEL		10.5.1100.411.0000.02.00.00 Check #: 0	K–12 – SUPPLIES INDEPENDENCE	\$15.83
				Vendor Total: \$15.83
LEAF		10.5.2660.360.0000.00.00.00 Check #: 0	DATA PROCESSING CAPITAL LEASE	Vendor Total: \$38.14
				\$38.14
				\$3,198.90
				Vendor Total: \$3,198.90

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1216

05/13/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
MENARDS INC	1008			
		20.5.2540.411.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE- SUPPLIES	\$286.12
MIDWEST PAPER RETRIEVER			Vendor Total:	\$286.12
		20.5.2540.321.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE-SANITATION SERVICES	\$217.60
NICOR GAS			Vendor Total:	\$217.60
		20.5.2540.465.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE-NATURAL GAS	\$3,016.95
PALOS SCHOOL DISTRICT 118			Vendor Total:	\$3,016.95
		40.5.2550.333.0000.00.00.00 Check #: 0	SPECIAL EDUCATION TRANSPORTATION	\$2,554.89
PETRARCA, GLEASON, BOYLE & IZZO, LLC			Vendor Total:	\$2,554.89
		10.5.2310.317.0000.00.00.00 Check #: 0	BOARD OF EDUCATION -LEGAL SERVICES	\$26.50
POSTMASTER-PALOS HEIGHTS	70		Vendor Total:	\$26.50
		10.5.2310.341.0000.00.00.00 Check #: 0	BOARD OF EDUCATION -POSTAGE	\$780.00
RADON DETECTION SPECIALISTS			Vendor Total:	\$780.00
		20.5.2540.319.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE-OTHER PROF/TECH SERVICES	\$1,344.00
REPUBLIC SERVICES			Vendor Total:	\$1,344.00
		20.5.2540.321.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE-SANITATION SERVICES	\$862.05

Palos Heights School District 128

Voucher Supplement Account Summary

Voucher Batch Number: 1216

05/13/2026

Fiscal Year: 2025-2026

Vendor Remit Name	Vendor #	Account	Description	Amount
RUSH DAY SCHOOL				
		10.5.1912.670.0000.00.00.00 Check #: 0	SPEC ED K-12 PRIVATE TUITION	\$862.05
		10.5.2560.490.0000.00.00.00 Check #: 0	FREE AND REDUCED LUNCHES	\$69,992.96
				\$555.36
SCHOOL HEALTH CORP.	3983		Vendor Total:	\$70,548.32
		10.5.1500.411.0000.04.00.00 Check #: 0	PHYS ED SUPPLIES - INDIAN HILL	\$44.17
SERTOMA SPEECH & HEARING CENTER	5222		Vendor Total:	\$44.17
		10.5.2150.310.4620.05.00.00 Check #: 0	AUDIOLOGY SERVICES IDEA GRANT	\$256.25
			Vendor Total:	\$256.25
SIOBHAN GAYDUK				
		10.5.1100.640.0000.00.00.00 Check #: 0	K-12 DUES AND FEES	\$226.00
			Vendor Total:	\$226.00
SMITHEREEN EXTERMINATING COMPANY	4755			
		20.5.2540.320.0000.00.00.00 Check #: 0	OPER & MAINT PROP SERVICES	\$487.00
			Vendor Total:	\$487.00
SN LANDSCAPING				
		20.5.2540.319.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE-OTHER PROF/TECH SERVICES	\$4,000.00
			Vendor Total:	\$4,000.00
SPECIAL EDUCATION SERVICES				
		10.5.1912.670.0000.00.00.00 Check #: 0	SPEC ED K-12 PRIVATE TUITION	\$5,729.32
			Vendor Total:	\$5,729.32

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1216

05/13/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
STAPLES ADVANTAGE_12999	12999			
		10.5.1100.411.0000.00.00.00 Check #: 0	K-12 - SUPPLIES	\$28.47
		10.5.1100.411.0000.01.00.00 Check #: 0	K-12 - SUPPLIES CHIPPEWA	\$1,693.63
		10.5.1100.411.0000.02.00.00 Check #: 0	K-12 - SUPPLIES INDEPENDENCE	\$297.17
			Vendor Total:	\$2,019.27
STUDIO GC ARCHITECTURE		60.5.2530.310.0000.00.00.00 Check #: 0	SITE AND BLD IMRPV ARCHITECT SERVICES	\$932.00
			Vendor Total:	\$932.00
TREERING CORPORATION		10.5.1100.419.0000.00.00.00 Check #: 0	K-12 -YEARBOOK	\$581.40
			Vendor Total:	\$581.40
UNIQUE PRODUCTS		20.5.2540.411.0000.00.00.00 Check #: 0	OPERATION/MAINTENANCE- SUPPLIES	\$1,000.83
			Vendor Total:	\$1,000.83
UNIVERSAL TAXI DISPATCH		40.5.2550.331.0000.00.00.00 Check #: 0	PUPIL TRANSPORTATION-PUPIL TRANSPORTATION	\$1,708.00
		40.5.2550.333.0000.00.00.00 Check #: 0	SPECIAL EDUCATION TRANSPORTATION	\$1,786.00
			Vendor Total:	\$3,494.00
WILSON LANGUAGE TRAINING.	8647	10.5.1100.411.0000.04.00.00 Check #: 0	K-12 - SUPPLIES - INDIAN HILL	\$37.00
			Vendor Total:	\$37.00

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1216

05/13/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
Grand Total:				\$252,126.35

End of Report

PALOS HEIGHTS SCHOOL DISTRICT 128 VOUCHER

Voucher No: 1195

Voucher Date: 04/07/2026

Prepared By:


Printed 05/06/2026 01:14:01 PM

PALOS HEIGHTS SCHOOL DISTRICT 128 is hereby authorized to draw warrants against PALOS HEIGHTS SCHOOL DISTRICT 128 funds for the sum of \$10,055.29 on account of obligations incurred for value received in services and for materials as shown below for period July 1, 2025 to June 30, 2026 (period cannot overlap fiscal year end.)

I certify that this claim is just and correct, and the services and/or materials herein represented have been received during the period listed above. All items are properly coded and not in excess of the budget.



PALOS HEIGHTS SCHOOL DISTRICT 128

Fund		Amount
10	EDUCATIONAL	\$9,999.31
20	OPERATIONS AND MAINTENANCE	\$55.98
		\$10,055.29

SPECIAL CHECKS DRAWN IN APRIL

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1195

04/07/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
AMAZON CAPITAL SERVICES				
		10.5.1100.411.0000.01.00.00 Check #: 45940	K-12 - SUPPLIES CHIPPEWA	\$807.55
		10.5.1100.411.0000.02.00.00 Check #: 45940	K-12 - SUPPLIES INDEPENDENCE	\$656.24
		10.5.1100.411.0000.03.00.00 Check #: 45940	K-12 -SUPPLIES - NAVAJO HEIGHTS	\$713.84
		10.5.1100.411.0000.04.00.00 Check #: 45940	K-12 - SUPPLIES - INDIAN HILL	\$284.06
		10.5.1125.411.3705.00.00.00 Check #: 45940	PRE K SUPPLIES PFA GRANT	\$293.07
		10.5.1205.411.4620.05.00.00 Check #: 45940	SPEC ED SUPPLIES IDEA GRANT	\$2,124.46
		10.5.1500.411.0000.01.00.00 Check #: 45940	PHYS ED SUPPLIES - CHIPPEWA	\$334.53
		10.5.2130.411.0000.00.00.00 Check #: 45940	HEALTH SERVICES- SUPPLIES	\$36.83
		10.5.2410.411.0000.04.00.00 Check #: 45940	OFFICE OF PRINCIPAL - SUPPLIES INDIAN HILL	\$59.87
		10.5.2660.411.0000.00.00.00 Check #: 45940	DATA PROCESSING SERVICES- SUPPLIES	\$46.00
Vendor Total:				\$5,356.45
BMO FINANCIAL GROUP				
		10.5.1100.411.0000.02.00.00 Check #: 45941	K-12 - SUPPLIES INDEPENDENCE	\$119.99
		10.5.1125.314.3705.00.00.00 Check #: 45941	PRE K PROF SERV PFA GRANT	\$766.85
		10.5.1125.411.3705.00.00.00 Check #: 45941	PRE K SUPPLIES PFA GRANT	\$1,399.96
		10.5.2210.314.4620.05.00.00 Check #: 45941	PROFESSIONAL DEV IDEA GRANT	\$183.82
		10.5.2310.341.0000.00.00.00 Check #: 45941	BOARD OF EDUCATION -POSTAGE	\$3.56

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1195

04/07/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
		10.5.2320.332.0000.00.00.00 Check #: 45941	EXECUTIVE ADMIN -TRAVEL/CONF	(\$205.00)
		10.5.2320.411.0000.00.00.00 Check #: 45941	EXECUTIVE ADMIN - SUPPLIES	\$75.72
		10.5.2410.411.0000.02.00.00 Check #: 45941	OFFICE OF PRINCIPAL-SUPPLIES-INDEPENDENCE	\$69.94
		10.5.2410.411.0000.03.00.00 Check #: 45941	OFFICE OF PRINCIPAL - SUPPLIES - NAVAJO HEIGHTS	\$84.11
		10.5.2660.332.0000.00.00.00 Check #: 45941	DATA PROCESSING -PROF. DEV TRAVEL/CONF	\$225.00
		10.5.2660.411.0000.00.00.00 Check #: 45941	DATA PROCESSING SERVICES- SUPPLIES	\$343.92
		10.5.2660.470.0000.00.00.00 Check #: 45941	DATA PROCESSING - SOFTWARE	\$164.00
		20.5.2540.411.0000.00.00.00 Check #: 45941	OPERATION/MAINTENANCE- SUPPLIES	\$55.98
			Vendor Total:	\$3,287.85
STAPLES ADVANTAGE_12999	12999	10.5.1100.411.0000.02.00.00 Check #: 45942	K-12 - SUPPLIES INDEPENDENCE	\$298.12
		10.5.2410.411.0000.04.00.00 Check #: 45942	OFFICE OF PRINCIPAL - SUPPLIES INDIAN HILL	\$1,112.87
			Vendor Total:	\$1,410.99
			Grand Total:	\$10,055.29

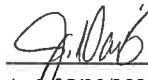
End of Report

PALOS HEIGHTS SCHOOL DISTRICT 128 VOUCHER

Voucher No: 1197

Voucher Date: 04/14/2026

Prepared By:


Printed: 05/06/2026 01:15:06 PM

PALOS HEIGHTS SCHOOL DISTRICT 128 is hereby authorized to draw warrants against PALOS HEIGHTS SCHOOL DISTRICT 128 funds for the sum of \$9,832.60 on account of obligations incurred for value received in services and for materials as shown below for period July 1, 2025 to June 30, 2026 (period cannot overlap fiscal year end.)

I certify that this claim is just and correct, and the services and/or materials herein represented have been received during the period listed above. All items are properly coded and not in excess of the budget.



PALOS HEIGHTS SCHOOL DISTRICT 128

Fund	Amount
10 EDUCATIONAL	\$9,832.60
	\$9,832.60

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1197

04/14/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
LOVE YOUR CLASSROOM LLC		10.5.2210.314.4620.05.00.00 Check #: 45988	PROFESSIONAL DEV IDEA GRANT	\$9,832.60
Vendor Total:				\$9,832.60
Grand Total:				\$9,832.60

End of Report

PALOS HEIGHTS SCHOOL DISTRICT 128 VOUCHER

Voucher No: 1205

Voucher Date: 04/21/2026

Prepared By:

Printed: 05/06/2026 01:15:57 PM

PALOS HEIGHTS SCHOOL DISTRICT 128 is hereby authorized to draw warrants against PALOS HEIGHTS SCHOOL DISTRICT 128 funds for the sum of \$440.00 on account of obligations incurred for value received in services and for materials as shown below for period July 1, 2025 to June 30, 2026 (period cannot overlap fiscal year end.)

I certify that this claim is just and correct, and the services and/or materials herein represented have been received during the period listed above. All items are properly coded and not in excess of the budget.



PALOS HEIGHTS SCHOOL DISTRICT 128

Fund	Amount
10 EDUCATIONAL	\$440.00
	\$440.00

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1205

04/21/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
SIGN STOP				
		10.5.1100.335.0000.02.00.00	K-12 FIELD TRIPS/ACTIVITIES/IND	\$440.00
		Check #: 46007		
			Vendor Total:	\$440.00
			Grand Total:	\$440.00

End of Report

PALOS HEIGHTS SCHOOL DISTRICT 128 VOUCHER

Voucher No: 1214

Voucher Date: 04/28/2026

Prepared By:


Printed: 05/06/2026 01:16:41 PM

PALOS HEIGHTS SCHOOL DISTRICT 128 is hereby authorized to draw warrants against PALOS HEIGHTS SCHOOL DISTRICT 128 funds for the sum of \$7,038.68 on account of obligations incurred for value received in services and for materials as shown below for period July 1, 2025 to June 30, 2026 (period cannot overlap fiscal year end.)

I certify that this claim is just and correct, and the services and/or materials herein represented have been received during the period listed above. All items are properly coded and not in excess of the budget.



PALOS HEIGHTS SCHOOL DISTRICT 128

Fund	Amount
10 EDUCATIONAL	\$7,038.68
	\$7,038.68

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1214

04/28/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
BMO FINANCIAL GROUP				
		10.5.1100.411.0000.02.00.00 Check #: 46029	K-12 - SUPPLIES INDEPENDENCE	\$444.64
		10.5.1100.411.0000.03.00.00 Check #: 46029	K-12 -SUPPLIES - NAVAJO HEIGHTS	\$75.00
		10.5.1100.411.0000.04.00.00 Check #: 46029	K-12 - SUPPLIES - INDIAN HILL	\$156.34
		10.5.2410.332.0000.00.00.00 Check #: 46029	OFFICE OF PRINCIPAL - TRAVEL/CONF	\$23.91
		10.5.2410.411.0000.02.00.00 Check #: 46029	OFFICE OF PRINCIPAL-SUPPLIES-INDEPENDENCE	\$226.20
		10.5.2410.411.0000.04.00.00 Check #: 46029	OFFICE OF PRINCIPAL - SUPPLIES INDIAN HILL	\$196.32
		10.5.2560.400.3705.00.00.00 Check #: 46029	FOOD SERVICES SUPPLIES PFA GRANT	\$1,161.13
		10.5.2660.323.0000.00.00.00 Check #: 46029	DATA PROCESSING SERVICES-REPAIRS	\$1,232.00
		10.5.2660.411.0000.00.00.00 Check #: 46029	DATA PROCESSING SERVICES- SUPPLIES	\$140.84
		10.5.2660.470.0000.00.00.00 Check #: 46029	DATA PROCESSING - SOFTWARE	\$20.00
		10.5.3000.410.3705.00.00.00 Check #: 46029	PARENT SUPPLIES PFA GRANT	\$876.80
Vendor Total:				\$4,553.18
CHICAGO GAELIC PARK				
		10.5.1100.335.0000.02.00.00 Check #: 46030	K-12 FIELD TRIPS/ACTIVITIES/IND	\$1,735.50
Vendor Total:				\$1,735.50
SOUND SONIC PROFESSIONAL ENTERTAINMENT				
		10.5.1100.335.0000.02.00.00 Check #: 46031	K-12 FIELD TRIPS/ACTIVITIES/IND	\$750.00
Vendor Total:				\$750.00

Palos Heights School District 128

Voucher Supplement Account Summary

Fiscal Year: 2025-2026

Voucher Batch Number: 1214

04/28/2026

Vendor Remit Name	Vendor #	Account	Description	Amount
Grand Total:				\$7,038.68

End of Report

Palos Heights School District 128

Fund Balances

Fiscal Year: 2025-2026

Month: April
 Year: 2026
 Fund Type: ☐ Include Cash Balance
☐ FY End Report

Fund	Description	Beginning Balance	Revenue	Expense	Transfers	Fund Balance
10	EDUCATIONAL	\$4,388,623.80	\$7,056,747.36	(\$8,768,500.48)	\$0.00	\$2,676,870.68
11	STUDENT ACTIVITY FUND	\$5,490.00	\$0.00	\$0.00	\$0.00	\$5,490.00
20	OPERATIONS AND MAINTENANCE	\$404,692.84	\$690,669.12	(\$949,370.81)	\$0.00	\$145,991.15
30	DEBT SERVICE	\$826,071.70	\$833,499.82	(\$1,321,465.00)	\$0.00	\$338,106.52
40	TRANSPORTATION	\$621,531.25	\$402,915.81	(\$544,293.27)	\$0.00	\$480,153.79
50	MUNICIPAL RETIREMENT	\$147,285.24	\$135,088.16	(\$150,977.45)	\$0.00	\$131,395.95
55	SOCIAL SECURITY	\$95,348.79	\$166,877.73	(\$193,396.41)	\$0.00	\$68,830.11
60	CAPITAL PROJECTS	\$5,750,317.65	\$11,934.49	(\$1,018,750.36)	\$0.00	\$4,743,501.78
70	WORKING CASH	\$2,697,415.68	\$107,448.48	\$0.00	\$0.00	\$2,804,864.16
80	TORT IMMUNITY	\$5,068.32	\$20.62	\$0.00	\$0.00	\$5,088.94
90	LIFE SAFETY	\$195.88	\$0.80	\$0.00	\$0.00	\$196.68
Grand Total:		\$14,942,041.15	\$9,405,202.39	(\$12,946,753.78)	\$0.00	\$11,400,489.76

End of Report

**District 128, Cook County
Palos Heights, Illinois**

BOARD MEETING MAY 13, 2026

Activity Fund Receipts and Expenses April 2026

	Balance 03/31/26	APRIL Receipts	APRIL Expenses	Balance 04/30/26
Indian Hill	610.34	\$4,566.40	\$2,653.40	\$2,523.34
Chippewa	\$657.80	\$1,349.10	\$0.00	\$2,006.90
Navajo	\$125.62	\$327.00	\$331.24	\$121.38
Independence				
IJHS	\$6,453.90	\$3,238.00	\$4,366.69	\$5,325.21
Cheerleaders	\$42.11	\$0.00	\$0.00	\$42.11
Drama	\$4,899.37	\$8,352.85	\$9,775.14	\$3,477.08
Lunch	\$0.00	\$0.00	\$0.00	\$0.00
Poms	\$146.55	\$0.00	\$0.00	\$146.55
Student Council	\$1,437.39	\$0.00	\$199.76	\$1,237.63
TOTAL	<u><u>\$13,762.74</u></u>	<u><u>\$17,833.35</u></u>	<u><u>\$17,326.23</u></u>	<u><u>\$14,269.86</u></u>



Palos Heights School District 128

12809 S. McVicker Ave • Palos Heights, IL 60463
Phone: (708) 597-9040 • Fax: (708) 597 9089 • www.palos128.org

Merryl B. Brownlow, Ed.D.
Superintendent

2026-2027 School Year

Board of Education Meeting Dates

Regular Board Meetings are held on Wednesdays

Meetings take place at 6:00 pm at Independence Junior High

No July 2026 Meeting

August 12, 2026 Regular Meeting

September 16, 2026 Regular Meeting

October 14, 2026 Regular Meeting

November 11, 2026 Regular Meeting

December 16, 2026 Regular Meeting

January 20, 2027 Regular Meeting

No February 2027 Meeting

March 17, 2027 Regular Meeting

April 21, 2027 Regular Meeting

May 19, 2027 Regular Meeting

June 16, 2027 Regular Meeting

INDIAN HILL
12800 S. Austin Ave
(708) 597-1285

CHIPPEWA
12425 S. Austin Ave
(708) 388-7260

NAVAJO HEIGHTS
12401 S. Oak Park Ave
(708) 385-3269

INDEPENDENCE JR. HIGH
6610 W. Highland Dr
(708) 448-0737

Offering the Trustees significant single audit experience

Since the passage of the Single Audit Act of 1984, Baker Tilly has recognized the importance of providing guidance to our clients in this highly complex, specialized area. Our firm currently performs more than 800 single audits each year and ranks in the top four nationally based on the number of audits conducted by CPA firms.

Our depth of experience with single audits places us in a leading position to perform high-quality single audits for the Trustees.

To stay on top of the changing requirements, our firm serves on various American Institute of Certified Public Accountants (AICPA) committees engaged in financial and single audit issues. We are frequently selected as speakers for nationally sponsored training courses, and we actively participate in industry sector events.

Our firm is also asked to review and comment on various single audit documents created by the AICPA and Office of Management and Budget (OMB) prior to their issuance. Below is a list of documents where we have provided contributions:

DOCUMENT	YEARS	ORGANIZATIONS
AICPA Audit Guide — GAS and Single Audits	2021 — 2025 2005 — 2016	AICPA
OMB Compliance Supplement	2008 — 2025	OMB
OMB Guidance for Federal Financial Assistance (Uniform Guidance) 2024 Revisions	2024	OMB

Single audit leadership

Baker Tilly conducts more than 800 single audits each year, ranking in the top four nationally based on the number of audits conducted by CPA firms.

Illinois school district/cooperative client list

Over the last several years, our public sector professionals have completed the audits of more than 100 different Illinois school districts. We have listed many of these schools on the list below for your reference; those in **bold** are ASBO Certificate of Excellence recipients.

ILLINOIS SCHOOL DISTRICT AUDITS	
Arlington Heights School District 25	Lake Bluff Elementary School District 65
Arlington Heights Township High School District 214	Leyden High School District 212
Argo Community High School District 217	Lombard Elementary School District 44
Benjamin School District 25	Lyons Elementary School District 103
Berkeley School District 87	Manheim School District 83
Brookfield School District 95	Maywood Melrose Broadview School District 89
Brookwood School District 167	North Chicago Community Unit School District 187
Champaign Community Unit School District 4	North Shore School District 112
Chicago Public Schools (School District 299)	Oak Park Elementary School District 97

INDUSTRY SPECIALIZATION AND QUALIFICATIONS

ILLINOIS SCHOOL DISTRICT AUDITS

Community Consolidated School District 21	Palatine Township High School District 211
Community Consolidated School District 46	Harvey School District 152
Community Consolidated School District 59	Posen-Robbins School District 143.5
Community Consolidated School District 93	Prairie-Hills Elementary School District 144
Community Unit School District 200	Oak Lawn-Hometown School District #123
Community Unit School District 308	Proviso Area for Exceptional Children School District 803
Community Unit School District 320	Proviso Township High School District 209
Cooperative Association for Special Education	Queen Bee School District 16
Crystal Lake School District 47	Reed Custer Community Unit School District 255U
DuPage Area Occupational Education System	Ridgewood High School District 234
East St. Louis School District 189	River Trails School District 26
Elmhurst Park School District 401	Rockford Public Schools School District 205
Evanston Community Consolidated School District 65	Rosemont Elementary School District 78
Evergreen Park Community High School District 231	South Holland School District 150
Exceptional Children Have Opportunities	South Holland School District 151
Glenbard Township High School District 87	Sunnybrook School District 171
Glencoe Elementary School District 35	Township High School District 113
Glen Ellyn School District 89	Warren Township High School District 121
Lake Zurich Community Unit School District 95	West Chicago High School District 94
Indian Springs School District 109	Westchester School District 92 1/2
LaGrange Highlands School District 106	Wilmette School District 39

Prioritizing industry involvement and knowledge sharing

To help the Trustees and member districts, prepare for and respond to change, we are actively involved in local and national associations. This keeps us on the leading edge of developments in our industry that may impact the Trustees. Our memberships in professional organizations and our involvement as authors, speakers, trainers and promoters of governmental accounting and auditing equip us to actively assist you with implementing new regulations and adopting new standards. Our active involvement enables us to provide the Trustees and member districts with timely and relevant industry information. It also allows us to serve as your resource as complex or routine accounting and auditing issues arise.

Sharing our technology to empower all of us

Technology takes us further when it's shared. It's why we'll provide the Trustees with the technology tools detailed below, boosting efficiency and value at every point along our path to success.

	HOW IT BENEFITS THE TRUSTEES
Assurance	Gain time-saving, industry-specialized templates and content
Research	See up-to-the-minute, relevant accounting pronouncements — and how we can apply them to your organization
Data conversion	Show your management team the linkage between risks, controls and procedures with intuitive, visually formatted data
Secure collaboration	Expect secure and seamless collaboration, visual presentations and remote check-ins.

SHARING OUR TECHNOLOGY INNOVATIONS WITH THE TRUSTEES

Every expedition requires the right tools. We bring them, providing technology to deliver efficiencies and value-added insights to the Trustees' and member district's engagement.

Co-developing a timeline to meet or beat the Trustees' and member district's deadlines

Your time is valuable, and one significant way we will support your goals is by delivering your services on time or ahead of schedule.

Below is an overview of our customized approach to successfully provide audit services to the Trustees and member districts. Our team will collaborate with you to co-develop an agreed-upon service timeline that meets your timing requirements. We are flexible with our fieldwork schedules and can adjust to fit the Trustees' needs.

	MAY/JUN	AUG/SEPT	OCT/NOV
ESTABLISH ENGAGEMENT OBJECTIVES			
Kick-off meeting with management			
Confirm audit scope, objectives and approach			
Planning meetings			
UNDERSTAND THE TRUSTEES AND ESTABLISH STRATEGY			
Develop an understanding of significant processes and internal controls			
Identify applicable key processes for assessment related to the significant risks identified during the risk assessment			
Review the accounting and reporting of financial transactions and examine the means used to identify, measure, classify and report on such information while determining if any area has potential risks of financial mismanagement			

SERVICE APPROACH

	MAY/JUN	AUG/SEPT	OCT/NOV
Review information technology system to determine if any area has a potential risk of financial mismanagement			
Review current documentation, including current laws, guidelines, policies and procedures presented by the Trustees and member districts			
Develop a detailed audit plan based upon identified risks and scope of engagement			
PERFORM AUDIT PROCEDURES			
Plan internal control testing and review test plan with the Trustees and member districts			
Document results in the risk and control matrix and identify deficiencies			
Document and review findings with the Trustees and member districts			
Obtain data and perform detailed testing			
Complete all necessary analysis			
Prepare drafts of financial statements			
Provide the Trustees and member districts with draft financial statements			
Provide the Trustees and member districts with a draft report on internal control and management letter, if necessary			
CONCLUDE THE AUDIT			
Finalize drafts and publish reports			
Present reports to the Trustees and member districts			
Distribute hard copies and electronic versions of reports as required by the RFP			
Closeout activities			

COMMITMENT TO SUCCESSFULLY DELIVER AUDIT SERVICES TO MEET THE TRUSTEES'S REQUIREMENTS

The Trustees' and member district's time is valuable. We will co-develop a timeline to provide the Trustees services on time or ahead of schedule.

Value for fees

When we say value, we mean achieving your objectives and imagining new ones. We mean sharing industry insights, gaining efficiencies and directing our best resources to the Trustees and member districts.

Sharing our transparent fee estimate

The Trustees' and member districts' fee estimates are based on what we've learned is important to you. We'll go beyond what's expected to deliver a return on your investment.

Summary Schedule of Fees:

ENTITY	JUNE 30, 2026	JUNE 30, 2027	JUNE 30, 2028	JUNE 30, 2029	JUNE 30, 2030
Worth Township School Treasurer's Office	\$71,400	\$74,900	\$78,719	\$82,655	\$86,788
Ridgeland School District #122	\$39,375	\$41,344	\$43,411	\$45,582	\$47,860
Atwood Heights School District #125	\$39,375	\$41,344	\$43,411	\$45,582	\$47,860
Alsip, Hazelgreen & Oak Lawn School District #126	\$39,375	\$41,344	\$43,411	\$45,582	\$47,860
Chicago Ridge School Districts #127.5	\$39,375	\$41,344	\$43,411	\$45,582	\$47,860
Palos Heights School District #128	\$39,375	\$41,344	\$43,411	\$45,582	\$47,860
Community High School District #218	\$61,950	\$65,048	\$68,300	\$71,715	\$75,301
Oak Lawn Community High School District #229	\$44,625	\$46,856	\$49,200	\$51,659	\$54,242
A.E.R.C. Special Education Cooperative	\$41,475	\$43,549	\$45,726	\$48,012	\$50,413
Moraine Area Career Systems (MACS)	\$26,775	\$28,114	\$29,520	\$30,995	\$32,545
TOTAL FOR ALL SERVICES	\$443,100	\$465,257	\$488,520	\$512,946	\$538,589

OUR TRANSPARENT, FAIR FEE ESTIMATE

The Trustees and member districts can expect a competitive fee arrangement and continuous value.

Our professional fees for services for the fiscal years ending June 30, 2023 through 2025 are included in the attached schedule.

Professional Fees	2023	2024	2025
Audit Services			
Worth Township School Treasurer's Office	\$ 99,800	\$ 106,800	\$ 113,300
Ridgeland School District #122	\$ 19,875	\$ 21,200	\$ 22,500
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
OMB Circular A-133 Single Audit Report	\$ 6,000	\$ 6,500	\$ 7,000
Oak Lawn-Hometown School District #123	\$ 36,500	\$ 39,000	\$ 41,500
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
OMB Circular A-133 Single Audit Report	\$ 8,000	\$ 8,500	\$ 9,000
Atwood Heights School District #125	\$ 18,895	\$ 20,300	\$ 21,500
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
OMB Circular A-133 Single Audit Report	\$ 6,000	\$ 6,500	\$ 7,000
Alsip, Hazelgreen & Oak Lawn School District #126	\$ 18,895	\$ 20,300	\$ 21,500
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
OMB Circular A-133 Single Audit Report	\$ 6,000	\$ 6,500	\$ 7,000
Chicago Ridge School District #127.5	\$ 18,895	\$ 20,300	\$ 21,500
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
OMB Circular A-133 Single Audit Report	\$ 6,000	\$ 6,500	\$ 7,000
Palos Heights School District #128	\$ 18,895	\$ 20,300	\$ 21,500
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
OMB Circular A-133 Single Audit Report	\$ 6,000	\$ 6,500	\$ 7,000
Community High School District #218	\$ 36,500	\$ 39,000	\$ 41,500
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
OMB Circular A-133 Single Audit Report	\$ 8,000	\$ 8,500	\$ 9,000
Oak Lawn Community High School District #229	\$ 19,875	\$ 21,200	\$ 22,500
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
OMB Circular A-133 Single Audit Report	\$ 6,000	\$ 6,500	\$ 7,000
A.E.R.O. Special Education Cooperative	\$ 17,500	\$ 18,700	\$ 19,800
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
GAGAS	\$ 2,500	\$ 2,750	\$ 3,000
Eisenhower Special Education Cooperative	\$ 17,500	\$ 18,700	\$ 19,800
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
GAGAS	\$ 2,500	\$ 2,750	\$ 3,000
Moraine Area Career Systems (MACS)	\$ 7,000	\$ 7,500	\$ 8,000
GATA reporting	\$ 1,000	\$ 1,100	\$ 1,200
GAGAS	\$ 2,500	\$ 2,750	\$ 3,000
TOTAL	\$ 400,630	\$ 429,650	\$ 457,100

As in prior years, the fee quote for the single audit assumes one major program will be tested. For each additional major program requiring testing, we will charge \$5,000 - \$6,000, depending on the complexity of the program. We will discuss with the various Districts if the need arises to test additional major programs prior to performing that testing for agreement. Additionally, implementation of new GASBs will be billed separately.

VALUE FOR FEES

Estimated Hours to Complete Fiscal Year June 30, 2026 Audit by Employee Position:

ENTITY	ASSOCIATE	SENIOR ASSOCIATE	MANAGER	PRINCIPAL	TOTAL HOURS
Worth Township School Treasurer's Office	150	175	100	30	455
Ridgeland School District # 22	100	120	40	10	270
Atwood Heights School District #125	100	120	40	10	270
Alsip, Hazelgreen & Oak Lawn School District #126	100	120	40	10	270
Chicago Ridge School Districts #127.5	100	120	40	10	270
Palos Heights School District #128	100	120	40	10	270
Community High School District #218	160	160	60	25	405
Oak Lawn Community High School District #229	120	120	50	10	300
A.E.R.O. Special Education Cooperative	120	120	40	10	290
Moraine Area Career Systems	80	80	25	5	190
TOTAL ESTIMATED HOURS	1130	1255	475	130	2990

When you invest in us, we invest in you

To help us forge this path together, we'll invest 400 hours (approximately \$60,000) in the startup phase, dedicating resources to deeply understand the Trustees and member districts — your goals, your culture, your challenges. This work is on us because we don't succeed unless you do.

Waiving transition fees

We will waive all fees associated with your transition process as a sign of our commitment to build a lasting relationship with you.

No unnecessary charges

You won't see add-on charges for routine calls, emails or quick consultations. They're included in our fees because we're here to earn your trust. If your need is out of scope, we'll never perform additional work unless you give us the go-ahead. Our final billing will always be based on the value we deliver to you.

Key assumptions

If any of the assumptions below change, we'll share any new requirements, budgetary considerations and options.

MEMO

Date: May 13, 2026

Re: New District Auditor

From: Kim Anoman, Business Manager

In recent years, our current auditor, RSM, has consistently missed reporting deadlines, citing staffing shortages and high turnover. To address these delays, Worth Township Treasurer collaboratively sought bids for a new auditing firm. Out of several firms contacted—including RSM, Baker Tilly, Wipfli, and Sikich—only Baker Tilly submitted a proposal.

Other districts using Baker Tilly have reported excellent service and timely completions.

Enclosed is information on Baker Tilly and the services that they will provide along with their schedule of fees.

Consequently, at the April 13th Township Meeting, it was voted to transition the eight affected districts to Baker Tilly, effective with the 2026 audit.

I recommend the Board approve Baker Tilly as our new district auditor.

Update Memo

Please distribute to board members and appropriate staff.

Contents

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Progress Report	p. 5
Revisions to Policies, Administrative Procedures, and Exhibits (numerical table)	p. 6
Next Issue: Five-Year Reviews	

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.
- 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.
- Click the  button on the top navigator bar. This will bring you to your account page
- Under "Quick Links," click on "PRESS Login."

PRESS

Policy Reference Education Subscription Service

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, djacobson@iasb.com; Jeremy Duffy, IASB Deputy Executive Director/General Counsel and Assistant **PRESS** Editor, jduffy@iasb.com; Maryam Brotine, Associate General Counsel and Assistant **PRESS** Editor, mbrotine@iasb.com; or Megan Mikhail, Assistant General Counsel and Assistant **PRESS** Editor, mmikhail@iasb.com.

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](#), available on IASB's website.

PRESS Bundles

Each 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 (Revisions Table) beginning on p. 6.

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.

Open Meetings Act and Freedom of Information Act

During the veto session, the 104th General Assembly passed legislation that amended the Open Meetings Act (OMA) and the Freedom of Information Act (FOIA). Public Act 104-438 adds “performance of active military duty as a service member” to the reasons a board member may attend a meeting remotely under OMA, and it prohibits boards from holding regular or special meetings on election days. P.A. 104-438 also adds “regional” to the types of association representatives that a public body can meet with in closed session to discuss self-evaluation, practices and procedures, or professional ethics. However, as we explained in the **PRESS** Issue 120 Update Memo, IASB is advocating for trailer bills (House Bill 4176 and Senate Bill 2715) that would remove or amend “regional” based on IASB’s concerns about ambiguity and legal risk, potential governance conflicts, and a lack of any demonstrated need for the expansion of this exception. Because we anticipate that this closed meeting exception could be amended again, this specific change is not reflected in the materials updated for this issue.

FOIA was amended by P.A. 104-438 in response to concerns about cyberattacks and requests generated by artificial intelligence. It now requires requesters to: (1) put their requests in the body of an email rather than in attachments, and (2) verify they are a person if a district has reason to believe they are not a person and requests the verification.

The following **PRESS** materials are updated in response to this legislation:

- 2:140-E, Guidance for Board Member Communications, Including Email Use
- 2:200, Types of School Board Meetings
- 2:220, School Board Meeting Procedure
- 2:250, Access to District Public Records
- 2:250-AP1, Access to and Copying of District Public Records
- 2:250-AP2, Protocols for Record Preservation and Development of Retention Schedules
- 2:250-E2, Immediately Available District Public Records and Web-Posted Reports and Records

Personnel

In response to concerns regarding the impact of federal immigration enforcement on employment, the General Assembly passed P.A. 104-455 during the veto session. It adds protections for employees if their employer receives a *no match* letter from a federal agency regarding a discrepancy in the individual’s identifying documents. Districts should consult their legal counsel if they receive such a letter to ensure compliance with the new requirements.

Also in the area of personnel, P.A. 104-259, effective 6-1-26, creates a new unpaid leave entitlement for employees whose child is a patient in a neonatal intensive care unit. This leave is in addition to leave that may also be available to employees under the federal Family and Medical Leave Act.

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 in response to these legal updates:

5:30, Hiring Process and Criteria

5:30-AP2, Investigations

5:250, Leaves of Absence

5:330, Sick Days, Vacation, Holidays, and Leaves

Student Records

In connection with the establishment of Illinois' *One Click College Admit* program, P.A. 104-15 expands the types of high school student directory information that school districts must share with military recruiters, State public institutions of higher education, and the Illinois Student Assistance Commission through a centralized data system. Beginning 7-1-26, these entities will have access to student birth dates, in addition to other directory information previously shared with them. Districts still need to provide parents/guardians with the opportunity to opt their children out of the release of this information.

The following **PRESS** materials are updated:

7:340-AP1, School Student Records

7:340-AP1, E1, Notice to Parents/Guardians and Students of Their Rights Concerning a Student's School Records

7:340-AP1, E3, Letter to Parents and Eligible Students Concerning Military Recruiters and Postsecondary Institutions Receiving Student Directory Information

7:340-AP1, E4, Frequently Asked Questions Regarding Military Recruiter Access to Students and Student Information

School Code Article 27 Reorganization (Continued)

P.A. 104-391, which passed during the 2025 spring legislative session, renumbered and reorganized many provisions in Article 27 of the School Code, which addresses instruction. Many items affected by P.A. 104-391 were updated in **PRESS** Issue 120, but due to the sheer volume of materials impacted, we continue to update materials in this issue.

The following **PRESS** materials are updated:

2:260, Uniform Grievance Procedure

2:265, Title IX Grievance Procedure

4:140-E4, Resolution to Increase Driver Education Fees

4:165, Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors

5:50, Drug- and Alcohol-Free Workplace, E-Cigarette, Tobacco, and Cannabis Prohibition

5:90-AP1, Coordination with Children's Advocacy Center

6:20-AP, Remote and/or Blended Remote Learning Day Plan(s)

6:50, School Wellness

6:65, Student Social and Emotional Development

6:100, Using Animals in the Educational Program

6:180, Extended Instructional Programs

7:20, Harassment of Students Prohibited

7:50, School Admissions and Student Transfers To and From Non-District Schools

7:100, Health, Eye, and Dental Examinations; Immunizations; and Exclusion of Students

7:185, Teen Dating Violence Prohibited

7:190-E2, Student Handbook Checklist

7:260, Exemption from Physical Education

7:285-AP, Anaphylaxis Prevention, Response, and Management Program

Title I Parent and Family Engagement

The federal Elementary and Secondary Education Act requires each district receiving Title I funds to develop, jointly with parents and family members of participating children, a written parent and family engagement policy. 20 U.S.C. §6318. This requirement has long been met through **PRESS** sample policy 6:170, *Title I Programs*, which mandates that the superintendent or designee develop district- and school-level parent and family engagement plans. Suggested components for these plans are contained in sample exhibits 6:170-AP1, E1, *District-Level Parent and Family Engagement Plan*, and 6:170-AP1, E2, *School-Level Parent and Family Engagement Plan*, which have both been renamed to more closely align with federal statutes and guidance, as well as terminology used by the Ill. State Board of Education (ISBE). These plans are incorporated into the policy by reference.

In January 2025, the U.S. Dept. of Education issued revised non-regulatory guidance titled *Parent and Family Engagement*,

which contains a sample template for a district-wide parent engagement policy and a sample template for a school-parent compact. Sample policy 6:170, *Title I Programs*, and its accompanying materials have been updated to ensure compatibility with the sample templates in Parent and Family Engagement and for continuous improvement.

Districts receiving a Title I, Part A allocation that are required to submit proof of parent and family engagement (PFE) compliance to ISBE as part of their FY 2027 Consolidated District Plan (CDP) will need to submit their adopted policy 6:170, *Title I Programs*, and both exhibits 6:170-AP1, E1, *District-Level Parent and Family Engagement Plan*, and 6:170-AP1, E2, *School-Level Parent and Family Engagement Plan*. Please note that the plans must be customized to reflect the district's actual Title I parent and family engagement activities. At the end of March, ISBE will offer a recorded webinar on CDPs that will include additional information on Title I requirements.

The following **PRESS** materials are updated:

- 6:170, Title I Programs
- 6:170-AP1, Checklist for Development, Implementation, and Maintenance of Parent and Family Engagement Compacts for Title I Programs
- 6:170-AP1, E1, District-Level Parent and Family Engagement PlanCompact – **RENAMED**

- 6:170-AP1, E2, School-Level Parent and Family Engagement PlanCompact – **RENAMED**
- 6:170-AP2, Notice to Parents Required by Elementary and Secondary Education, McKinney-Vento Homeless Assistance, and Protection of Pupil Rights Laws – **REFORMATTED**

Five-Year Reviews

PRESS Editors have a quality assurance goal to ensure that a review of each piece of the 1500+ page IASB **PRESS PRM** occurs once every five years. The **PRM** contains approximately 480 separate pieces of material, including policies, administrative procedures, and related exhibits.

The following **PRESS** materials are updated:

- 5:30-AP1, Interview Questions
- 5:30-AP2, E1, Notice of Preliminary Hiring Decision Based on Conviction Record
- 5:30-AP2, E2, Notice of Final Hiring Decision Based on Conviction Record
- 5:190-E1, Notice to Parents of Their Right to Request Their Child's Classroom Teachers' Qualifications
- 6:100-AP, Dissection of Animals
- 6:100-E1, Guidelines and Application for Using Animals

- in School Facilities for Educational Purposes
- 6:100-E2, Student Permission for Exposure to Animals
- 6:145, Migrant Students
- 6:235-AP1, E1, Student Authorization for Access to the District's Electronic Networks
- 6:235-AP1, E2, Staff Authorization for Access to the District's Electronic Networks
- 6:235-AP2, Web Publishing Guidelines
- 6:235-E3, Online Privacy Statement
- 7:220, Bus Conduct
- 7:230, Misconduct of Students with Disabilities
- 7:240, Conduct Code for Participants in Extracurricular Activities
- 7:280, Communicable and Chronic Infectious Disease
- 8:90, Parent Organizations and Booster Clubs

Miscellaneous

The following **PRESS** materials are updated due to legislation, administrative rule, and/or continuous improvement changes, including subscriber feedback.

- 2:150-AP, Superintendent Committees
- 2:200-AP, Types of School Board Meetings
- 4:40, Incurring Debt
- 4:170-AP6, E2, Notification to Staff and Parents/Guardians of CPR and AED Video

- 7:240-AP2, E1, Consent to Participate in Extracurricular Drug and Alcohol Testing Program
- 7:300, Extracurricular Athletics
- 7:300-E2, Certificate of Physical Fitness for Participation in Athletics
- 7:305-AP, Program for Managing Student Athlete Concussions and Head Injuries

PRESS Issue 121 Trivia

309 pages • 83,952 words • 63 PRM materials

Progress Report - The contents of this table frequently change.

Topic	Our Response
New Law Impacts Immigration Enforcement at Daycares Public Act 104-440 amended the Child Care Act to prohibit day care centers from sharing with any person, entity, or agency, the actual or perceived immigration status of a child or associated person, unless required by law. Licensed day care centers are required to adopt policies and provide training for interacting with enforcement agents and notifying parents if a law enforcement agent for civil immigration requests a child's personally identifiable information. For any school districts managing day care centers, a policy template is provided for day care centers through the Ill. Dept. of Early Childhood at: https://idec.illinois.gov/immigration-rights/day-care-safety.html.	No PRESS materials are affected.
U.S. Dept. Of Education Releases Updated Guidance on Prayer and Religious Expression in Schools In February 2026, the U.S. Dept. of Education issued an updated version of its guidance, <i>Constitutionally Protected Prayer and Religious Expression in Public Elementary and Secondary Schools</i>, available at: 2026-guidance-constitutionally-protected-prayer-and-religious-expression-public-elementary-and-secondary-schools-113182.pdf. The guidance states that public school employees can engage in visible, personal prayer, even if students voluntarily participate in the prayer. However, school officials and employees cannot deliver prayers on behalf of the school or in situations where students are unable to opt out. Districts should consult their board attorneys if they have questions about the impact of this updated guidance on their current practices.	Affected PRESS materials, including sample policies 6:70, <i>Teaching About Religions</i>, 7:130, <i>Student Rights and Responsibilities</i>, and 7:330, <i>Student Use of Buildings - Equal Access</i>, will be updated in a future PRESS issue.
Duplicate Citations for 105 ILCS 5/22-105 Will Be Addressed in General Revisory Bill Senate Bill 3731 has been filed in part to fix duplicate citations to 105 ILCS 5/22-105. The change in numbering will occur in the <i>Safe Schools For All Act</i>, which is proposed to change to 105 ILCS 5/22-106. Instances of this citation for the <i>Safe Schools for All Act</i> within the materials for Issue 121 include the phrase "(final citation pending)."	Affected PRESS materials, including sample policy 6:145, <i>Migrant Students</i>, and materials in the 7:150 suite, will be updated in the fall issue.

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

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

DELETED. This material has been deleted from 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.

***PRM Style Update Note:** For purposes of continuous improvement, the **PRESS** editors are working to improve consistency in the use of italics across the **PRM**. Generally, italics are utilized in the **PRM** to indicate:

- the first instance of a term of art or defined term in a material
- when a term is actually being defined
- **PRM** material titles
- names of publications and government programs
- laws with colloquial names (a/k/a)
- emphasis of a particular word or phrase
- instructions within the body of a material

Specific changes to the italicization of words in the body of a particular policy, procedure, or exhibit are not addressed in the Revisions Table, but they can be found in the Committee Worksheets available at **PRESS** Online.

Revisions to Policies, Administrative Procedures, and Exhibits

Number and Title	Revision Descriptions	
2:140-E, Guidance for Board Member Communications, Including Email Use	The exhibit is updated in response to the Freedom of Information Act (FOIA), 5 ILCS 140/2, amended by P.A. 104-438, excluding <i>junk mail</i> from the definition of <i>public record</i> , and for continuous improvement.	☐
2:150-AP, Superintendent Committees	The procedure is updated in response: 23 Ill.Admin.Code §228.30, amended by 49 Ill.Reg. 9475, addressing requirements for the transitional bilingual education parent advisory committee; - The renaming of 6:170-AP1, E1, <i>District-Level Parent and Family Engagement PlanCompact</i>; and - Continuous improvement.	☐
2:200, Types of School Board Meetings	The policy, Cross References, and footnotes are updated. The policy is updated with minor style changes. The footnotes are updated in response to the Open Meetings Act (OMA), 5 ILCS 120/2.07(a), added by P.A. 104-438, prohibiting public bodies from holding regular or special meetings on an election day, and for continuous improvement. An option regarding the posting location for special meetings is added to footnote 19. A minor title correction is made to 2:210, <i>Organizational School Board Meetings</i> , in the Cross References.	☐
2:200-AP, Types of School Board Meetings	The procedure is updated to align with the option added to footnote 19 in 2:200, <i>Types of School Board Meetings</i> .	☐
2:220, School Board Meeting Procedure	The policy, Cross References, and footnotes are updated. The policy and footnotes are updated in response to OMA, 5 ILCS 120/7(a), adding performance of <i>active military duty</i> as a <i>service member</i> as a reason a board member may attend a meeting remotely, and for continuous improvement. A Cross Reference to 2:110, <i>Qualifications, Term, and Duties of Board Officers</i> , is added.	☐

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

2:250, Access to District Public Records	The policy, Legal References, and footnotes are updated. The policy and footnotes are updated in response to: 1. Freedom of Information Act (FOIA), 5 ILCS 140/3, amended by P.A. 104-438, requiring requests for public records be made in the body of an e-mail, and permitting public bodies to ask a requester to verify that they are a person; 2. FOIA, 5 ILCS 140/2, amended by P.A. 104-438, revising the definition of <i>public record</i> to exclude <i>junk mail</i>; and 3. Continuous improvement. The Legal References are updated for continuous improvement.	☐
2:250-AP1, Access to and Copying of District Public Records	The procedure is updated for the reasons stated in 2:250, <i>Access to District Public Records</i>, above, and in response to FOIA, 5 ILCS 140/4, eliminating the requirement for a district with a website to also post a description of itself and how to request its public records at its offices.	☐
2:250-AP2, Protocols for Record Preservation and Development of Retention Schedules	The procedure is updated in response to Local Records Act, 50 ILCS 205/3, amended by P.A. 104-438, revising the definition of <i>public record</i> to exclude <i>junk mail</i>, and for continuous improvement.	☐
2:250-E2, Immediately Available District Public Records and Web-Posted Reports and Records	The exhibit is updated in response to: 1. FOIA, 5 ILCS 140/4, amended by P.A. 104-438, eliminating the requirement for a district with a website to also post a description of itself and how to request its public records at its offices; 2. ISBE's <i>Understanding Type I Diabetes for Parents and Guardians</i>; and 3. Continuous improvement.	☐
2:260, Uniform Grievance Procedure	The Legal References and footnotes are updated in response to 105 ILCS 5/22-110, renumbered by P.A. 104-391, and for continuous improvement.	☐
2:265, Title IX Grievance Procedure	The policy is unchanged. The footnotes are updated in response to 105 ILCS 5/27-215(a)(4) and 5/27-240, both renumbered by P.A. 104-391.	☐
4:40, Incurring Debt	The policy is unchanged. The footnotes are updated in response to 105 ILCS 5/19-1(p-235), renumbered by P.A. 104-417, and 105 ILCS 5/20-2, amended by P.A. 103-591, authorizing an increase of up to 3% of a bond issue to cover certain bond-related expenses.	☐
4:140-E4, Resolution to Increase Driver Education Fees	The exhibit is updated in response to 105 ILCS 5/27-815, titled <i>safety education; driver education course</i>, (formerly 105 ILCS 5/27-24.2), renumbered by P.A. 104-391, and for continuous improvement.	☐
4:165, Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors	The policy, Legal References, and footnotes are updated in response to the repeal of 105 ILCS 5/27-13.2, by P.A. 104-391, which formerly required districts to give parents/guardians of students in grades K-8 prior written notice of sexual abuse prevention instruction. The Legal References and footnotes are updated in response to 105 ILCS 5/27-215 and 5/27-1015, both renumbered by P.A. 104-391. The policy and footnotes are also updated for continuous improvement.	☐
4:170-AP6, E2, Notification to Staff and Parents/Guardians of CPR and AED Video	The exhibit is updated with a new Ill. High School Association (IHSA) web address.	☐
5:30, Hiring Process and Criteria	The policy and footnotes are updated for continuous improvement. The footnotes are also updated in response to 820 ILCS 55/13-25, added by P.A. 104-455, prohibiting employers from taking adverse action against an employee based only on the receipt of a notice of discrepancy (a <i>no-match</i> letter).	☐

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

5:30-AP1, Interview Questions	The procedure is updated in response to a five-year review.	☐
5:30-AP2, Investigations	The procedure is updated in response to 820 ILCS 55/13-25, added by P.A. 104-455, prohibiting employers from taking adverse action against an employee based only on the receipt of a notice of discrepancy (a <i>no-match</i> letter), and for continuous improvement.	☐
5:30-AP2, E1, Notice of Preliminary Hiring Decision Based on Conviction Record	The exhibit is updated in response to a five-year review.	☐
5:30-AP2, E2, Notice of Final Hiring Decision Based on Conviction Record	The exhibit is updated in response to a five-year review.	☐
5:50, Drug- and Alcohol-Free Workplace; E-Cigarette, Tobacco, and Cannabis Prohibition	The policy and footnotes are updated for continuous improvement. The footnotes are also updated in response to: 1. P.A. 104-391, renumbering and repealing citations in 105 ILCS 5/27; and 2. 105 ILCS 5/22-81 (a/k/a <i>Louie's Law</i>), added by P.A. 103-399, requiring ISBE and the Ill. Dept. of Human Services to develop and regularly update a comprehensive <i>Substance Use Prevention and Recovery Instruction Resource Guide</i> for public elementary and secondary schools across the State of Illinois.	☐
5:90-AP1, Coordination with Children's Advocacy Center	The procedure is updated in response to 105 ILCS 5/27-240, renumbered by P.A. 104-391, and for continuous improvement.	☐
5:190-E1, Notice to Parents of Their Right to Request Their Child's Classroom Teachers' Qualifications	The exhibit is unchanged in response to a five-year review.	☐
5:250, Leaves of Absence	The policy, Legal References, and footnotes are updated in response to the Family Neonatal Intensive Care Leave Act, 820 ILCS 157/, added by P.A. 104-259, eff. 6-1-26, allowing employees to take a specified amount of unpaid leave if their child is a patient in a neonatal intensive care unit. The policy and footnotes are also updated for continuous improvement.	☐
5:330, Sick Days, Vacation, Holidays, and Leaves	The policy, Legal References, and footnotes are updated for the reasons stated in 5:250, <i>Leaves of Absence</i> , above.	☐
6:20-AP, Remote and/or Blended Remote Learning Day Plan(s)	The procedure is updated in response to P.A. 104-391, renumbering citations throughout 105 ILCS 5/27, and for continuous improvement.	☐
6:50, School Wellness	The policy, Legal References, and footnotes are updated. The policy and Legal References are updated with minor style changes. The footnotes are updated in response to: 1. 105 ILCS 5/27-215 and 5/27-235, added by P.A. 104-391, replacing, in part, 105 ILCS 110/3 and 110/3.5; 2. P.A. 104-391, renumbering and reorganizing various provisions throughout 105 ILCS 5/27; 3. Farm Fresh Schools Program Act, 105 ILCS 24/, and State Finance Act, 30 ILCS 105/5.728, both repealed by P.A. 104-435, eliminating the Farm Fresh Schools Program and its related funding; and 4. Continuous improvement.	☐

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

6:65, Student Social and Emotional Development	The policy, Legal References, and footnotes are updated for continuous improvement. The footnotes are also updated in response to 105 ILCS 5/27-1080, renumbered by P.A. 104-391.	☐
6:100, Using Animals in the Educational Program	The Legal References are updated in response to 105 ILCS 5/27-265, renumbered by P.A. 104-391, and for continuous improvement.	☐
6:100-AP, Dissection of Animals	The procedure is updated in response to a five-year review.	☐
6:100-E1, Guidelines and Application for Using Animals in School Facilities for Educational Purposes	The exhibit is updated in response to a five-year review.	☐
6:100-E2, Student Permission for Exposure to Animals	The exhibit is unchanged in response to a five-year review.	☐
6:145, Migrant Students	The policy, Cross References, and footnotes are updated in response to a five-year review. The footnotes are also updated in response to 105 ILCS 5/22-105 (final citation pending), added by P.A. 104-288, requiring schools to protect the integrity of school learning environments for all children so that no parent is discouraged from sending and no child is discouraged from attending school, including from the threat of immigration enforcement on a school campus.	☐
6:170, Title I Programs	The policy, Legal References, Cross References, and footnotes are updated. The policy and footnotes are updated to more closely align with federal statutes and guidance and terminology used by ISBE, and to ensure compatibility with the U.S. Dept. of Education's revised non-regulatory guidance. The Legal References and Cross References are updated for continuous improvement.	☐
6:170-AP1, Checklist for Development, Implementation, and Maintenance of Parent and Family Engagement Compacts for Title I Programs	The procedure is updated to ensure compatibility with the U.S. Dept. of Education's revised non-regulatory guidance and for continuous improvement.	☐
6:170-AP1, E1, District-Level Parent and Family Engagement <u>PlanCompact</u>	RENAMED. The exhibit is renamed and updated to more closely align with federal statutes and guidance and terminology used by ISBE, and to ensure compatibility with the U.S. Dept. of Education's revised non-regulatory guidance.	☐
6:170-AP1, E2, School-Level Parent and Family Engagement <u>PlanCompact</u>	RENAMED. The exhibit is renamed and updated for the reasons stated in 6:170-AP1, E1, <i>District-Level Parent and Family Engagement Plan</i> , above.	☐
6:170-AP2, Notice to Parents Required by Elementary and Secondary Education, McKinney-Vento Homeless Assistance, and Protection of Pupil Rights Laws	REFORMATTED. The exhibit is updated in response to a five-year review.	☐

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

6:180, Extended Instructional Programs	The policy, Legal References and footnotes are updated. The policy is updated with minor style changes. The Legal References and footnotes are updated in response to: 105 ILCS 5/27-255, added by P.A. 104-391, replacing, in part, 105 ILCS 110/3; - P.A. 104-391, renumbering and reorganizing various provisions throughout 105 ILCS 5/27. The footnotes are also updated for continuous improvement.	☐
6:235-AP1, E1, Student Authorization for Access to the District's Electronic Networks	The exhibit is updated in response to a five-year review.	☐
6:235-AP1, E2, Staff Authorization for Access to the District's Electronic Networks	The exhibit is updated in response to a five-year review.	☐
6:235-AP2, Web Publishing Guidelines	The procedure is updated in response to a five-year review.	☐
6:235-E3, Online Privacy Statement	The exhibit is updated in response to a five-year review.	☐
7:20, Harassment of Students Prohibited	The Legal References and footnotes are updated in response to 105 ILCS 5/22-110, renumbered by P.A. 104-391. The footnotes are also updated for continuous improvement.	☐
7:50, School Admissions and Student Transfers To and From Non-District Schools	The policy, Legal References, Cross References, and footnotes are updated. The policy is updated with minor style changes. The Legal References and footnotes are updated in response to: 105 ILCS 5/22-105 (final citation pending), added by P.A. 104-288, prohibiting the denial of a free public education to every child in Illinois; and 105 ILCS 5/22-105, titled <i>Health examinations and immunizations</i> (formerly 105 ILCS 5/27-8.1), renumbered by P.A. 104-391. The footnotes are also updated for continuous improvement. 7:150, <i>Agency and Law Enforcement Requests</i>, is added to the Cross References.	☐
7:100, Health, Eye, and Dental Examinations; Immunizations; and Exclusion of Students	The Legal References and footnotes are updated in response to 105 ILCS 5/22-105, titled <i>Health examinations and immunizations</i> (formerly 105 ILCS 5/27-8.1), renumbered by P.A. 104-391. The footnotes are also updated for continuous improvement.	☐
7:185, Teen Dating Violence Prohibited	The policy, Legal References, and footnotes are updated. The policy and footnotes are updated for continuous improvement. The Legal References and footnotes are also updated in response to 105 ILCS 5/27-240, renumbered by P.A. 104-391.	☐

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

7:190-E2, Student Handbook Checklist	The exhibit is updated in response to: 105 ILCS 5/27-13.2, repealed by P.A. 104-391, resulting in the renaming of 6:60-AP1, E1, <i>Requests to Examine Materials and Statutory Opt-outs</i>; 775 ILCS 5/1-103(Q), added by P.A. 103-785, adding <i>reproductive health decisions</i> to the list of prohibited bases of discrimination; 105 ILCS 5/22-87(b), amended by P.A. 104-13, requiring notice to students in grade 12 of the Free Application for Federal Student Aid (FAFSA) designee available to answer questions; 105 ILCS 5/10-19.05, added by P.A. 104-250, requiring publicly posted attendance policies to include the career development experiences that may count toward the calculation of clock hours of schoolwork; 105 ILCS 5/10-20.5a(b-5), added by P.A. 104-15, requiring notice to students and parents/guardians, at the time of school registration or at other appropriate times prior to the end of a student's junior year, of the student's right to have direct admission information sent to the Ill. Student Assistance Commission and other approved entities under the Public University Direct Admission Program Act; 105 ILCS 5/26A-20(d), 26A-40(h), added by P.A. 102-466, <i>a/k/a Ensuring Success in School Law</i>, requiring notice of revised policies to respond to students who are parents, expectant parents, or victims of domestic or sexual violence, including also providing notice annually to all school personnel and students 12 years of age and older of the availability of counseling without parent/guardian consent; - The renaming of 6:170-AP1, E1, <i>District-Level Parent and Family Engagement Plan Compact</i>; and - Continuous improvement.	☐
7:220, Bus Conduct	The policy, Legal References, and footnotes are updated in response to a five-year review. The Legal References are updated with minor style changes.	☐
7:230, Misconduct by Students with Disabilities	The policy, Legal References, and footnotes are updated in response to a five-year review. The Legal References are updated with a minor style change.	☐
7:240, Conduct Code for Participants in Extracurricular Activities	The Legal References and footnotes are updated in response to 105 ILCS 5/27-255(d), renumbered by P.A. 104-391, and for continuous improvement.	☐
7:240-AP2, E1, Consent to Participate in Extracurricular Drug and Alcohol Testing Program	The exhibit is updated with a new IHSA web address, and for continuous improvement.	☐
7:260, Exemption from Physical Education	The policy, Legal References, and footnotes are updated in response to a five-year review. The policy is updated with minor style changes. The Legal References and footnotes are updated in response to 105 ILCS 5/27-710, renumbered by P.A. 104-391. The footnotes are also updated for continuous improvement.	☐
7:280, Communicable and Chronic Infectious Diseases	The Legal References and footnotes are updated in response to a five-year review. The Legal References are updated with a minor style change.	☐
7:285-AP, Anaphylaxis Prevention, Response, and Management Program	The procedure is updated in response to: 105 ILCS 5/2-3.190, amended by P.A. 104-391, reflecting the repeal of the Critical Health Programs and Comprehensive Health Education Act; 105 ILCS 5/22-110, titled <i>bullying prevention</i> (formerly 105 ILCS 5/27-23.7), renumbered by P.A. 104-391; and - Continuous improvement.	☐

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

7:300, Extracurricular Athletics	The policy, Legal References, and footnotes are updated for continuous improvement. The footnotes are also updated in response to an IHSA website update.	☐
7:300-E2, Certificate of Physical Fitness for Participation in Athletics	The exhibit is updated for the reasons stated in 7:300, <i>Extracurricular Athletics</i> , above.	☐
7:305-AP, Program for Managing Student Athlete Concussions and Head Injuries	The procedure is updated for the reasons stated in 7:300, <i>Extracurricular Athletics</i> , above.	☐
7:340-AP1, School Student Records	The procedure is updated in response to: 1. 105 ILCS 5/10-20.5a, amended by P.A. 104-15, adding student birth dates to the types of directory information that districts must share with military recruiters, public institutions of higher education, and the Ill. Student Assistance Commission, through a centralized data system; 2. 105 ILCS 5/27-605, renumbered by P.A. 104-391, addressing State graduation requirements; and 3. Continuous improvement.	☐
7:340-AP1, E1, Notice to Parents/Guardians and Students of Their Rights Concerning a Student's School Records	The exhibit is updated for the reasons stated in 7:340-AP1, <i>School Student Records</i> , above.	☐
7:340-AP1, E3, Letter to Parents and Eligible Students Concerning Military Recruiters and Postsecondary Institutions Receiving Student Directory Information	The exhibit is updated in response to 105 ILCS 5/10-20.5a, amended by P.A. 104-15, adding student birth dates to the types of directory information that districts must share with military recruiters, public institutions of higher education, and the Ill. Student Assistance Commission, through a centralized data system, and for continuous improvement.	☐
7:340-AP1, E4, Frequently Asked Questions Regarding Military Recruiter Access to Students and Student Information	The exhibit is updated for the reasons stated in 7:340-AP1, E3, <i>Letter to Parents and Eligible Students Concerning Military Recruiters and Postsecondary Institutions Receiving Student Directory Information</i> , above.	☐
8:90, Parent Organizations and Booster Clubs	The policy and footnotes are updated in response to a five-year review.	☐

Acknowledgement to PRESS Advisory Board

The **P**olicy **R**eference **E**ducation **S**ubscription **S**ervice (**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.

— **Debra Jacobson, Jeremy Duffy, Maryam Brotine, Megan Mikhail**

Charles Watkins, Associate Director/General Counsel, Illinois Association of School Administrators

Brian Schwartz, Deputy Executive Director & General Counsel, Illinois Principals Association

Heather K. Brickman, Attorney, Hodges, Loizzi, Eisenhammer, Rodick & Kohn LLP

Dr. Kimberly C. Chambers, Executive Director, Illinois Association of School Personnel Administrators; Director of Human Resources, Adlai E. Stevenson High School District 125

Teri Engler, Attorney, Engler Callaway Baasten & Sraga, LLC

Dr. Dale R. Fisher, Assistant Superintendent for Human Resources, Deerfield Public Schools District 109

Yashekia Goldsmith, General Counsel, Rockford School District 205

Stephanie E. Jones, Attorney, Fagen Friedman & Fulfroast LLP

Maureen Lemon, Attorney, Ottosen DiNolfo Hasenbalg & Castaldo, Ltd

Kathy Marshall, Assistant Superintendent, Bureau-Henry-Stark ROE 28

Steve Miller, Assistant Superintendent of Business Operations, Schaumburg CCSD 54

David G. Penn, Attorney, Schmiedeskamp, Robertson, Neu & Mitchell LLP

Merry Rhoades, Attorney, Tueth, Keeney, Cooper, Mohan & Jackstadt P.C.

M. Curt Richardson, Attorney, McLean County Unit District 5

Caroline Roselli, Attorney, Robbins Schwartz

Wayne Savageau, former IASB Policy Consultant, and former Superintendent

Dr. Glenn A. Wood, Superintendent, Plainfield Community Consolidated School District 202

IASB Staff Members, especially Policy Services Directors and select Outreach and Training and Governmental Relations Directors

Special Acknowledgement to IASB Legal Assistants

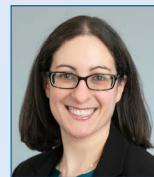
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Ummehani Faizullahbhoj, Office of General Counsel, preparation, formatting, quality assurance, editor, State and federal regulations monitor

Michael Ifkovits, Office of General Counsel, preparation, formatting, quality assurance, editor, State and federal regulations monitor

Maggie Gibson, Office of General Counsel, preparation, formatting, quality assurance, editor, State and federal regulations monitor

Office of General Counsel



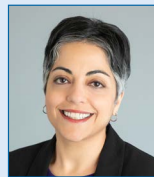
Debra Jacobson

PRESS Editor,
Associate General Counsel
(ext. 1211) djacobson@iasb.com



Jeremy Duffy

Assistant PRESS Editor,
Deputy Executive Director
and General Counsel
(ext. 1234) jduffy@iasb.com



Maryam Brotine

Assistant PRESS Editor,
Associate General Counsel
and Director, Diversity, Equity
& Inclusion Services
(ext. 1219) mbrotine@iasb.com



Megan Mikhail

Assistant PRESS Editor,
Assistant General Counsel,
(ext. 1215) mmikhail@iasb.com



Ummehani Faizullahbhoj

Assistant Director,
Office of General Counsel
(ext. 1227) ufaizullahbhoj@iasb.com



Michael Ifkovits

Legal Assistant,
Office of General Counsel
(ext. 1237) mifkovits@iasb.com



Maggie Gibson

Legal Assistant,
Office of General Counsel
(ext. 1236) mgibson@iasb.com

SECTION 2 - BOARD OF EDUCATION

2:200 Types of Board of Education Meetings

General

For all meetings of the Board of Education and its committees, the Superintendent or designee shall satisfy all notice and posting requirements contained herein as well as in the Open Meetings Act. This shall include mailing meeting notifications to news media that have officially requested them and to others as approved by the Board. Unless otherwise specified, all meetings are held in the District's main office. Board policy 2:220, *Board of Education Meeting Procedure*, governs meeting quorum requirements.

The Superintendent is designated on behalf of the Board and each Board committee to receive the training on compliance with the Open Meetings Act that is required by Section 1.05(a) of that Act. The Superintendent may identify other employees to receive the training. In addition, each Board member must complete a course of training on the Open Meetings Act as required by Section 1.05(b) or (c) of that Act.

Regular Meetings

The Board announces the time and place for its regular meetings at the beginning of each fiscal year. The Superintendent shall prepare and make available the calendar of regular Board meetings. The regular meeting calendar may be changed with 10 days' notice in accordance with State law.

A meeting agenda shall be posted at the District's main office and the Board's meeting room, or other location where the meeting is to be held, at least 48 hours before the meeting.

Closed Meetings

The Board and Board committees may meet in a closed meeting to consider the following subjects:

1. The appointment, employment, compensation, discipline, performance, or dismissal of specific employees, specific individuals who serve as independent contractors in a park, recreational, or educational setting, or specific volunteers of the public body or legal counsel for the public body, including hearing testimony on a complaint lodged against an employee, a specific individual who serves as an independent contractor

in a park, recreational, or educational setting, or a volunteer of the public body or against legal counsel for the public body to determine its validity. However, a meeting to consider an increase in compensation to a specific employee of a public body that is subject to the Local Government Wage Increase Transparency Act may not be closed and shall be open to the public and posted and held in accordance with [the Open Meetings Act]. [5 ILCS 120/2\(c\)\(1\)](#)

2. Collective negotiating matters between the public body and its employees or their representatives, or deliberations concerning salary schedules for one or more classes of employees. [5 ILCS 120/2\(c\)\(2\)](#).
3. The selection of a person to fill a public office, as defined in the Open Meetings Act, including a vacancy in a public office, when the public body is given power to appoint under law or ordinance, or the discipline, performance or removal of the occupant of a public office, when the public body is given power to remove the occupant under law or ordinance. [5 ILCS 120/2\(c\)\(3\)](#).
4. Evidence or testimony presented in open hearing, or in closed hearing where specifically authorized by law, to a quasi-adjudicative body, as defined in the Open Meetings Act, provided that the body prepares and makes available for public inspection a written decision setting forth its determinative reasoning. [5 ILCS 120/2\(c\)\(4\)](#).
5. Evidence or testimony presented to the Board regarding denial of admission to school events or property pursuant to [105 ILCS 5/24-24](#), provided that the Board prepares and makes available for public inspection a written decision setting forth its determinative reasoning. [5 ILCS 120/2\(c\)\(4.5\)](#).
6. The purchase or lease of real property for the use of the public body, including meetings held for the purpose of discussing whether a particular parcel should be acquired. [5 ILCS 120/2\(c\)\(5\)](#).
7. The setting of a price for sale or lease of property owned by the public body. [5 ILCS 120/2\(c\)\(6\)](#).
8. The sale or purchase of securities, investments, or investment contracts. [5 ILCS 120/2\(c\)\(7\)](#).
9. Security procedures, school building safety and security, and the use of personnel and equipment to respond to an actual, a threatened, or a reasonably potential danger to the safety of employees, students, staff, the public, or public property. [5 ILCS 120/2\(c\)\(8\)](#).
10. Student disciplinary cases. [5 ILCS 120/2\(c\)\(9\)](#).
11. The placement of individual students in special education programs and other matters relating to individual students. [5 ILCS 120/2\(c\)\(10\)](#).
12. Litigation, when an action against, affecting or on behalf of the particular public body has been filed and is pending before a court or administrative tribunal, or when the

public body finds that an action is probable or imminent, in which case the basis for the finding shall be recorded and entered into the minutes of the closed meeting. [5 ILCS 120/2\(c\)\(11\)](#).

13. The establishment of reserves or settlement of claims as provided in the Local Governmental and Governmental Employees Tort Immunity Act, if otherwise the disposition of a claim or potential claim might be prejudiced, or the review or discussion of claims, loss or risk management information, records, data, advice or communications from or with respect to any insurer of the public body or any intergovernmental risk management association or self insurance pool of which the public body is a member. [5 ILCS 120/2\(c\)\(12\)](#).
14. Self evaluation, practices and procedures or professional ethics, when meeting with a representative of a statewide association of which the public body is a member. [5 ILCS 120/2\(c\)\(16\)](#).
15. Discussion of minutes of meetings lawfully closed under the Open Meetings Act, whether for purposes of approval by the body of the minutes or semi-annual review of the minutes as mandated by Section 2.06. [5 ILCS 120/2\(c\)\(21\)](#).
16. Meetings between internal or external auditors and governmental audit committees, finance committees, and their equivalents, when the discussion involves internal control weaknesses, identification of potential fraud risk areas, known or suspected frauds, and fraud interviews conducted in accordance with generally accepted auditing standards of the United States of America. [5 ILCS 120/2\(c\)\(29\)](#).

The Board may hold a closed meeting, or close a portion of a meeting, by a majority vote of a quorum, taken at an open meeting. The vote of each Board member present, and the reason for the closed meeting, will be publicly disclosed at the time of the meeting and clearly stated in the motion and the meeting minutes.

A single motion calling for a series of closed meetings may be adopted when such meetings will involve the same particular matters and are scheduled to be held within 3 months of the vote.

No final Board action will be taken at a closed meeting.

Reconvened or Rescheduled Meetings

A meeting may be rescheduled or reconvened. Public notice of a rescheduled or reconvened meeting shall be given in the same manner as that for a special meeting, except that no public notice is required when the original meeting is open to the public and: (1) is to be reconvened within 24 hours, or (2) an announcement of the time and place of the reconvened meeting was made at the original meeting and there is no change in the agenda.

Special Meetings

Special meetings may be called by the President or by any three members of the Board by giving notice thereof, in writing, stating the time, place, and purpose of the meeting to remaining Board members by mail at least 48 hours before the meeting, or by personal service at least 24 hours before the meeting.

Public notice of a special meeting is given by posting a notice at the District's main office^{Q1} at least 48 hours before the meeting and by notifying the news media that have filed a written request for notice. A meeting agenda shall accompany the notice.

All matters discussed by the Board at any special meeting must be related to a subject on the meeting agenda.

Emergency Meetings

Public notice of emergency meetings shall be given as soon as practical, but in any event, before the meeting to news media that have filed a written request for notice.

Posting on the District Website

In addition to the other notices specified in this policy, the Superintendent or designee shall post the following on the District website: (1) the annual schedule of regular meetings, which shall remain posted until the Board approves a new schedule of regular meetings; (2) a public notice of all Board meetings; and (3) the agenda for each meeting which shall remain posted until the meeting is concluded.

LEGAL REF.:

[5 ILCS 120/](#), Open Meetings Act.

[5 ILCS 140/](#), Freedom of Information Act.

[105 ILCS 5/10-6](#) and [5/10-16](#).

CROSS REF.: 2:110 (Qualifications Term, and Duties of Board Officers), 2:120 (Board Member Development), 2:210 (Organizational Board of Education Meetings), 2:220 (Board of Education Meeting Procedure), 2:230 (Public Participation at Board of Education Meetings and Petitions to the Board), 6:235 (Access to Electronic Networks), 8:30 (Visitors to and Conduct on School Property)

ADOPTED: January 24, 2024

Questions

- Q1. Some attorneys find the Open Meetings Act's (OMA's) posting requirements for special meetings to be unclear and recommend that a board post notices and agendas of such meetings at the district's main office *and* at the location where the meeting is to be held. Consult the board attorney for guidance on this issue and ensure that posting practices align with this policy and administrative procedure 2:200-AP, *Types of School Board Meetings*. Posting at the meeting location promotes greater transparency.

Does the Board post notices and agendas for special meetings at the location where the meeting is to be held, in addition to posting at the district's main office? If yes, note that this policy may require posting in the same manner for reconvened and rescheduled meetings, in alignment with OMA.

Options

- ☐ No (Default)
- ☒ Yes (IASB will revise this sentence after "the District's main office" to add "and the location where the meeting is to be held")

Document Status: Draft Update

Recommend as presented - legal updates
Q1 - Discussion items from residents must be unanimously approved to add to agenda. Typical practice would be to consider for next meeting and not add since public comment is at the end of our meetings.
Q2 - Not recommending to take a roll call vote for every action item. Current practice is only when required.

SECTION 2 - BOARD OF EDUCATION

2:220 Board of Education Meeting Procedure

Agenda

The Board of Education President is responsible for focusing the Board meeting agendas on appropriate content. The Superintendent shall prepare agendas in consultation with the Board President. The President shall designate a portion of the agenda as a consent agenda for those items that usually do not require extensive discussion before Board action. Upon the request of any Board member, an item will be withdrawn from the consent agenda and placed on the regular agenda for independent consideration.

Each Board meeting agenda shall contain the general subject matter of any item that will be the subject of final action at the meeting. Any Board member may submit suggested agenda items to the Board President for his or her consideration for an upcoming meeting. District residents may suggest inclusions for the agenda.^{Q1} The Board will take final action only on items contained in the posted agenda; items not on the agenda may still be discussed.

The Superintendent shall provide a copy of the agenda, with adequate data and background information, to each Board member at least 48 hours before each meeting, except a meeting held in the event of an emergency. The meeting agenda shall be posted in accordance with Board policy 2:200, *Types of Board of Education Meetings*.

The Board President shall determine the order of business at regular Board meetings. Upon consent of a majority of members present, the order of business at any meeting may be changed.

Voting Method

Unless otherwise provided by law, when a vote is taken upon any measure before the Board, with a quorum being present, a majority of the votes cast shall determine its outcome. A vote of *abstain* or *present*, or a vote other than *yea* or *nay*, or a failure to vote, is counted for the purposes of determining whether a quorum is present. A vote of *abstain* or *present*, or a vote other than *yea* or *nay*, or a failure to vote, however, is not counted in determining whether a measure has been passed by the Board, unless otherwise stated in law. The sequence for casting votes is rotated.

On all questions involving the expenditure of money and on all questions involving the closing of a meeting to the public, a roll call vote^{Q2} shall be taken and entered in the Board's minutes. An individual Board member may request that a roll call vote be taken on any other matter; the President or other presiding officer may approve or deny the request but a denial is subject to being overturned by a majority vote of the members present.

Any Board member may include a written explanation of his or her vote in the District file containing individual Board member statements; the explanation will not be part of the minutes.

Minutes

The Board Secretary shall keep written minutes of all Board meetings (whether open or closed), which shall be signed by the President and the Secretary. The minutes include:

1. The meeting's date, time, and place;
2. Board members recorded as either present or absent;
3. A summary of the discussion on all matters proposed, deliberated, or decided, and a record of any votes taken;
4. On all matters requiring a roll call vote, a record of who voted *yea* and *nay*;
5. If the meeting is adjourned to another date, the time and place of the adjourned meeting;
6. The vote of each member present when a vote is taken to hold a closed meeting or portion of a meeting, and the reason for the closed meeting with a citation to the specific exception contained in the Open Meetings Act (OMA) authorizing the closed meeting;
7. A record of all motions, including individuals making and seconding motions;
8. Upon request by a Board member, a record of how he or she voted on a particular motion; and
9. The type of meeting, including any notices and, if a reconvened meeting, the original meeting's date.

The minutes shall be submitted to the Board for approval or modification at its next regularly scheduled open meeting. Minutes for open meetings must be approved within 30 days after the meeting or at the second subsequent regular meeting, whichever is later.

Every six months, or as soon after as is practicable, in an open meeting, the Board: (1) reviews minutes from all closed meetings that are currently unavailable for public release, and (2) determines which, if any, no longer require confidential treatment and are available for public inspection. This is also referred to as a *semi-annual review*. The Board may meet

in a prior closed session to review the minutes from closed meetings that are currently unavailable for public release, but it reports its determination in open session.

The Board's meeting minutes must be submitted to the Board Treasurer at such times as the Treasurer may require.

The official minutes are in the custody of the Board Secretary. Open meeting minutes are available for inspection during regular office hours within 10 days after the Board's approval; they may be inspected in the District's main office, in the presence of the Secretary, the Superintendent or designee, or any Board member.

Minutes from closed meetings are likewise available, but only if the Board has released them for public inspection, except that Board members may access closed session minutes not yet released for public inspection (1) in the District's administrative offices or their official storage location, and (2) in the presence of a records secretary, an administrative official of the public body, or any elected official of the public body. The minutes, whether reviewed by members of the public or the Board, shall not be removed from the District's administrative offices or their official storage location except by vote of the Board or by court order.

The Board's open meeting minutes shall be posted on the District website within 10 days after the Board approves them; the minutes will remain posted for at least 60 days.

Verbatim Record of Closed Meetings

The Superintendent, or the Board Secretary when the Superintendent is absent, shall audio record all closed meetings. If neither is present, the Board President or presiding officer shall assume this responsibility. After the closed meeting, the person making the audio recording shall label the recording with the date and store it in a secure location. The Superintendent shall ensure that: (1) an audio recording device and all necessary accompanying items are available to the Board for every closed meeting, and (2) a secure location for storing closed meeting audio recordings is maintained within the District's main office.

After 18 months have passed since being made, the audio recording of a closed meeting is destroyed provided the Board approved: (1) its destruction, and (2) minutes of the particular closed meeting.

Individual Board members may access verbatim recordings in the presence of a records secretary, an administrative official of the public body, or any elected official of the public body. Access to the verbatim recordings is available at the District's administrative offices or the verbatim recording's official storage location. Requests shall be made to the Superintendent or Board President. While a Board member is listening to a verbatim recording, it shall not be re-recorded or removed from the District's main office or official

storage location, except by vote of the Board or by court order.

Before making such requests, Board members should consider whether such requests are germane to their responsibilities, service to District, and/or Oath of Office in policy 2:80, *Board Member Oath and Conduct*. In the interest of encouraging free and open expression by Board members during closed meetings, the recordings of closed meetings should not be used by Board members to confirm or dispute the accuracy of recollections.

Quorum and Participation by Audio or Video Means

A quorum of the Board must be physically present at all Board meetings. A majority of the full membership of the Board constitutes a quorum.

Provided a quorum is physically present, a Board member may attend a meeting by video or audio conference if he or she is prevented from physically attending because of: (1) personal illness or disability, (2) employment or District business, (3) a family or other emergency, or (4) unexpected childcare obligations, or (5) performance of active military duty as a service member.^{C1} If a member wishes to attend a meeting by video or audio means, he or she must notify the recording secretary or Superintendent at least 24 hours before the meeting unless advance notice is impractical. The recording secretary or Superintendent will inform the Board President and make appropriate arrangements. A Board member who attends a meeting by audio or video means, as provided in this policy, may participate in all aspects of the Board meeting including voting on any item.

No Physical Presence of Quorum and Participation by Audio or Video; Disaster Declaration

The ability of the Board to meet in person with a quorum physically present at its meeting location may be affected by the Governor or the Director of the Ill. Dept. of Public Health issuing a disaster declaration related to a public health emergency. The Board President or, if the office is vacant or the President is absent or unable to perform the office's duties, the Vice President determines that an in-person meeting or a meeting conducted under the **Quorum and Participation by Audio or Video Means** subhead above, is not practical or prudent because of the disaster declaration; if neither the President nor Vice President are present or able to perform this determination, the Superintendent shall serve as the duly authorized designee for purposes of making this determination.

The individual who makes this determination for the Board shall put it in writing, include it on the Board's published notice and agenda for the audio or video meeting and in the meeting minutes, and ensure that the Board meets every OMA requirement for the Board to meet by video or audio conference without the physical presence of a quorum.

Rules of Order

Unless State law or Board-adopted rules apply, the Board President, as the presiding officer, will use the most recent edition of Robert's Rules of Order Newly Revised, as a guide when a question arises concerning procedure.

Broadcasting and Recording Board Meetings

Any person may record or broadcast an open Board meeting. Special requests to facilitate recording or broadcasting an open Board meeting, such as seating, writing surfaces, lighting, and access to electrical power, should be directed to the Superintendent at least 24 hours before the meeting.

Recording meetings shall not distract or disturb Board members, other meeting participants, or members of the public. The Board President may designate a location for recording equipment, may restrict the movements of individuals who are using recording equipment, or may take such other steps as are deemed necessary to preserve decorum and facilitate the meeting.

LEGAL REF.:

[5 ILCS 120/2a](#), [120/2.02](#), [120/2.05](#), [120/2.06](#), and [120/7](#), Open Meetings Act.

[105 ILCS 5/10-6](#), [5/10-7](#), [5/10-12](#), and [5/10-16](#).

CROSS REF.: 2:80 (Board Member Oath and Conduct), 2:150 (Committees), 2:200 (Types of Board of Education Meetings), 2:210 (Organizational Board of Education Meeting), 2:230 (Public Participation at Board of Education Meetings and Petitions to the Board)

ADOPTED: January 24, 2024

Palos Heights SD 128

PRESSPlus Comments

- C1. Updated in response to the Open Meetings Act (OMA), 5 ILCS 120/7(a), amended by P.A. 104-438. OMA borrows the definition for *active military duty* from the Service Member Employment and Reemployment Act, 330 ILCS 61/1-10. 5 ILCS 120/7(a), amended by P.A. 104-438. It means any full-time military service regardless of length or voluntariness, including, but not limited to, annual training, full-time National Guard Duty, and State active duty. 330 ILCS 61/1-10. *Service member* means a resident of Illinois who is a member of any component of the U.S. Armed Forces or the National Guard of any state, D.C., a commonwealth, or territory of the U.S. **Issue 121, March 2026**
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Questions

- Q1. The Board may restrict addition of discussion items suggested by District residents to the agenda to the beginning of a regular meeting and/or upon unanimous approval of those board members present.

Does the Board want to add restrictions regarding addition of discussion items suggested by District residents to the agenda?

Options

- ☐ No (Default)
- ☐ Yes, restrict to the beginning of a regular meeting. (IASB will add the following sentence: Discussion items suggested by District residents may be added to the agenda at the beginning of a regular meeting.)
- ☒ Yes, restrict to upon unanimous approval of those board members present. (IASB will add the following sentence: Discussion items suggested by District residents may be added to the agenda upon unanimous approval of those Board members present.)
- ☐ Yes, restrict to the beginning of a regular meeting upon unanimous approval of those board members present. (IASB will add the following sentence: Discussion items suggested by District residents may be added to the agenda at the beginning of a regular meeting upon unanimous approval of those Board members present.)

- Q2. Does the Board take a roll call vote on *all* action items?

Options

- ☒ No (Default)
- ☐ Yes (IASB will replace this paragraph with the following sentence: The Board shall take a roll call vote on all matters requiring its action, including but not limited to, all questions involving the expenditure of money and all questions involving the closing of a meeting to the public.)

SECTION 2 - BOARD OF EDUCATION

2:250 Access to District Public Records

Full access to the District's *public records* is available to any person as provided in the Illinois Freedom of Information Act (FOIA), this policy, and implementing procedures. The Superintendent or designee shall: (1) provide the Board with sufficient information and data to permit the Board to monitor the District's compliance with FOIA and this policy, and (2) report any FOIA requests during the Board's regular meetings along with the status of the District's response.

Freedom of Information Officer

The Superintendent shall serve as the District's Freedom of Information Officer and assumes all the duties and powers of that office as provided in FOIA and this policy. The Superintendent may delegate these duties and powers to one or more designees, but the delegation shall not relieve the Superintendent of the responsibility for the delegated action that was delegated.

Definition

The District's *public records* are defined as records, reports, forms, writings, letters, memoranda, books, papers, maps, photographs, microfilms, cards, tapes, recordings, electronic data processing records, electronic communications, recorded information and all other documentary material pertaining to the transaction of public business, regardless of physical form or characteristics, having been prepared by or for, or having been or being used by, received by, in the possession of, or under the control of the School District. The District's public records do not include *junk mail*.^{C1}

Requesting Records

A request for inspection and/or copies of public records must be made in writing and may be submitted by personal delivery, mail, telefax, or email directed to the District's Freedom of Information Officer. Individuals making a request are not required to state a reason for the request other than to identify when the request is for a commercial purpose or when requesting a fee waiver. Email requests must include the entirety of the request within the body of the email and not as an attachment or hyperlink.^{C2} The Superintendent or designee shall instruct District employees to immediately forward any request for inspection and

copying of a public record to the District's Freedom of Information Officer or designee.

Responding to Requests

The Freedom of Information Officer shall approve all requests for public records unless:

1. The requested material does not exist;
2. The requested material is exempt from inspection and copying by the Freedom of Information Act; **or**
3. Complying with the request would be unduly burdensome; **or**
4. The request would require the District to open electronically attached files or hyperlinks to view or access details of a request. In that case, the requester shall be notified within five business days that the entirety of the electronic request must appear within the body of the electronic submission; **or**
5. The District has a reasonable belief that the request was not submitted by a person, and the requester fails to verify orally or in writing that they are a person within 30 days of the District's request for such verification. ^{C3}

Within five business days after receipt of a request for access to a public record, the Freedom of Information Officer shall comply with or deny the request, unless the time for response is extended as specified in Section 3 of FOIA. The Freedom of Information Officer may extend the time for a response for up to five business days from the original due date. If an extension is needed, the Freedom of Information Officer shall: (1) notify the person making the request of the reason for the extension, and (2) either inform the person of the date on which a response will be made, or agree with the person in writing on a compliance period.

The time periods are extended for responding to requests for records made for a *commercial purpose*, requests by a *recurrent requester*, or *voluminous requests*, as those terms are defined in Section 2 of FOIA. The time periods for responding to those requests are governed by Sections 3.1, 3.2, and 3.6 of FOIA.

When responding to a request for a record containing both exempt and non-exempt material, the Freedom of Information Officer shall redact exempt material from the record before complying with the request.

Fees

Persons making a request for copies of public records must pay any and all applicable fees. The Freedom of Information Officer shall establish a fee schedule that complies with FOIA and this policy and is subject to the Board's review. The fee schedule shall include copying

fees and all other fees to the maximum extent they are permitted by FOIA, including without limitation, search and review fees for responding to a request for a *commercial purpose* and fees, costs, and personnel hours in connection with responding to a *voluminous request*.

Copying fees, except when fixed by statute, shall be reasonably calculated to reimburse the District's actual cost for reproducing and certifying public records and for the use, by any person, of its equipment to copy records. In no case shall the copying fees exceed the maximum fees permitted by FOIA. If the District's actual copying costs are equal to or greater than the maximum fees permitted by FOIA, the Freedom of Information Officer is authorized to use FOIA's maximum fees as the District's fees. No copying fees shall be charged for: (1) the first 50 pages of black and white, letter or legal sized copies, or (2) electronic copies other than the actual cost of the recording medium, except if the response is to a *voluminous request*, as defined in FOIA.

A fee reduction is available if the request qualifies under Section 6 of FOIA. The Freedom of Information Officer shall set the amount of the reduction taking into consideration the amount of material requested and the cost of copying it.

Provision of Copies and Access to Records

A public record that is the subject of an approved access request will be available for inspection or copying at the District's administrative office during regular business hours, unless other arrangements are made by the Freedom of Information Officer.

Many public records are immediately available from the District's website including, but not limited to, the process for requesting a public record. The Freedom of Information Officer shall direct a requester to the District's website if a requested record is available there. If the requester is unable to reasonably access the record online, he or she may resubmit the request for the record, stating his or her inability to reasonably access the record online, and the District shall make the requested record available for inspection and copying as otherwise provided in this policy.

Preserving Public Records

Public records, including email messages, shall be preserved and cataloged if: (1) they are evidence of the District's organization, function, policies, procedures, or activities, (2) they contain informational data appropriate for preservation, (3) their retention is required by State or federal law, or (4) they are subject to a retention request by the Board Attorney (e.g., a litigation hold), District auditor, or other individual authorized by the Board of Education or State or federal law to make such a request. Unless its retention is required as described in items numbered 3 or 4 above, a public record, as defined by the Illinois Local Records Act, may be destroyed when authorized by the Local Records Commission.

LEGAL REF.:

[5 ILCS 140/](#), Illinois Freedom of Information Act.

[50 ILCS 205/](#), Local Records Act.

105 ILCS 5/10-16 and 5/24A-7.1.

820 ILCS 40/11, [Personnel Record Review Act](#).

820 ILCS 130/5, [Prevailing Wage Act](#).

CROSS REF.: 2:140 (Communications To and From the Board), 5:150 (Personnel Records), 7:340 (Student Records)

ADOPTED: January 25, 2023

Palos Heights SD 128

PRESSPlus Comments

- C1. Updated in response to the Freedom of Information Act (FOIA), 5 ILCS 140/2, amended by P.A. 104-438. *Junk mail* means any unsolicited commercial mail or commercial electronic communication sent to a district and not responded to by a district. **Issue 121, March 2026**
- C2. Updated in response to FOIA, 5 ILCS 140/3(c), amended by P.A. 104-438. **Issue 121, March 2026**
- C3. Updated in response to FOIA, 5 ILCS 140/3(j), added by P.A. 104-438. **Issue 121, March 2026**

Document Status: Draft Update

SECTION 2 - BOARD OF EDUCATION

2:260 Uniform Grievance Procedure

A student, parent/guardian, employee, or community member should notify any District Complaint Manager if one believes that the Board of Education, its employees, or its agents have violated his or her rights guaranteed by the [State](#) or federal [Constitution](#), State or federal statute, or Board policy, or has a complaint regarding any one of the following:

1. Title II of the Americans with Disabilities Act, [42 U.S.C. §12101 et seq.](#)
2. Title IX of the Education Amendments of 1972, [20 U.S.C. §1681 et seq.](#), excluding Title IX complaints governed by Board policy 2:265, *Title IX Grievance Procedure*
3. Section 504 of the Rehabilitation Act of 1973, [29 U.S.C. §791 et seq.](#)
4. Discrimination and/or harassment on the basis of race, color, or national origin prohibited by the Illinois Human Rights Act, [775 ILCS 5/](#); Title VI of the Civil Rights Act of 1964, [42 U.S.C. §2000d et seq.](#); and/or Title VII of the Civil Rights Act of 1964, [42 U.S.C. §2000e et seq.](#) (see Board policy 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*)
5. Title VII of the Civil Rights Act of 1964, [42 U.S.C. §2000e et seq.](#) (see also number 4, above, for discrimination and/or harassment on the basis of race, color, or national origin)
6. Sexual harassment prohibited by the State Officials and Employees Ethics Act, [5 ILCS 430/70-5\(a\)](#); Illinois Human Rights Act, [775 ILCS 5/](#); and Title VII of the Civil Rights Act of 1964, [42 U.S.C. §2000e et seq.](#) (Title IX sexual harassment complaints are addressed under Board policy 2:265, *Title IX Grievance Procedure*)
7. Breastfeeding accommodations for students, [105 ILCS 5/10-20.60](#)
8. Bullying, [105 ILCS 5/27-23.7](#)
9. Misuse of funds received for services to improve educational opportunities for educationally disadvantaged or deprived children
10. Curriculum, instructional materials, and/or programs
11. Victims' Economic Security and Safety Act, [820 ILCS 180/](#)
12. Illinois Equal Pay Act of 2003, [820 ILCS 112/](#)
13. Provision of services to homeless students
14. Illinois Whistleblower Act, [740 ILCS 174/](#)
15. Misuse of genetic information prohibited by the Illinois Genetic Information Privacy

Act, [410 ILCS 513/](#); and Titles I and II of the Genetic Information Nondiscrimination Act, [42 U.S.C. §2000ff](#) *et seq.*

16. Employee Credit Privacy Act, [820 ILCS 70/](#).

The Complaint Manager will first attempt to resolve complaints without resorting to this grievance procedure. If a formal complaint is filed under this policy, the Complaint Manager will address the complaint promptly and equitably. A student and/or parent/guardian filing a complaint under this policy may forego any informal suggestions and/or attempts to resolve it and may proceed directly to this grievance procedure. The Complaint Manager will not require a student or parent/guardian complaining of any form of harassment to attempt to resolve allegations directly with the accused (or the accused's parent(s)/guardian(s)); this includes mediation.

Right to Pursue Other Remedies Not Impaired

The right of a person to prompt and equitable resolution of a complaint filed under this policy shall not be impaired by the person's pursuit of other remedies, e.g., criminal complaints, civil actions, etc. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies and use of this grievance procedure does not extend any filing deadline related to the pursuit of other remedies. If a person is pursuing another remedy subject to a complaint under this policy, the District will continue with a simultaneous investigation under this policy.

Deadlines

All deadlines under this policy may be extended by the Complaint Manager as he or she deems appropriate. As used in this policy, *school business days* means days on which the District's main office is open.

Filing a Complaint

A person (hereinafter Complainant) who wishes to avail oneself of this grievance procedure may do so by filing a complaint with any District Complaint Manager. The Complainant shall not be required to file a complaint with a particular Complaint Manager and may request a Complaint Manager of the same gender. The Complaint Manager may request the Complainant to provide a written statement regarding the nature of the complaint or require a meeting with a student's parent(s)/guardian(s). The Complaint Manager shall assist the Complainant as needed.

For any complaint alleging bullying and/or cyberbullying of students, the Complaint Manager or designee shall process and review the complaint under Board policy 7:180, *Prevention of and Response to Bullying, Intimidation, and Harassment*, in addition to any response required by this policy.

For any complaint alleging sex discrimination that, if true, would implicate Title IX of the Education Amendments of 1972 ([20 U.S.C. §1681 et seq.](#)), the Title IX Coordinator or designee shall process and review the complaint under Board policy 2:265, *Title IX Grievance Procedure*.

For any complaint alleging harassment on the basis of race, color, or national origin, the Nondiscrimination Coordinator or a Complaint Manager or designee shall process and review the complaint under Board policy 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*, in addition to any response required by this policy.

For any complaint alleging sexual harassment or other violation of Board policy 5:20, *Workplace Harassment Prohibited*, the Nondiscrimination Coordinator or a Complaint Manager or designee shall process and review the complaint according to that policy, in addition to any response required by this policy, and shall consider whether an investigation under Board policy 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*, should be initiated.

Investigation Process

The Complaint Manager will investigate the complaint or appoint a qualified person to undertake the investigation on the individual's behalf. The Complaint Manager shall ensure both parties have an equal opportunity to present evidence during an investigation. The complaint and identity of the Complainant will not be disclosed except: (1) as required by law, this policy, or any collective bargaining agreement, (2) as necessary to fully investigate the complaint, or (3) as authorized by the Complainant.

The identity of any student witnesses will not be disclosed except: (1) as required by law, this policy, or any collective bargaining agreement, (2) as necessary to fully investigate the complaint, or (3) as authorized by the parent/guardian of the student witness, or by the student if the student is 18 years of age or older.

The Complaint Manager will inform, at regular intervals, the person(s) filing a complaint under this policy about the status of the investigation. Within 30 school business days after the date the complaint was filed, the Complaint Manager shall file a written report of his or her findings with the Superintendent. The Complaint Manager may request an extension of time from the Superintendent.

The Superintendent will keep the Board informed of all complaints.

If a complaint contains allegations involving the Superintendent or Board member(s), the written report shall be filed directly with the Board, which will make a decision in accordance

with paragraph four of the following section of this policy.

Decision and Appeal

Within five school business days after receiving the Complaint Manager's report, the Superintendent shall provide his or her written decision to the Complainant and the accused as well as to the Complaint Manager. All decisions shall be based upon the *preponderance of evidence* standard.

Within 10 school business days after receiving the Superintendent's decision, the Complainant or the accused may appeal the decision to the Board by making a written request to the Complaint Manager. The Complaint Manager shall promptly forward all materials relative to the complaint and appeal to the Board.

Within 30 school business days after an appeal of the Superintendent's decision, the Board shall affirm, reverse, or amend the Superintendent's decision or direct the Superintendent to gather additional information. Within five school business days after the Board's decision, the Superintendent shall inform the Complainant and the accused of the Board's action.

For complaints containing allegations involving the Superintendent or Board member(s), within 30 school business days after receiving the Complaint Manager's or outside investigator's report, the Board shall provide its written decision to the Complainant and the accused, as well as to the Complaint Manager. This policy shall not be construed to create an independent right to a hearing before the Superintendent or Board. The failure to strictly follow the timelines in this grievance procedure shall not prejudice any party.

Appointing a Nondiscrimination Coordinator, Title IX Coordinator, and Complaint Managers

The Superintendent shall appoint a Nondiscrimination Coordinator to manage the District's efforts to provide equal opportunity employment and educational opportunities and prohibit the harassment of employees, students, and others.

The Superintendent shall appoint a Title IX Coordinator to coordinate the District's efforts to comply with Title IX.

The Superintendent shall appoint at least one Complaint Manager to administer this policy. If possible, the Superintendent will appoint two Complaint Managers, each of a different gender. The District's Nondiscrimination Coordinator may be appointed as one of the Complaint Managers.

The Superintendent shall insert into this policy and keep current the names, office addresses, email addresses, and telephone numbers of the Nondiscrimination Coordinator, Title IX Coordinator, and the Complaint Managers.

Nondiscrimination Coordinator:

~~Merryl Brownlow~~

Jason Smit

12809 S. McVickers Avenue

Palos Heights, IL 60463

jsmit@palos128.org

~~mbrownlow@palos128.org~~

708-597-9040

Title IX Coordinator:

~~Merryl Brownlow~~

Jason Smit

12809 S. McVickers Avenue

Palos Heights, IL 60463

jsmit@palos128.org

~~mbrownlow@palos128.org~~

708-597-9040

Complaint Managers:

~~Merryl Brownlow~~

Mary Kate Moroney

12809 S. McVickers Avenue

Palos Heights, IL 60463

mmoroney@palos128.org

~~mbrownlow@palos128.org~~

708-597-9040

Jason Smit

12809 S. McVickers Avenue

Palos Heights, IL 60463

jsmit@palos128.org

708-597-9040

LEGAL REF.:

[8 U.S.C. §1324a](#) *et seq.*, Immigration Reform and Control Act.

20 U.S.C. §1232g, Family Education Rights Privacy Act.

20 U.S.C. §1400, The Individuals with Disabilities Education Act.

20 U.S.C. §1681 *et seq.*, Title IX of the Education Amendments; 34 C.F.R. Part 106.

29 U.S.C. §206(d), Equal Pay Act.

29 U.S.C. §621 *et seq.*, Age Discrimination in Employment Act.

29 U.S.C. §791 *et seq.*, Rehabilitation Act of 1973.

29 U.S.C. §2612, Family and Medical Leave Act.

42 U.S.C. §2000d *et seq.*, Title VI of the Civil Rights Act of 1964.

42 U.S.C. §2000e *et seq.*, Title VII of the Civil Rights Act of 1964.

42 U.S.C. §2000ff *et seq.*, Genetic Information Nondiscrimination Act.

42 U.S.C. §11431 *et seq.*, McKinney-Vento Homeless Assistance Act.

42 U.S.C. §12101 *et seq.*, Americans With Disabilities Act; 28 C.F.R. Part 35.

105 ILCS 5/2-3.8, 5/3-10, 5/10-20, 5/10-20.5, 5/10-20.7a, 5/10-20.60, 5/10-20.69, 5/10-20.75, 5/10-22.5, 5/22-19, 5/22-95 (final citation pending), 5/22-110, 5/24-4, and 5/27-1, 5/27-23.7, and 45/1-15.^{C1}

105 ILCS 45/, Education for Homeless Children Act.

5 ILCS 415/10(a)(2), Government Severance Pay Act.

5 ILCS 430/70-5(a), State Officials and Employees Ethics Act.

410 ILCS 513/, Ill. Genetic Information Privacy Act.

740 ILCS 174/, Whistleblower Act.

740 ILCS 175/, Ill. False Claims Act.

775 ILCS 5/, Ill. Human Rights Act.

820 ILCS 70/, Employee Credit Privacy Act.

[820 ILCS 112/](#), Equal Pay Act of 2003.

[820 ILCS 180/](#), Victims' Economic Security and Safety Act; [56 Ill.Admin.Code Part 280](#).

[23 Ill.Admin.Code §§1.240](#), [200.40](#), [226.50](#), and [226.570](#).

CROSS REF.: 2:105 (Ethics and Gift Ban), 2:265 (Title IX Grievance Procedure), 2:270 (Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited), 5:10 (Equal Employment Opportunity and Minority Recruitment), 5:20 (Workplace Harassment Prohibited), 5:30 (Hiring Process and Criteria), 5:90 (Abused and Neglected Child Reporting), 6:120 (Education of Children with Disabilities), 6:140 (Education of Homeless Children), 6:170 (Title I Programs), 6:260 (Complaints About Curriculum, Instructional Materials, and Programs), 7:10 (Equal Educational Opportunities), 7:15 (Student and Family Privacy Rights), 7:20 (Harassment of Students Prohibited), 7:180 (Prevention of and Response to Bullying, Intimidation, and Harassment), 7:185 (Teen Dating Violence Prohibited), 7:310 (Restrictions on Publications; Elementary Schools), 8:70 (Accommodating Individuals with Disabilities), 8:95 (Parental Involvement), 8:110 (Public Suggestions and Concerns)

ADOPTED: August 13, 2025

Palos Heights SD 128

PRESSPlus Comments

- C1. The Legal References are updated in response to 105 ILCS 5/22-110, renumbered by P.A. 104-391, and for continuous improvement. **Issue 121, March 2026**

SECTION 4 - OPERATIONAL SERVICES

4:165 Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors

Title has been updated. Original title: Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors

Child sexual abuse and grooming behaviors harm students, their parents/guardians, the District's environment, its school communities, and the community at large, while diminishing a student's ability to learn. The Board has a responsibility and obligation to increase awareness and knowledge of: (1) issues regarding child sexual abuse, (2) likely warning signs that a child may be a victim of sexual abuse, (3) grooming behaviors related to child sexual abuse and grooming, (4) how to report child sexual abuse, (5) appropriate relationships between District employees and students based upon State law, and (6) how to prevent child sexual abuse.

To address the Board's obligation to increase awareness and knowledge of these issues, prevent sexual abuse of children, and define prohibited grooming behaviors, the Superintendent or designee shall implement an Awareness and Prevention of Sexual Abuse and Grooming Behaviors Program. The Program will:

1. Educate students with:
 - a. An age-appropriate and evidence-informed health and safety education curriculum that includes methods for how to report child sexual abuse and grooming behaviors to authorities, through policy 6:60, *Curriculum Content*;
 - b. Information in policy 7:250, *Student Support Services*, about: (i) District counseling options, assistance, and intervention for students who are victims of or affected by sexual abuse, and (ii) community-based Children's Advocacy Centers and sexual assault crisis centers and how to access those serving the District.
2. Train District employees about child sexual abuse and grooming behaviors by January 31 of each school year with materials that include:
 - a. A definition of prohibited grooming behaviors and employee-student boundary violations pursuant to policy 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*;
 - b. Evidence-informed content on preventing, recognizing, reporting, and responding to child sexual abuse, grooming behaviors, and employee-

student boundary violations pursuant to policies 2:260, *Uniform Grievance Procedure*; 2:265, *Title IX Grievance Procedure*; 5:90, *Abused and Neglected Child Reporting*; 5:100, *Staff Development Program*; and 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*; and

- c. How to report child sexual abuse, grooming behaviors, and/or employee-student boundary violations pursuant to policies 2:260, *Uniform Grievance Procedure*; 2:265, *Title IX Grievance Procedure*; and 5:90, *Abused and Neglected Child Reporting*.
3. Provide information to parents/guardians in student handbooks about the warning signs of child sexual abuse, grooming behaviors, and employee-student boundary violations with evidence-informed educational information that also includes:
 - a. Assistance, referral, or resource information, including how to recognize grooming behaviors, appropriate relationships between District employees and students based upon policy 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*, and how to prevent child sexual abuse from happening;
 - b. Methods for how to report child sexual abuse, grooming behaviors, and/or employee-student boundary violations to authorities; and
 - c. Available counseling and resources for children who are affected by sexual abuse, including both emotional and educational support for students affected by sexual abuse, so that the student can continue to succeed in school pursuant to policy 7:250, *Student Support Services*.
4. Provide parents/guardians of students in any of grades K through 8 with not less than five days' written notice before commencing any class or course providing instruction in recognizing and avoiding sexual abuse, as well as the opportunity to object in writing. ^{C1}

The district will provide parents/guardians of students in Grades K-8 at least 5 days prior written notice of instruction related to recognizing and avoiding sexual abuse.

LEGAL REF.:

105 ILCS 5/10-23.13, 5/22-85.5, and 5/27-10159.1a, and 5/27-13.2. ^{C2}

105 ILCS 110/35/27-215, Critical Health Problems and Comprehensive Health Education Act.

325 ILCS 5/, Abused and Neglected Child Reporting Act.

720 ILCS 5/11-25, Criminal Code of 2012.

CROSS REF.: 2:260 (Uniform Grievance Procedure), 2:265 (Title IX Grievance Procedure), 4:175 (Convicted Child Sex Offender; Screening; Notifications), 5:90 (Abused and Neglected

Child Reporting), 5:100 (Staff Development Program), 5:120 (Employee Ethics; Code of Professional Conduct; and Conflict of Interest), 6:60 (Curriculum Content), 7:20 (Harassment of Students Prohibited), 7:250 (Student Support Services)

ADOPTED: January 25, 2023

Palos Heights SD 128

PRESSPlus Comments

- C1. Updated in response to the repeal of 105 ILCS 5/27-13.2, by P.A. 104-391. **Issue 121, March 2026**
- C2. The Legal References are updated in response to 105 ILCS 27/1015 and 27/215, both renumbered by P.A. 104-391. **Issue 121, March 2026**

Document Status: Draft Update

Professional Personnel

5:250 Leaves of Absence

Each of the provisions in this policy applies to all professional personnel to the extent that it does not conflict with an applicable collective bargaining agreement or individual employment contract or benefit plan; in the event of a conflict, such provision is severable and the applicable bargaining agreement or individual agreement will control.

Sick and Bereavement Leave, Personal Leave, Adoption Leave, Child-Rearing Leave

Please refer to the following current agreement:

"Palos Heights School District 128, PHEA Teacher Contract."

Staff members are entitled to use up to 30 days of paid sick leave because of the birth of a child that is not dependent on the need to recover from childbirth. Such days may be used at any time within the 12-month period following the birth of the child. Intervening periods of nonworking days or school not being in session, such as breaks and holidays, do not count towards the 30 working school days. As a condition of paying sick leave beyond the 30 working school days, the Board or Superintendent may require medical certification.

For purposes of adoption, placement for adoption, or acceptance of a child in need of foster care, paid sick leave may be used for reasons related to the formal adoption or the formal foster care process prior to taking custody of the child or accepting the child in need of foster care, and for taking custody of the child or accepting the child in need of foster care. Such leave is limited to 30 days, unless a longer leave is provided in an applicable collective bargaining agreement, and need not be used consecutively once the formal adoption or foster care process is underway. The Board or Superintendent may require that the employee provide evidence that the formal adoption or foster care process is underway.

Family Bereavement Leave

State law allows a maximum of 10 unpaid work days for eligible employees (Family and Medical Leave Act of 1993, [20 U.S.C. §2601 et seq.](#)) to take family bereavement leave. The purpose, requirements, scheduling, and all other terms of the leave are governed by the Family Bereavement Leave Act. Eligible employees may use family bereavement leave, without any adverse employment action, for: (1) attendance by the bereaved staff member at the funeral or alternative to a funeral of a covered family member, which includes an

employee's child, stepchild, spouse,^{C1} domestic partner, sibling, parent, mother-in-law, father-in-law, grandchild, grandparent, or stepparent (2) making arrangements necessitated by the death of the covered family member, (3) grieving the death of the covered family member, or (4) absence from work due to a Significant Event, which includes: (i) miscarriage, (ii) an unsuccessful round of intrauterine insemination or of an assisted reproductive technology procedure, (iii) a failed adoption match or an adoption that is not finalized because it is contested by another party, (iv) a failed surrogacy agreement, (v) a diagnosis that negatively impacts pregnancy or fertility, or (vi) a still birth. An employee qualifying for leave due to a Significant Event will not be required to identify which specific reason applies to the employee's request.

The leave must be completed within 60 days after the date on which the employee received notice of the death of the covered family member or the date on which an event under item (4) above occurs. However, in the event of the death of more than one covered family member in a 12-month period, an employee is entitled to up to a total of six weeks of bereavement leave during the 12-month period, subject to certain restrictions under State and federal law. Other existing forms of leave may be substituted for the leave provided in the Family Bereavement Leave Act. This policy does not create any right for an employee to take family bereavement leave that is inconsistent with the Family Bereavement Leave Act.

Child Extended Bereavement Leave

Unpaid leave from work is available to employees who experience the loss of a child by suicide or homicide. The Child Extended Bereavement Leave Act governs the duration, scheduling, continuity of benefits, and all other terms of the leave. Accordingly, if the District employs at least 50 but not more than 249 employees on a full-time basis, an employee is entitled to a total of six weeks of unpaid leave within one year after the employee notifies the District of the loss. An employee may elect to substitute other forms of leave to which the employee is entitled for the leave provided under the Child Extended Bereavement Leave Act.

Sabbatical Leave

Sabbatical leave may be granted in accordance with the School Code.

Leaves for Service in the Military

Leaves for service in the U.S. Armed Services or any of its reserve components and the National Guard, as well as re-employment rights, will be granted in accordance with State and federal law. A professional staff member hired to replace one in military service does not acquire tenure.

General Assembly Leave

Leaves for service in the General Assembly, as well as re-employment rights, will be granted in accordance with State and federal law. A professional staff member hired to replace one in the General Assembly does not acquire tenure.

Leave for Employment in Department of Defense

The Board may grant teachers a leave of absence to accept employment in a Dept. of Defense overseas school.

School Visitation Leave

An eligible professional staff member is entitled to eight hours during any school year, no more than four hours of which may be taken on any given day, to attend school conferences, behavioral meetings, or academic meetings related to the teacher's child, if the conference or meeting cannot be scheduled during non-work hours. Professional staff members must first use all accrued vacation leave, personal leave, compensatory leave, and any other leave that may be granted to the professional staff member, except sick, and disability leave.

The Superintendent shall develop administrative procedures implementing this policy consistent with the School Visitation Rights Act.

Leaves for Victims of Domestic Violence, Sexual Violence, Gender Violence, or Other Crime of Violence

An unpaid leave from work is available to any staff member who: (1) is a victim of domestic violence, sexual violence, gender violence, or any other crime of violence or (2) has a family or household member who is a victim of such violence whose interests are not adverse to the employee as it relates to the domestic violence, sexual violence, gender violence, or any other crime of violence. The unpaid leave allows the employee to seek medical help, legal assistance, counseling, safety planning, and other assistance, and to grieve and attend to matters necessitated by the death of a family or household member who is killed in a crime of violence, without suffering adverse employment action.

The Victims' Economic Security and Safety Act (VESSA) governs the purpose, requirements, scheduling, and continuity of benefits, and all other terms of the leave. Accordingly, if the District employs at least 50 employees, and subject to any exceptions in VESSA, an employee is entitled to a total of 12 work weeks of unpaid leave during any 12-month period. Neither the law nor this policy creates a right for an employee to take unpaid leave that exceeds the unpaid leave time allowed under, or is in addition to the unpaid leave time permitted by, the federal Family and Medical Leave Act of 1993 ([29](#)

U.S.C. §2601 *et seq.*).

Leaves to Serve as an Officer, Trustee, or Representative of a Specific Organization

Upon request, the Board will grant: (1) an unpaid leave of absence to a teacher who is elected to serve as an officer of a State or national teacher organization that represents teachers in collective bargaining negotiations, (2) up to twenty days of paid leave of absence per year to a trustee of the Teachers' Retirement System to attend meetings and seminars as described in [105 ILCS 5/24-6.3](#), (3) a paid leave of absence for the local association president of a State teacher association that is an exclusive bargaining agent in the District, or his or her designee, to attend meetings, workshops, or seminars as described in [105 ILCS 5/24-6.2](#), and (4) up to 10 days of paid leave per school term for teachers elected to represent a statewide teacher association in federal advocacy work in accordance with [105 ILCS 5/24-3.5](#).

Leave to Serve as an Election Judge

Any staff member who was appointed to serve as an election judge under State law may, after giving at least 20-days' written notice to the District, be absent without pay for the purpose of serving as an election judge. The staff member is not required to use any form of paid leave to serve as an election judge. No more than 10% of the District's employees may be absent to serve as election judges on the same Election Day.

COVID-19 Paid Administrative Leave

When applicable, paid administrative leave related to COVID-19 will be granted to eligible employees in accordance with State law.

Family Neonatal Intensive Care Leave^{C2}

An unpaid leave from work is available to any staff member whose child^{C3} is a patient in a neonatal intensive care unit (NICU) in accordance with the requirements of the Family Neonatal Intensive Care Leave Act. If the District employs at least 51 employees, an employee is entitled to a total of 20 days of unpaid leave while a child of the employee is a patient in a NICU.^{Q1} The District may require reasonable verification of the employee's child's length of stay in a NICU.^{C4}

LEGAL REF.:

[105 ILCS 5/10-20.83](#), [5/24-6](#), [5/24-6.1](#), [5/24-6.2](#), [5/24-6.3](#), [5/24-13](#), and [5/24-13.1](#).

10 ILCS 5/13-2.5, Election Code.

330 ILCS 61/, Service Member Employment and Reemployment Rights Act.

105 ILCS 5/24-6, 5/24-6.1, 5/24-6.2, 5/24-6.3, 5/24-13, and 5/24-13.1.

820 ILCS 147/, School Visitation Rights Act.

820 ILCS 154/, Family Bereavement Leave Act.

820 ILCS 156/, Child Extended Bereavement Leave Act.

820 ILCS 157/, Family Neonatal Intensive Care Leave Act.

820 ILCS 180/, Victims' Economic Security and Safety Act.

CROSS REF.: 5:180 (Temporary Illness or Temporary Incapacity), 5:185 (Family and Medical Leave), 5:330 (Sick Days, Vacation, Holidays, and Leaves)

ADOPTED: January 24, 2024

Palos Heights SD 128

PRESSPlus Comments

- C1. Updated for continuous improvement. A covered family member includes a spouse under 105 ILCS 154/5. **Issue 121, March 2026**
- C2. Updated in response to 820 ILCS 157/, added by P.A. 104-259, eff. 6-1-26. This leave is separate from FMLA leave, and an employer must allow the employee to take the leave in addition to FMLA leave. The term *employee* includes part-time workers. **Issue 121, March 2026**

- C3. *Child* means an employee's son or daughter who is a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis. **Issue 121, March 2026**
- C4. An employer may not request confidential information protected by the Health Insurance Portability and Accountability Act or other law when asking for reasonable verification. Consult the board attorney for guidance on acceptable forms of verification. **Issue 121, March 2026**
-

Questions

- Q1. A district that employs 50 or fewer employees may substitute the following sentence: "If the District employs at least 16 but not more than 50 employees, an employee is entitled to a total 10 days of unpaid leave while a child of the employee is a patient in a NICU." 820 ILCS 157/10, added by P.A. 104-259, eff. 6-1-26. A district that employs 15 or fewer employees is not subject to the requirements of 820 ILCS 157/. If the district employs 15 or fewer employees, it may choose to delete this subhead.

How many employees are employed by the district, including part-time workers?

Options



51 or more full- or part-time employees. (Default)



50 or fewer full- or part-time employees. (IASB will substitute the following sentence: "If the District employs at least 16 but not more than 50 employees, an employee is entitled to a total 10 days of unpaid leave while a child of the employee is a patient in a NICU.")

Document Status: Draft Update

General Personnel

5:30 Hiring Process and Criteria

The District hires the most qualified personnel consistent with budget and staffing requirements and in compliance with Board of Education policy on equal employment opportunity and minority recruitment. The Superintendent is responsible for recruiting personnel and making hiring recommendations to the Board. If the Superintendent's recommendation is rejected, the Superintendent must submit another. The Superintendent may select personnel on a short-term basis for a specific project or emergency condition before the Board's approval.

No individual will be employed who has been convicted of a criminal offense listed in [105 ILCS 5/21B-80\(c\)](#).

All applicants must complete a District application in order to be considered for employment.

Job Descriptions

The Board maintains the Superintendent's job description and directs, through policy, the Superintendent, in one's charge of the District's administration.

The Superintendent shall develop and maintain a current comprehensive job description for each position or job category; however, a provision in a collective bargaining agreement or individual contract will control in the event of a conflict.

Investigations

The Superintendent or designee shall ensure that a fingerprint-based criminal history records check and a check of the Statewide Sex Offender Database and Violent Offender Against Youth Database is performed on each applicant as required by State law. When the applicant is a successful superintendent candidate who has been offered employment by the Board, the Board President shall ensure that these checks are completed. The Superintendent or designee, or if the applicant is a successful superintendent candidate, then the Board President shall notify an applicant if the applicant is identified in either database. The School Code requires the Board President to keep a conviction record confidential and share it only with the Superintendent, appropriate Intermediate Service Center Executive Director, State Superintendent, State Educator Preparation and Licensure Board, any other person necessary to the hiring decision, the Ill. State Police and/or

Statewide Sex Offender Database for purposes of clarifying the information, and/or the Teachers' Retirement System of the State of Illinois when required by law. The Board reserves its right to authorize additional background inquiries beyond a fingerprint-based criminal history records check when it deems it appropriate to do so, in accordance with applicable laws.

Each newly hired employee must complete a U.S. Citizenship and Immigration Services Form as required by federal law.

The District retains the right to discharge any employee whose criminal background investigation reveals a conviction for committing or attempting to commit any of the offenses outlined in [105 ILCS 5/21B-80](#) or who falsifies, or omits facts from, one's employment application or other employment documents. If an indicated finding of abuse or neglect of a child has been issued by the Ill. Department of Children and Family Services or by a child welfare agency of another jurisdiction for any applicant for student teaching, applicant for employment, or any District employee, then the Board must consider that person's status as a condition of employment.

The Superintendent shall ensure that the District does not engage in any investigation or inquiry prohibited by law and complies with each of the following:

1. The District uses an applicant's credit history or report from a consumer reporting agency only when a satisfactory credit history is an established bona fide occupational requirement of a particular position.
2. The District does not screen applicants based on their current or prior wages or salary histories, including benefits or other compensation, by requiring that the wage or salary history satisfy minimum or maximum criteria.
3. The District does not request or require a wage or salary history as a condition of being considered for employment, being interviewed, continuing to be considered for an offer of employment, an offer of employment, or an offer of compensation.
4. The District does not request or require an applicant to disclose wage or salary history as a condition of employment.
5. The District does not ask an applicant or applicant's current or previous employers about wage or salary history, including benefits or other compensation.
6. The District does not ask an applicant or applicant's previous employers about claim(s) made or benefit(s) received under the Workers' Compensation Act.
7. The District does not request of an applicant or employee access in any manner to his or her personal online account, such as social networking websites, including a request for passwords to such accounts.
8. The District provides equal employment opportunities to all persons. See policy 5:10,

Equal Employment Opportunity and Minority Recruitment.

Sexual Misconduct Related Employment History Review (EHR)

Prior to hiring an applicant for a position involving *direct contact with children or students*, the Superintendent shall ensure that an EHR is performed as required by State law. When the applicant is a superintendent candidate, the Board President shall ensure that the EHR is initiated before a successful superintendent candidate is offered employment by the Board.

Physical Examinations

Each new employee must furnish evidence of physical fitness to perform assigned duties and freedom from communicable disease. The physical fitness examination must be performed by a physician licensed in Illinois, or any other state, to practice medicine and surgery in any of its branches, a licensed advanced practice registered nurse, or a licensed physician assistant who has been delegated the authority by his or her supervising physician to perform health examinations. The employee must have the physical examination performed no more than 90 days before submitting evidence of it to the District.

Any employee may be required to have an additional examination by a physician who is licensed in Illinois to practice medicine and surgery in all its branches, a licensed advanced practice registered nurse, or a licensed physician assistant who has been delegated the authority by his or her supervising physician to perform health examinations, if the examination is job-related and consistent with business necessity. The Board will pay the expenses of any such examination. ^{C1}

Orientation Program

The District's staff will provide an orientation program for new employees to acquaint them with the District's policies and procedures, the school's rules and regulations, and the responsibilities of their position. Before beginning employment, each employee must sign the *Acknowledgement of Mandated Reporter Status* form as provided in policy 5:90, *Abused and Neglected Child Reporting*.

LEGAL REF.:

[8 U.S.C. §1324a](#) *et seq.*, Immigration Reform and Control Act.

[15 U.S.C. §1681](#) *et seq.*, Fair Credit Reporting Act.

[42 U.S.C. §12112](#), Americans with Disabilities Act; [29 C.F.R. Part 1630](#).

[105 ILCS 5/10-16.7](#), [5/10-20.7](#), [5/10-21.4](#), [5/10-21.9](#), [5/10-22.34](#), [5/10-22.34b](#), [5/21B-10](#), [5/21B-80](#), [5/21B-85](#), [5/22-6.5](#), [5/22-94](#), and [5/24-5](#).

[20 ILCS 2630/3.3](#), Criminal Identification Act.

[820 ILCS 55/](#), Right to Privacy in the Workplace Act.

[820 ILCS 70/](#), Employee Credit Privacy Act.

[820 ILCS 112/](#), Equal Pay Act of 2003.

[Duldulao v. St. Mary of Nazareth Hospital](#), 136 Ill. App. 3d 763 (1st Dist. 1985), *aff'd in part and remanded* 115 Ill.2d 482 (Ill. 1987).

[Kaiser v. Dixon](#), 127 Ill. App. 3d 251 (2nd Dist. 1984).

[Molitor v. Chicago Title & Trust Co.](#), 325 Ill. App. 124 (1st Dist. 1945).

CROSS REF.: 2:260 (Uniform Grievance Procedure), 3:50 (Administrative Personnel Other Than the Superintendent), 4:60 (Purchases and Contracts), , 4:175 (Convicted Child Sex Offender; Criminal Background Check and/or Screen; Notifications), 5:10 (Equal Employment Opportunity and Minority Recruitment), 5:40 (Communicable and Chronic Infectious Disease), 5:90 (Abused and Neglected Child Reporting), 5:120 (Employee Ethics; Code of Professional Conduct; and Conflict of Interest), 5:125 (Personal Technology and Social Media; Usage and Conduct), 5:220 (Substitute Teachers), 5:280 (Duties and Qualifications)

ADOPTED: January 24, 2024

Palos Heights SD 128

PRESSPlus Comments

- C1. Consult the board attorney if a staff member requests more than one physical examination to obtain a second opinion. **Issue 121, March 2026**

Educational Support Personnel

5:330 Sick Days, Vacation, Holidays, and Leaves

Each of the provisions in this policy applies to all educational support personnel to the extent that it does not conflict with an applicable collective bargaining agreement or individual employment contract or benefit plan; in the event of a conflict, such provision is severable and the applicable bargaining agreement or individual agreement will control.

Sick and Bereavement Leave

Full or part-time educational support personnel who work at least 600 hours per year receive 10 paid sick leave days per year. Part-time employees will receive sick leave pay equivalent to their regular workday. Unused sick leave shall accumulate to a maximum of 180 days, including the leave of the current year.

Sick leave is defined in State law as personal illness, mental or behavioral complications, quarantine at home, serious illness or death in the immediate family or household, or birth, adoption, placement for adoption, or the acceptance of a child in need of foster care. The Superintendent or designee shall monitor the use of sick leave.

As a condition for paying sick leave after three days absence for personal illness or as the Board or Superintendent deem necessary in other cases, the Board or Superintendent may require that the staff member provide a certificate from: (1) a physician licensed in Illinois to practice medicine and surgery in all its branches, (2) a mental health professional licensed in Illinois providing ongoing care or treatment to the staff member, (3) a chiropractic physician licensed under the Medical Practice Act, (4) a licensed advanced practice registered nurse, (5) a licensed physician assistant who has been delegated the authority to perform health examinations by his or her supervising physician, or (6) if the treatment is by prayer or spiritual means, a spiritual adviser or practitioner of the employee's faith. If the Board or Superintendent requires a certificate during a leave of less than three days for personal illness, the District shall pay the expenses incurred by the employee.

Employees are entitled to use up to 30 days of paid sick leave because of the birth of a child that is not dependent on the need to recover from childbirth. Such days may be used at any time within the 12-month period following the birth of the child. Intervening periods of nonworking days or school not being in session, such as breaks and holidays, do not count towards the 30 working school days. As a condition of paying sick leave beyond the 30 working school days, the Board or the Superintendent may require medical certification.

For purposes of adoption, placement for adoption, or acceptance of a child in need of foster care, paid sick leave may be used for reasons related to the formal adoption or the formal foster care process prior to taking custody of the child or accepting the child in need of foster care, and for taking custody of the child or accepting the child in need to foster care. Such leave is limited to 30 days, unless a longer leave is provided in an applicable collective bargaining agreement, and need not be used consecutively once the formal adoption or foster care process is underway. The Board or Superintendent may require that the employee provide evidence that the formal adoption or foster care process is underway.

Vacation

Twelve-month employees shall be eligible for paid vacation days according to the following schedule:

Length of Employment		<u>Earned Per</u> <u>Monthly Accumulation</u>	Maximum Vacation Leave Earned Per Year
<u>From:</u>	<u>To:</u>		
Beginning of year 2	End of year 5	0.83 Days	10 Days per year
Beginning of year 6	End of year 15	1.25 Days	15 Days per year
Beginning of year 16	End of year	1.67 Days	20 Days per year

Part-time employees who work at least half-time are entitled to vacation days on the same basis as full-time employees, but the pay will be based on the employee's average number of part-time hours per week during the last vacation accrual year. The Superintendent will determine the procedure for requesting vacation.

Vacation days earned in one fiscal year must be used by the end of the following fiscal year; they do not accumulate. Employees resigning or whose employment is terminated are entitled to the monetary equivalent of all earned vacation.

Holidays

Unless the District has a waiver or modification of the School Code pursuant to [Section 2-3.25g](#) or [24-2\(b\)](#) allowing it to schedule school on a legal school holiday listed below, District employees will not be required to work on:

New Year's Day

Labor Day

Martin Luther King Jr.'s Birthday

Columbus Day

Abraham Lincoln's Birthday

Veterans Day

Casimir Pulaski's Birthday

2024 General Election
Day, when required by
law^{C1}

Memorial Day

Thanksgiving Day

Juneteenth National Freedom Day

Christmas Day

Independence Day

A holiday will not cause a deduction from an employee's time or compensation. The District may require educational support personnel to work on a school holiday during an emergency or for the continued operation and maintenance of facilities or property.

Personal Leave

Full-time educational support personnel have one paid personal leave day per year. The use of a personal day is subject to the following conditions:

1. Except in cases of emergency or unavoidable situations, a personal leave request should be submitted to the Building Principal three days before the requested date.
2. No personal leave day may be used immediately before or immediately after a holiday, or during the first and/or last five days of the school year, unless the Superintendent grants prior approval.
3. Personal leave may not be used in increments of less than one-half day.
4. Personal leave is subject to any necessary replacement's availability.
5. Personal leave may not be used on an in-service training day and/or institute training days.
6. Personal leave may not be used when the employee's absence would create an undue hardship.

Leave to Serve as a Trustee of the III. Municipal Retirement Fund

Upon request, the Board will grant 20 days of paid leave of absence per year to a trustee of the III. Municipal Retirement Fund in accordance with State law.

Other Leaves

Educational support personnel receive the following leaves on the same terms and conditions granted professional personnel in Board policy 5:250, *Leaves of Absence*:

1. Leave for Service in the Military.
2. Leave for Service in the General Assembly.
3. School Visitation Leave.
4. Leaves for Victims of Domestic Violence, Sexual Violence, Gender Violence, or Other Crime of Violence.
5. Family Bereavement Leave.
6. Child Extended Bereavement Leave.
7. Leave to serve as an election judge.
8. COVID-19 Paid Administrative Leave.
9. Family Neonatal Intensive Care Leave.^{C2}

LEGAL REF.:

105 ILCS 5/10-20.7b, 5/10-20.83, 5/24-2, 5/24-6, and 5/24-6.3.

10 ILCS 5/13-2.5, Election Code.

330 ILCS 61/, Service Member Employment and Reemployment Rights Act.

820 ILCS 147, School Visitation Rights Act.

820 ILCS 154/, Family Bereavement Leave Act.

820 ILCS 156/, Child Extended Bereavement Leave Act.

820 ILCS 157/, Family Neonatal Intensive Care Leave Act.

820 ILCS 180/, Victims' Economic Security and Safety Act.

School Dist. 151 v. ISBE, 154 Ill.App.3d 375 (1st Dist. 1987); *Elder v. Sch. Dist. No.127 1/2*, 60 Ill.App.2d 56 (1st Dist. 1965).

CROSS REF.: 5:180 (Temporary Illness or Temporary Incapacity), 5:185 (Family and Medical Leave), 5:250 (Leaves of Absence)

ADOPTED: January 24, 2024

Palos Heights SD 128

PRESSPlus Comments

- C1. The General Assembly passed legislation adding General Election Day as a school holiday for 2020, 2022, and 2024. Language referring to a General Election holiday when required by law is maintained in this policy should this practice continue. **Issue 121, March 2026**

- C2. Updated in response to 820 ILCS 157/, added by P.A. 104-259, eff. 6-1-26. See policy 5:250, *Leaves of Absence*, for important information about this leave. **Issue 121, March 2026**

Document Status: Draft Update

SECTION 6 - INSTRUCTION

6:65 Student Social and Emotional Development

Social and Emotional Learning^{C1} (SEL) is defined as the process through which students enhance their ability to integrate thinking, feeling, and behaving to achieve important life tasks. Students competent in SEL are able to recognize and manage their emotions, establish healthy relationships, set positive goals, meet personal and social needs, and make responsible and ethical decisions.

The Superintendent shall incorporate SEL into the District's curriculum and other educational programs consistent with the District's mission and the goals and benchmarks of the Ill. Learning Standards. The Ill. Learning Standards include three goals for students:

1. Develop self-awareness and self-management skills to achieve school and life success.
2. Use social awareness and interpersonal skills to establish and maintain positive relationships.
3. Demonstrate decision-making skills and responsible behaviors in personal, school, and community contexts.

The incorporation of SEL objectives into the District's curriculum and other educational programs may include but is not limited to:

1. Classroom and school-wide programming to foster a safe, supportive learning environment where students feel respected and valued. This may include incorporating scientifically based, age- and culturally appropriate classroom instruction, and District-wide, and school-wide strategies that teach SEL skills, promote optimal mental health, and prevent risk behaviors for all students.
2. Ongoing staff professional development and training support to promote students' SEL development. This may include providing all personnel with age-appropriate academic and SEL and how to promote it.
3. Parent/Guardian and family involvement to promote students' SEL development. This may include providing parents/guardians and families with learning opportunities related to the importance of their children's optimal SEL development and ways to enhance it.
4. Community partnerships to promote students' SEL development. This may include

establishing partnerships with diverse community agencies and organizations to assure a coordinated approach to addressing children's mental health and SEL development.

5. Early identification and intervention to enhance students' school readiness, academic success, and use of good citizenship skills. This may include development of a system and procedures for periodic and universal screening, assessment, and early intervention for students who have significant risk factors for social, emotional, or mental health conditions that impact learning.
6. Treatment to prevent or minimize mental health conditions in students. This may include building and strengthening referral and follow-up procedures for providing effective clinical services for students with social, emotional, and mental health conditions that impact learning. This may include student and family support services, school-based behavioral health services, and school-community linked services and supports.
7. Assessment and accountability for teaching SEL skills to all students. This may include implementation of a process to assess and report baseline information and ongoing progress about school climate, students' social and emotional development, and academic performance.

LEGAL REF.:

Children's Mental Health Act, 405 ILCS 49/, Children's Mental Health Act.

CROSS REF.: 1:30, (School District Philosophy), 6:10 (Educational Philosophy and Objectives), 6:40 (Curriculum Development), 6:60 (Curriculum Content), 6:270 (Guidance and Counseling Program), 7:100 (Health, Eye, and Dental Examinations; Immunizations; and Exclusion of Students), 7:180 (Prevention of and Response to Bullying, Intimidation, and Harassment), 7:250 (Student Support Services)

ADOPTED: January 25, 2023

Palos Heights SD 128

PRESSPlus Comments

C1. Updated throughout for continuous improvement. **Issue 121, March 2026**

Document Status: Draft Update

SECTION 6 - INSTRUCTION

6:100 Using Animals in the Educational Program

Animals may be brought into school facilities for educational purposes according to procedures developed by the Superintendent assuring: (a) the animal is appropriately housed, humanely cared for, and properly handled, and (b) students will not be exposed to a dangerous animal or an unhealthy environment.

Animal Experiments

Experiments on living animals are prohibited; however, behavior studies that do not impair an animal's health or safety are permissible.

Animal Dissection

The dissection of dead animals or parts of dead animals shall be allowed in the classroom only when the dissection exercise contributes to or is a part of an illustration of pertinent study materials. All dissection of animals shall be confined to the classroom and must comply with the School Code.

Students who object to performing, participating in, or observing the dissection of animals are excused from classroom attendance without penalty during times when such activities are taking place. No student will be penalized or disciplined for refusing to perform, participate in, or observe a dissection. The Superintendent or designee shall inform students of: (1) their right to refrain from performing, participating in, or observing dissection, and (2) which courses contain a dissection unit and which of those courses offers an alternative project.

LEGAL REF.:

105 ILCS 5/2-3.122 and, 5/27-~~265~~^{C1}14, and 112/.

105 ILCS 5/112, Dissection Alternatives Act.

CROSS REF.: 6:40 (Curriculum Development)

ADOPTED: September 15, 2021

PRESSPlus Comments

- C1. The Legal References are updated in response to 105 ILCS 5/27-265, renumbered by P.A. 104-391, and for continuous improvement. **Issue 121, March 2026**

Document Status: Draft Update

SECTION 6 - INSTRUCTION

6:145 Migrant Students

The Superintendent will develop and implement a program to address the needs of migrant children in the District in accordance with federal law.

This program will:

1. Identify migrant students and assess their educational and related health and social needs.
2. Provide a full range of services to migrant students through appropriate local, State and federal educational programs, including applicable Title I programs, special education, gifted education, vocational education, language programs, counseling programs, and elective classes.
3. Provide migrant children students^{C1} with full and appropriate opportunities to meet the same challenging State academic standards that all children are expected to meet.
4. Provide, to the extent feasible:
 - a. Advocacy and outreach programs to migrant children and their families, including helping such children and families gain access to other education, health, nutrition, and social services,
 - b. Professional development programs, including mentoring, for District staff,
 - c. Family literacy programs, and
 - d. The integration of information technology into educational and related programs.
 - e. Provide programs, activities, and procedures for the engagement of parents/guardians and family members of migrant students in an understandable format and language.

Migrant Education Program for Parent/Guardian and Family Member Engagement

Parents/guardians and family members of migrant students will be involved in and regularly consulted about the development, implementation, operation, and evaluation of the migrant program.

Parents/guardians and family members of migrant students will receive instruction regarding their role in improving the academic achievement of their children.

LEGAL REF.:

[20 U.S.C. §6318](#).

[20 U.S.C. §6391](#) *et seq.*, Education of Migratory Children.

[34 C.F.R. §200.81](#) *et seq.*

CROSS REF.: 6:170 (Title I Programs)

ADOPTED: September 15, 2021

Palos Heights SD 128

PRESSPlus Comments

- C1. Updated throughout in response to a PRESS five-year review. PRESS Editors have a quality assurance goal to ensure that a review of each piece of the 1500+ page IASB PRESS Policy Reference Manual occurs once every five years. **Issue 121, March 2026**

Document Status: Draft Update

SECTION 6 - INSTRUCTION

6:170 Title I Programs

The Superintendent or designee shall pursue funding under Title I, Improving the Academic Achievement of the Disadvantaged, of the Elementary and Secondary Education Act, to supplement instructional services and activities in order to improve the educational opportunities of educationally disadvantaged or deprived children.

All District schools, regardless of whether they receive Title I funds, shall provide services that, taken as a whole, are substantially comparable. Teachers, administrators, and other staff shall be assigned to schools in a manner that ensures equivalency among the District's schools. Curriculum materials and instructional supplies shall be provided in a manner that ensures equivalency among the District's schools.

Title I Parent and Family Engagement

The District maintains programs, activities, and procedures for the engagement of parents/guardians and families of students receiving services, or enrolled in programs, under Title I. These programs, activities, and procedures are described in District-level and School-level ~~compacts~~^{C1} plans.

District-Level Parent and Family Engagement Plan~~Compact~~

The Superintendent or designee shall develop a District-Level Parent and Family Engagement ~~Plan~~^{C1} ~~Compact~~ (District Plan) according to Title I requirements. ~~This~~^{C1} District ~~Plan~~^{C1} ~~Level Parent and Family Engagement Compact~~ shall contain: (1) the District's expectations for parent and family engagement, (2) specific strategies for effective parent and family engagement activities to improve student academic achievement and school performance, and (3) other provisions as required by federal law. The Superintendent or designee shall ensure that the ~~District Plan~~^{C1} ~~Compact~~ is distributed to parents/guardians of students receiving services, or enrolled in programs, under Title I.

School-Level Parent and Family Engagement Plan~~Compact~~

Each Building Principal or designee shall develop a School-Level Parent and Family Engagement ~~Plan~~^{C1} ~~Compact~~ (School Plan) according to Title I requirements. This School ~~Plan~~^{C1} ~~Level Parent and Family Engagement Compact~~ shall contain: (1) a

process for continually involving parents/guardians in its development and implementation, (2) how parents/guardians, the entire school staff, and students share the responsibility for improved student academic achievement, (3) the means by which the school and parents/guardians build and develop a partnership to help children achieve the State's high standards, and (4) other provisions as required by federal law. Each Building Principal or designee shall ensure that the School Plan Compact is distributed to parents/guardians of students receiving services, or enrolled in programs, under Title I.

Incorporated

by Reference: 6:170-AP1, E1 (District-Level Parent and Family Engagement Plan Compact) and 6:170-AP1, E2 (School-Level Parent and Family Engagement Plan Compact)

LEGAL REF.:

Title I of the Elementary and Secondary Education Act, 20 U.S.C. §§6301-6514, Title I of the Elementary and Secondary Education Act.

CROSS REF.: 2:260 (Uniform Grievance Procedure), 4:110 (Transportation), 5:190 (Teacher Qualifications), 5:280 (Duties and Qualifications), 6:15 (School Accountability), 6:140 (Education of Homeless Children), 6:145 (Migrant Students), 6:160 (English Learners), 7:10 (Equal Educational Opportunities), 7:30 (Student Assignment), 7:60 (Residence), 7:100 (Health, Eye, and Dental Examinations; Immunizations; and Exclusion of Students), 8:95 (Parental Involvement)

ADOPTED: September 15, 2021

Palos Heights SD 128

PRESSPlus Comments

- C1. To comply with the Elementary and Secondary Education Act (ESEA), a board must incorporate by reference the district's exhibits 6:170-AP1, E1, *District-Level Parent and Family Engagement Plan*, and 6:170-AP1, E2, *School-Level Parent and Family Engagement Plan*. These exhibits, which have both been renamed to more closely align with federal statutes and guidance and terminology used by ISBE, contain all legally required components and are compatible with sample templates contained in the U.S. Dept. of Education's non-regulatory guidance titled Parent and Family Engagement (2025), at: www.ed.gov/media/document/parent-and-family-engagement-guidance-2025-109202.pdf.

Districts receiving a Title I, Part A allocation that are required to submit proof of parent and family engagement (PFE) compliance to the Ill. State Board of Education (ISBE) as part of their FY 2027 Consolidated District Plan (CDP) will need to submit this adopted policy and both exhibits 6:170-AP1, E1 and 6:170-AP1, E2. **Please note that the plans must be customized to reflect the district's actual Title I parent and family engagement activities.** At the end of March, ISBE will offer a recorded webinar on CDPs that will include additional information on Title I requirements. **Issue 121, March 2026**

Document Status: Draft Update

SECTION 6 - INSTRUCTION

6:180 Extended Instructional Programs

The District may offer the following programs in accordance with State law and the District's educational philosophy:

1. Enrichment Program for Kindergarten
2. Before-and after-school programs for students in grades K-6.
3. Tutorial program.
4. Summer school, whether for credit or not.
5. Volunteer service credit program.

LEGAL REF.:

105 ILCS 5/10-22.18a, 5/10-22.18b, 5/10-22.18c, 5/10-22.20, 5/10-22.20a, 5/10-22.20b, 5/10-22.20c, 5/10-22.29, 5/10-22.33A, 5/10-22.33B, 5/10-23.2, 5/27-255, 5/27-90522.1, 5/27-103522.3, and 5/27-105023.6.^{C1}

105 ILCS 110/3, Comprehensive Health Education Program.

105 ILCS 433/, Vocational Academies Act.

CROSS REF.: 6:310 (Credit for Alternative Courses and Programs, and Course Substitutions), 6:320 (High School Credit for Proficiency)

ADOPTED: May 11, 2022

Palos Heights SD 128

PRESSPlus Comments

- C1. The Legal References are updated in response to 105 ILCS 5/27-255, added by P.A. 104-391, replacing, in part, 105 ILCS 110/3, and in response to P.A. 104-391, renumbering and reorganizing various provisions throughout 105 ILCS 5/27. **Issue 121, March 2026**

Document Status: Draft Update

SECTION 7 - STUDENTS

7:20 Harassment of Students Prohibited

No person, including a ~~School~~ District employee, agent, or student, shall harass, intimidate, or bully a student on the basis of actual or perceived: race; color; national origin; military status; unfavorable discharge status from military service; sex; sexual orientation; gender identity; gender-related identity or expression; ancestry; age; religion; physical or mental disability; order of protection status; status of being homeless; actual or potential marital or parental status, including pregnancy; physical appearance; socioeconomic status; academic status; association with a person or group with one or more of the aforementioned actual or perceived characteristics; or any other distinguishing characteristic. The District will not tolerate harassing, intimidating conduct, or bullying whether verbal, physical, sexual, or visual, that affects the tangible benefits of education, that unreasonably interferes with a student's educational performance, or that creates an intimidating, hostile, or offensive educational environment. Examples of prohibited conduct include name-calling, using derogatory slurs, stalking, sexual violence, causing psychological harm, threatening or causing physical harm, threatened or actual destruction of property, or wearing or possessing items depicting or implying hatred or prejudice of one of the characteristics stated above.

Sexual Harassment Prohibited

The District shall provide an educational environment free of verbal, physical, or other conduct or communications constituting harassment on the basis of sex as defined and otherwise prohibited by State and federal law. See Board policies 2:265, *Title IX Grievance Procedure*, and 2:260, *Uniform Grievance Procedure*.

Making a Report or Complaint

Students are encouraged to promptly report claims or incidents of bullying, intimidation, harassment, sexual harassment, or any other prohibited conduct to the Nondiscrimination Coordinator, Building Principal, Assistant Building Principal, Dean of Students, a Complaint Manager, or any employee with whom the student is comfortable speaking.

Reports under this policy will be considered a report under Board policy 2:260, *Uniform Grievance Procedure*, and/or Board policy 2:265, *Title IX Grievance Procedure*. The Nondiscrimination Coordinator, Title IX Coordinator, and/or Complaint Manager or designee shall process and review the report according to the appropriate grievance procedure.

The Superintendent shall insert into this policy the names, office addresses, email addresses, and telephone numbers of the District's current Nondiscrimination Coordinator, Title IX Coordinator, and Complaint Managers.

Nondiscrimination Coordinator:

Title IX Coordinator:

~~Merryl Brownlow~~

Jason Smit

12809 S. McVickers Avenue

Palos Heights, IL 60463

~~mbrownlow@palos128.org~~

jsmit@palos128.org

708-597-9040

~~Merryl Brownlow~~

Jason Smit

12809 S. McVickers Avenue

Palos Heights, IL 60463

~~mbrownlow@palos128.org~~

jsmit@palos128.org

708-597-9040

Complaint Managers:

Mary Kate Moroney

~~Merryl Brownlow~~

Jason Smit

12809 S. McVickers Avenue

Palos Heights, IL 60463

mmoroney@palos128.org

~~mbrownlow@palos128.org~~

708-597-9040

12809 S. McVickers Avenue

Palos Heights, IL 60463

jsmit@palos128.org

708-597-9040

The Superintendent shall use reasonable measures to inform staff members and students of this policy by including:

1. For students, age-appropriate information about the contents of this policy in the District's student handbook(s), on the District's website, and, if applicable, in any other areas where policies, rules, and standards of conduct are otherwise posted in each school.
2. For staff members, this policy in the appropriate employee handbook(s), if applicable, and/or in any other areas where policies, rules, and standards of conduct are otherwise made available to staff.

Investigation Process

Any District employee who receives a report or complaint of harassment must promptly forward the report or complaint to the Nondiscrimination Coordinator, Title IX Coordinator, or a Complaint Manager. Any employee who fails to promptly comply may be disciplined, up to and including discharge.

Reports and complaints of harassment will be confidential to the greatest extent practicable, subject to the District's duty to investigate and maintain an educational environment that is productive, respectful, and free of unlawful discrimination, including harassment.

For any report or complaint alleging sexual harassment that, if true, would implicate Title IX of the Education Amendments of 1972 ([20 U.S.C. §1681 et seq.](#)), the Title IX Coordinator or designee shall consider whether action under Board policy 2:265, *Title IX Grievance Procedure*, should be initiated.

For any report or complaint alleging harassment on the basis of race, color, or national origin, the Nondiscrimination Coordinator or a Complaint Manager or designee shall investigate under Board policy 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*.

For any other alleged student harassment that does not require action under Board policies 2:265, *Title IX Grievance Procedure*, or 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*, the Nondiscrimination Coordinator or a Complaint Manager or designee shall consider whether an investigation under Board policies 2:260, *Uniform Grievance Procedure*, and/or 7:190, *Student Behavior*, should be initiated, regardless of whether a written report or complaint is filed.

Reports That Involve Alleged Incidents of Sexual Abuse of a Child by School Personnel

An *alleged incident of sexual abuse* is an incident of sexual abuse of a child, as defined in [720 ILCS 5/11-9.1A\(b\)](#), that is alleged to have been perpetrated by school personnel, including a school vendor or volunteer, that occurred: on school grounds during a school activity; or outside of school grounds or not during a school activity.

Any complaint alleging an incident of sexual abuse shall be processed and reviewed according to Board policy 5:90, *Abused and Neglected Child Reporting*. In addition to reporting the suspected abuse, the complaint shall also be processed under Board policy 2:265, *Title IX Grievance Procedure*, or Board policy 2:260, *Uniform Grievance Procedure*.

Enforcement

Any District employee who is determined, after an investigation, to have engaged in conduct prohibited by this policy will be subject to disciplinary action up to and including discharge. Any third party who is determined, after an investigation, to have engaged in conduct prohibited by this policy will be addressed in accordance with the authority of the Board in the context of the relationship of the third party to the District, e.g., vendor, parent/guardian, invitee, etc. Any District student who is determined, after an investigation, to have engaged in conduct prohibited by this policy will be subject to disciplinary action, including but not limited to, suspension and expulsion consistent with the behavior policy. Any person making a knowingly false accusation regarding prohibited conduct will likewise be subject to disciplinary action.

Retaliation Prohibited

Retaliation against any person for bringing complaints or providing information about harassment is prohibited (see Board policies 2:260, *Uniform Grievance Procedure*, 2:265, *Title IX Grievance Procedure*, and 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*).

Students should report allegations of retaliation to the Building Principal, an administrator, the Nondiscrimination Coordinator, and/or a Complaint Manager.

LEGAL REF.:

[20 U.S.C. §1681](#) *et seq.*, Title IX of the Educational Amendments of 1972; [34 C.F.R. Part 106](#).

[29 U.S.C. §791](#) *et seq.*, Rehabilitation Act of 1973; [34 C.F.R. Part 104](#).

[42 U.S.C. §2000d](#), Title VI of the Civil Rights Act of 1964; [34 C.F.R. Part 100](#).

105 ILCS 5/10-20.12, 5/10-22.5, 5/10-23.13, 5/22-110, 5/26A, and 5/27-1, and 5/27-23.7.^{C1}

775 ILCS 5/1-101 et seq., Illinois Human Rights Act.

23 Ill.Admin.Code §1.240 and Part 200.

Davis v. Monroe County Bd. of Educ., 526 U.S. 629 (1999).

Franklin v. Gwinnett Co. Public Schs., 503 U.S. 60 (1992).

Gebser v. Lago Vista Independent Sch. Dist., 524 U.S. 274 (1998).

West v. Derby Unified Sch. Dist. No. 260, 206 F.3d 1358 (10th Cir. 2000).

CROSS REF.: 2:260 (Uniform Grievance Procedure), 2:265 (Title IX Grievance Procedure), 2:270 (Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited), 4:165 (Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors), 5:20 (Workplace Harassment Prohibited), 5:90 (Abused and Neglected Child Reporting), 5:120 (Employee Ethics; Code of Professional Conduct; and Conflict of Interest), 7:10 (Equal Educational Opportunities), 7:180 (Prevention of and Response to Bullying, Intimidation, and Harassment), 7:185 (Teen Dating Violence Prohibited), 7:190 (Student Behavior), 7:240 (Conduct Code for Participants in Extracurricular Activities), 7:255 (Students Who are Parents, Expectant Parents, or Victims of Domestic or Sexual Violence)

ADOPTED: August 13, 2025

Palos Heights SD 128

PRESSPlus Comments

C1. The Legal References are updated in response to 105 ILCS 5/22-110, renumbered by P.A. 104-391. **Issue 121, March 2026**

SECTION 7 - STUDENTS**7:50 School Admissions and Student Transfers To and From Non-District Schools**Age

To be eligible for admission, a child must be 5 years old on or before September 1 of that school term. A child entering first grade must be 6 years of age on or before September 1 of that school term. Based upon an assessment of a child's readiness to attend school, the District may permit him or her to attend school prior to these dates. A child will also be allowed to attend first grade based upon an assessment of his or her readiness if he or she attended a non-public preschool, continued his or her education at that school through kindergarten, was taught in kindergarten by an appropriately licensed teacher, and will be 6 years old on or before December 31. A child with exceptional needs who qualifies for special education services is eligible for admission at 3 years of age. Early entrance to kindergarten or first grade may also be available through Board policy 6:135, *Accelerated Placement Program*.

Admission Procedure

All students must register for school each year on the dates and at the place designated by the Superintendent. Parents/guardians of students enrolling in the District for the first time must present:

1. A certified copy of the student's birth certificate. If a birth certificate is not presented, the Superintendent or designee shall notify in writing the person enrolling the student that within 30 days he or she must provide a certified copy of the student's birth certificate. A student will be enrolled without a birth certificate. When a certified copy of the birth certificate is presented, the school shall promptly make a copy for its records, place the copy in the student's permanent record, and return the certified copy to the person enrolling the child. If a person enrolling a student fails to provide a certified copy of the student's birth certificate, the Superintendent or designee shall immediately notify the local law enforcement agency, and shall also notify the person enrolling the student in writing that, unless he or she complies within 10 days, the case will be referred to the local law enforcement authority for investigation. If compliance is not obtained within that 10-day period, the Superintendent or designee shall so refer the case. The Superintendent or designee shall immediately report to

the local law enforcement authority any material received pursuant to this paragraph that appears inaccurate or suspicious in form or content.

2. Proof of residence, as required by Board policy 7:60, *Residence*.
3. Proof of disease immunization or detection and the required physical examination, as required by State law and Board policy 7:100, *Health, Eye, and Dental Examinations; Immunizations; and Exclusion of Students*.

The individual enrolling a student shall be given the opportunity to voluntarily state whether the student has a parent or guardian who is a member of a branch of the U. S. Armed Forces and who is either deployed to active duty or expects to be deployed to active duty during the school year. Students who are children of active duty military personnel transferring will be allowed to enter: (a) the same grade level in which they studied at the school from which they transferred, if the transfer occurs during the District's school year, or (b) the grade level following the last grade completed.

Homeless Children

Any homeless child shall be immediately admitted, even if the child or child's parent/guardian is unable to produce records normally required for enrollment. Board policy 6:140, *Education of Homeless Children*, and its implementing administrative procedure, govern the enrollment of homeless children.

Foster Care Students

The Superintendent will appoint at least one employee to act as a liaison to facilitate the enrollment and transfer of records of students in the legal custody of the Illinois Department of Children and Family Services (DCFS) when enrolling in or changing schools. The District's liaison ensures that DCFS' Office of Education and Transition Services receives all written notices and records pertaining to students in the legal custody of DCFS as required by State law.

Student Transfers To and From Non-District Schools

A student may transfer into or out of the District according to State law and procedures developed by the Superintendent or designee. A student seeking to transfer into the District must serve the entire term of any suspension or expulsion, imposed for any reason by any public or private school, in this or any other state, before being admitted into the School District.

LEGAL REF.:

[8 U.S.C. §1101](#) *et seq.*, Illegal Immigrant and Immigrant Responsibility Act of 1996.

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

20 U.S.C. §1400 *et seq.*, Individuals With Disabilities Education Improvement Act.

29 U.S.C. §794, Rehabilitation Act of 1973, Section 504.

42 U.S.C. §11431 *et seq.*, McKinney-Vento Homeless Assistance Act.

105 ILCS 5/2-3.13a, 5/10-20.12, 5/10-20.59, 5/10-22.5a, 5/14-1.02, 5/14-1.03a, 5/22-105, 5/26-1, and 5/26-2, and 5/27-8.1.^{C1}

105 ILCS 10/8.1, Ill. School Student Records Act.

105 ILCS 45/, Education for Homeless Children Act.

105 ILCS 70/, Educational Opportunity for Military Children Act.

325 ILCS 50/, Missing Children Records Act.

325 ILCS 55/, Missing Children Registration Law.

410 ILCS 315/2, Communicable Disease Prevention Act.

20 Ill.Admin.Code Part 1290, Missing Person Birth Records and School Registration.

23 Ill.Admin.Code Part 226, Special Education.

23 Ill.Admin.Code Part 375, Student Records.

CROSS REF.: 4:110 (Transportation); 6:30 (Organization of Instruction), 6:110 (Programs for Students At Risk of Academic Failure and/or Dropping Out of School and Graduation Incentives Program), 6:135 (Accelerated Placement Program), 6:140 (Education of Homeless Children), 7:60 (Residence), 7:70 (Attendance and Truancy), 7:100 (Health, Eye, and Dental Examinations; Immunizations; and Exclusion of Students), 7:340 (Student Records)

ADOPTED: January 25, 2023

Palos Heights SD 128

PRESSPlus Comments

- C1. The Legal References are updated in response to 105 ILCS 5/22-105, titled *Health examinations and immunizations* (formerly 105 ILCS 5/27-8.1), renumbered by P.A. 104-391. **Issue 121, March 2026**

SECTION 7 - STUDENTS

7:100 Health, Eye, and Dental Examinations; Immunizations; and Exclusion of Students

Required Health Examinations and Immunizations

A student's parents/guardians shall present proof that the student received a health examination, with proof of the immunizations against, and screenings for, preventable communicable diseases, as required by the Illinois Department of Public Health (IDPH), within one year prior to:

1. Entering kindergarten or the first grade;
2. Entering the sixth grade; and
3. Enrolling in an Illinois school, regardless of the student's grade (including nursery school, special education, Head Start programs operated by elementary or secondary schools, and students transferring into Illinois from out-of-state or out-of-country).

Proof of immunization against meningococcal disease is required for students in grade 6.

As required by State law:

1. Health examinations must be performed by a physician licensed to practice medicine in all of its branches, an advanced practice registered nurse, or a physician assistant who has been delegated the performance of health examinations by a supervising physician.
2. A diabetes screening is a required part of each health examination; diabetes testing is not required.
3. An age-appropriate developmental screening and an age-appropriate social and emotional screening are required parts of each health examination. A student will not be excluded from school due to his or her parent/guardian's failure to obtain a developmental screening or a social and emotional screening.
4. Before admission and in conjunction with required physical examinations, parents/guardians of children between the ages of one and seven years must provide a statement from a physician that their child was risk-assessed or screened for lead poisoning.

5. The IDPH will provide all students entering sixth grade and their parents/guardians information about the link between human papillomavirus (HPV) and HPV-related cancers and the availability of the HPV vaccine.
6. The District will provide informational materials regarding influenza and influenza vaccinations developed, provided, or approved by the IDPH when it provides information on immunizations, infectious diseases, medications, or other school health issues to students' parents/guardians.

Unless an exemption or extension applies, the failure to comply with the above requirements by October 15 of the current school year will result in the student's exclusion from school until the required health forms are presented to the District. New students who register after October 15 of the current school year shall have 30 days following registration to comply with the health examination and immunization regulations. If a medical reason prevents a student from receiving a required immunization by October 15, the student must present, by October 15, an immunization schedule and a statement of the medical reasons causing the delay. The schedule and statement of medical reasons must be signed by the physician, advanced practice registered nurse, physician assistant, or local health department responsible for administering the immunizations.

A student transferring from out-of-state who does not have the required proof of immunizations by October 15 may attend classes only if he or she has proof that an appointment for the required vaccinations is scheduled with a party authorized to submit proof of the required vaccinations. If the required proof of vaccination is not submitted within 30 days after the student is permitted to attend classes, the student may no longer attend classes until proof of the vaccinations is properly submitted.

Eye Examination

Parents/guardians are encouraged to have their children undergo an eye examination whenever health examinations are required.

Parents/guardians of students entering kindergarten or an Illinois school for the first time shall present proof before October 15 of the current school year that the student received an eye examination within one year prior to entry of kindergarten or the school. A physician licensed to practice medicine in all of its branches, or a licensed optometrist, must perform the required eye examination.

If a student fails to present proof by October 15, the school may hold the student's report card until the student presents proof: (1) of a completed eye examination, or (2) that an eye examination will take place within 60 days after October 15. The Superintendent or designee shall ensure that parents/guardians are notified of this eye examination requirement in compliance with the rules of the IDPH. Schools shall not exclude a student from attending

school due to failure to obtain an eye examination.

Dental Examination

All children in kindergarten and the second and sixth grades must present proof of having been examined by a licensed dentist before May 15 of the current school year in accordance with rules adopted by the IDPH.

If a child in the second or sixth grade fails to present proof by May 15, the school may hold the child's report card until the child presents proof: (1) of a completed dental examination, or (2) that a dental examination will take place within 60 days after May 15. The Superintendent or designee shall ensure that parents/guardians are notified of this dental examination requirement at least 60 days before May 15 of each school year.

Exemptions

In accordance with rules adopted by the IDPH, a student will be exempted from this policy's requirements for:

1. Religious grounds, if the student's parents/guardians present the IDPH's Certificate of Religious Exemption form to the Superintendent or designee. When a Certificate of Religious Exemption form is presented, the Superintendent or designee shall immediately inform the parents/guardians of exclusion procedures pursuant to Board policy 7:280, *Communicable and Chronic Infectious Disease*, and State rules if there is an outbreak of one or more diseases from which the student is not protected.
2. Health examination or immunization requirements on medical grounds, if the examining physician, advanced practice registered nurse, or physician assistant provides written verification.
3. Eye examination requirement, if the student's parents/guardians show an undue burden or lack of access to a physician licensed to practice medicine in all of its branches who provides eye examinations or a licensed optometrist.
4. Dental examination requirement, if the student's parents/guardians show an undue burden or a lack of access to a dentist.

Homeless Child

Any homeless child shall be immediately admitted, even if the child or child's parent/guardian is unable to produce immunization and health records normally required for enrollment. Board policy 6:140, *Education of Homeless Children*, governs the enrollment of homeless children.

LEGAL REF.:

42 U.S.C. §11431 *et seq.*, McKinney-Vento Homeless Assistance Act.

105 ILCS 5/27-8.122-105. and ^{C1}

105 ILCS 45/1-20, Education for Homeless Children Act.

410 ILCS 45/7.1, Lead Poisoning Prevention Act.

410 ILCS 315/2e, Communicable Disease Prevention Act.

23 Ill.Admin.Code §1.530.

77 Ill. Admin.Code Part 664, Socio-Emotional and Developmental Screening.

77 Ill.Admin.Code Part 665, Child and Student Health Examination and Immunization.

77 Ill.Admin.Code Part 690, Control of Notifiable Diseases and Conditions Code.

CROSS REF.: 6:30 (Organization of Instruction), 6:140 (Education of Homeless Children), 6:180 (Extended Instructional Programs), 7:50 (School Admissions and Student Transfers to and From Non-District Schools), 7:280 (Communicable and Chronic Infectious Disease)

ADOPTED: January 29, 2025

Palos Heights SD 128

PRESSPlus Comments

- C1. The Legal References are updated in response to 105 ILCS 5/22-105, titled *Health examinations and immunizations* (formerly 105 ILCS 5/27-8.1), renumbered by P.A. 104-391. **Issue 121, March 2026**

SECTION 7 - STUDENTS**7:185 Teen Dating Violence Prohibited**

Engaging in teen dating violence that takes place at school, on school property, at school-sponsored activities, or in vehicles used for school-provided transportation is prohibited. For purposes of this policy, ~~the term~~ *teen dating violence* occurs whenever a student who is 13 to 19 years of age uses or threatens to use physical, mental, or emotional abuse to control an individual in the dating relationship; or uses or threatens to use sexual violence in the dating relationship.

The Superintendent or designee shall develop and maintain a program to respond to incidents of teen dating violence that:

1. Fully implements and enforces each of the following Board policies:
 - a. 2:260, *Uniform Grievance Procedure*. This policy provides a method for any student, parent/guardian, employee, or community member to file a complaint if he or she believes that the Board of Education, its employees, or its agents have violated his or her rights under the State or federal Constitution, State or federal statute, Board policy, or various enumerated bases.
 - b. 2:265, *Title IX Grievance Procedure*. This policy prohibits a District employee, agent, or student from engaging in sexual harassment in violation of Title IX of the Education Amendments of 1972. Prohibited conduct includes but is not limited to sexual assault, dating violence, domestic violence, and stalking.
 - c. 7:20, *Harassment of Students Prohibited*. This policy prohibits any person, including a District employee, agent, or student, from harassing intimidating, or bullying a student based on the student's actual or perceived characteristics of sex; sexual orientation; gender identity; and gender-related identity or expression (this policy includes more protected statuses).
 - d. 7:180, *Prevention of and Response to Bullying, Intimidation, and Harassment*. This policy prohibits students from engaging in bullying, intimidation, and harassment at school, school-related events and electronically. Prohibited conduct includes threats, stalking, physical violence, sexual harassment, sexual violence, theft, public humiliation, destruction of property, or retaliation for asserting or alleging an act of bullying.
2. Encourages anyone with information about incidents of teen dating violence to report

them to any of the following individuals:

- a. Any school staff member. School staff shall respond to incidents of teen dating violence by following the District's established procedures for the prevention, identification, investigation, and response to bullying and school violence.
 - b. The Nondiscrimination Coordinator, Building Principal, Assistant Building Principal, Dean of Students, or a Complaint Manager identified in policy 7:20, *Harassment of Students Prohibited*.
3. Incorporates age-appropriate instruction in grades 7 through 12, in accordance with the District's comprehensive health education program in Board policy 6:60, *Curriculum Content*. This includes incorporating student social and emotional development into the District's educational program as required by State law and in alignment with Board policy 6:65, *Student Social and Emotional Development*.
 4. Incorporates education for school staff, as recommended by the Nondiscrimination Coordinator, Building Principal, Assistant Building Principal, Dean of Students, or a Complaint Manager.
 5. Notifies students and parents/guardians of this policy.

Incorporated

by Reference: 7:180-AP1, (Prevention, Identification, Investigation, and Response to Bullying)

LEGAL REF.:

105 ILCS 5/27-240^{C1}110/3.10.

CROSS REF.: 2:240 (Board Policy Development), 2:260 (Uniform Grievance Procedure), 2:265 (Title IX Grievance Procedure), 5:100 (Staff Development Program), 5:230 (Maintaining Student Discipline), 6:60 (Curriculum Content), 6:65 (Student Social and Emotional Development), 7:20 (Harassment of Students Prohibited), 7:180 (Prevention of and Response to Bullying, Intimidation, and Harassment), 7:190 (Student Behavior), 7:220 (Bus Conduct), 7:230 (Misconduct by Students with Disabilities), 7:240 (Conduct Code for Participants in Extracurricular Activities)

ADOPTED: August 13, 2025

Palos Heights SD 128

PRESSPlus Comments

- C1. The Legal References are updated in response to 105 ILCS 5/27-240, renumbered by P.A. 104-391. **Issue 121, March 2026**

SECTION 7 - STUDENTS**7:240 Conduct Code for Participants in Extracurricular Activities**

The Superintendent or designee, using input from coaches and sponsors of extracurricular activities, shall develop a conduct code for all participants in extracurricular activities consistent with Board of Education policy and the rules adopted by any association in which the School District maintains a membership. The conduct code shall: (1) require participants in extracurricular activities to conduct themselves as good citizens and exemplars of their school at all times, including after school, on days when school is not in session, and whether on and off school property, and (2) notify participants that failure to abide by it could result in discipline, up to and including removal from the activity. Participants who violate the conduct code will be allowed to give an explanation before being progressively disciplined. . The conduct code shall be reviewed by the Building Principal periodically at his or her discretion and presented to the Board.

Participants in extracurricular activities must abide by the conduct code for the activity and Board policy 7:190, *Student Behavior*. All coaches and sponsors of extracurricular activities shall annually review the conduct code with participants and provide participants with a copy. In addition, coaches and sponsors of interscholastic athletic programs shall provide instruction on steroid abuse prevention to students in grades 7 through 8 participating in these programs.

LEGAL REF.:

Mahanoy Area Sch. Dist. v. B.L., 141 S.Ct. 2038 594 U.S. 180 (2021).^{C1}

Bd. of Educ. of Independent Sch. Dist. No. 92 v. Earls, 536 U.S. 822 (2002).

Vernonia Sch. Dist. 475 v. Acton, 515 U.S. 646 (1995).

Clements v. Bd. of Educ. of Decatur, 133 Ill.App.3d 531 (4th Dist. 1985).

Kevin Jordan v. O'Fallon THSD 203, 302 Ill.App.3d 1070 (5th Dist. 1999).

Todd v. Rush County Schs., 133 F.3d 984 (7th Cir. 1998).

105 ILCS 5/24-24, and 5/27-255(d)23.3, and 25/2.

CROSS REF.: 5:280 (Duties and Qualifications), 6:190 (Extracurricular and Co-Curricular Activities), 7:190 (Student Behavior), 7:300 (Extracurricular Athletics)

ADOPTED: March 9, 2022

Palos Heights SD 128

PRESSPlus Comments

- C1. The Legal References are updated in response to 105 ILCS 5/27-255(d), renumbered by P.A. 104-391, and for continuous improvement. **Issue 121, March 2026**

SECTION 7 - STUDENTS**7:260 Exemption from Physical Education**

In order to be excused from participation in physical education, a student must present an appropriate excuse from his or her parent/guardian or from a person licensed under the Medical Practice Act. The excuse may be based on medical or religious prohibitions. An excuse because of medical reasons must include a signed statement from a person licensed under the Medical Practice Act that corroborates the medical reason for the request. An excuse based on religious reasons must include a signed statement from a member of the clergy that corroborates the religious reason for the request. Upon written notice from a student's parent/guardian, a student will be excused from engaging in the physical activity components of physical education during a period of religious fasting.

Special activities in physical education will be provided for a student whose physical or emotional condition, as determined by a person licensed under the Medical Practice Act, prevents his or her participation in the physical education course.

State law prohibits a school board from honoring parental excuses based upon a student's participation in athletic training, activities, or competitions conducted outside the auspices of the School District.

A student who is eligible for special education may be excused from physical education courses in either of the following situations:

1. He or she (a) is in grades 3-8, (b) his or her IEP requires that special education support and services be provided during physical education time, and (c) the parent/guardian agrees or the IEP team makes the determination; or
2. He or she (a) has an IEP, (b) is participating in an adaptive athletic program outside of the school setting, and (c) the parent/guardian documents the student's participation as required by the Superintendent or designee.

A student requiring adapted physical education must receive that service in accordance with his or her Individualized Educational Program/Plan (IEP).

Students in grades 7 and 8 may submit a written request to the Building Principal to be excused from physical education courses because of his or her ongoing participation in an interscholastic or extracurricular athletic program. The Building Principal will evaluate requests on a case-by-case basis.

The Superintendent or designee shall maintain records showing that the criteria set forth in this policy were applied to the student's individual circumstances, as appropriate.

Students who have been excused from physical education shall return to the course as soon as practical. The following considerations will be used to determine when a student shall return to a physical education course:

1. The time of year when the student's participation ceases; and
2. The student's class schedule.

LEGAL REF.:

105 ILCS 5/27-~~7106~~.^{C1}

[225 ILCS 60/](#), Medical Practice Act.

[23 Ill.Admin.Code §1.420](#)(p) and [§1.425](#)(d), (e).

CROSS REF.: 6:60 (Curriculum Content)

ADOPTED: March 9, 2022

Palos Heights SD 128

PRESSPlus Comments

C1. The Legal References are updated in response to 105 ILCS 5/27-710, renumbered by P.A. 104-391. **Issue 121, March 2026**

SECTION 7 - STUDENTS**7:300 Extracurricular Athletics**

Student participation in school-sponsored extracurricular athletic activities is contingent upon the following:

1. The student must meet the academic criteria set forth in Board policy 6:190, *Extracurricular and Co-Curricular Activities*.
2. A parent/guardian of the student must provide written permission for the student's participation, giving the District full waiver of responsibility of the risks involved.
3. The student must present a current certificate of physical fitness issued by a licensed physician, an advanced practice registered nurse, or a physician assistant. The ***Pre-Participation Physical Examination Form***, offered by the Illinois High School Association and the Illinois Elementary School Association, is the preferred certificate of physical fitness.
4. The student must show proof of accident insurance coverage either by an insurance^{C1} policy purchased through the District-approved insurance plan or a parent/guardian written statement that the student is covered under a family insurance plan~~policy~~.
5. The student must agree to follow all conduct rules and the coaches' instructions.
6. The student and his or her parent(s)/guardian(s) must: (a) comply with the eligibility rules of, and complete any forms required by, any sponsoring association (such as, the Illinois Elementary School Association, the Illinois High School Association, or the Southern Illinois Junior High School Athletic Association), and (b) complete all forms required by the District including, without limitation, signing an acknowledgment of receiving information about ~~the Board's concussion~~ policy 7:305, *Student Athlete Concussions and Head Injuries*.

The Superintendent or designee (1) is authorized to impose additional requirements for a student to participate in extracurricular athletics, provided the requirement(s) comply with Board policy 7:10, *Equal Educational Opportunities*, and (2) shall maintain the necessary records to ensure student compliance with this policy.

LEGAL REF.:

105 ILCS 5/10-20.30, and 5/22-80, and 25/2.^{C2}

23 III.Admin.Code §1.530(b).

CROSS REF.: 4:100 (Insurance Management), 4:170 (Safety), 6:190 (Extracurricular and Co-Curricular Activities), 7:10 (Equal Educational Opportunities), 7:20 (Harassment of Students Prohibited), 7:240 (Conduct Code for Participants in Extracurricular Activities), 7:305 (Student Concussions and Head Injuries), 7:340 (Student Records)

ADOPTED: September 17, 2025

Palos Heights SD 128

PRESSPlus Comments

- C1. Updated throughout for continuous improvement. **Issue 121, March 2026**
- C2. The Legal References are updated. **Issue 121, March 2026**

SECTION 8 - COMMUNITY RELATIONS**8:90 Parent Organizations and Booster Clubs**

Parent organizations and booster clubs are invaluable resources to the District's schools. While parent organizations and booster clubs have no administrative authority and cannot determine **DistrictBoard**^{C1} policy, the Board of Education welcomes their suggestions and assistance.

Parent organizations and booster clubs may be recognized by the Board and permitted to use the District's name, a District school's name, **or** a District school's team name, or any logo attributable to the District provided they first receive the Superintendent or designee's express written consent. Consent to use one of the above-mentioned names or logos will generally be granted if the organization or club has by-laws containing the following:

1. The organization's or club's name and purpose, such as, to enhance students' educational experiences, to help meet educational needs of students, to provide extra athletic benefits to students, to assist specific sports teams or academic clubs through financial support, or to enrich extracurricular activities.
2. The rules and procedures under which it operates.
3. An agreement to adhere to all Board policies and administrative procedures.
4. A statement that membership is open and unrestricted, meaning that membership is open to all parents/guardians of students enrolled in the school, District staff, and community members.
5. A statement that the District is not, and will not be, responsible for the organization's or club's business or the conduct of its members, including on any organization or club websites or social media accounts.
6. An agreement to maintain and protect its own finances.
7. A recognition that money given to a school cannot be earmarked for any particular expense. Booster clubs may make recommendations, but cash or other valuable consideration must be given to the District to use at its discretion. The Board's legal obligation to comply with Title IX by providing equal athletic opportunity for members of both genders will supersede an organization or club's recommendation.

Permission to use one of the above-mentioned names or logos may be rescinded at any time and does not constitute permission to act as the District's representative. At no time does the District accept responsibility for the actions of any parent organization or booster

club regardless of whether it was recognized and/or permitted to use any of the above-mentioned names or logos. The Superintendent shall designate an administrative staff member to serve as the recognized liaison to parent organizations or booster clubs. The liaison will serve as a resource person and provide information about school programs, resources, policies, problems, concerns, and emerging issues. Building staff will be encouraged to participate in the organizations.

CROSS REF.: 8:80 (Gifts to the District)

ADOPTED: November 10, 2021

Palos Heights SD 128

PRESSPlus Comments

- C1. Updated throughout in response to a PRESS five-year review. PRESS Editors have a quality assurance goal to ensure that a review of each piece of the 1500+ page IASB PRESS Policy Reference Manual occurs once every five years. **Issue 121, March 2026**

Document Status: Draft Update - Rewritten

Communications To and From the Board

2:140-E Exhibit - Guidance for Board Member Communications, Including Email Use

The Open Meetings Act (OMA) requires the Board of Education to discuss District business only at a properly noticed Board meeting.^{C1} 5 ILCS 120/. Other than during a Board meeting, a majority or more of a Board quorum may not engage in contemporaneous interactive communication, whether in person or electronically, to discuss District business. This guidance assumes a Board has seven members and covers issues arising from Board policy 2:140, *Communications To and From the Board*.

Note: *Public records* stored by board members on personal devices (i.e., texts) or personal email accounts pose significant logistical and administrative challenges for public record preservation and certain FOIA requests. It is therefore a best practice for board members to utilize District-issued devices or District-issued email addresses for electronic communications that qualify as public records under the Freedom of Information Act (FOIA) or the Local Records Act (LRA). For that reason, the examples in this guidance focus primarily on board member email use and District-issued devices.

Communications Between or Among Board Members and/or the Superintendent Outside of a Properly Noticed Board Meeting

1. The Superintendent or designee is permitted to email information to Board members. For example, the Superintendent may email Board meeting agendas and supporting information to Board members. When responding to a single Board member's request, the Superintendent should copy all other Board members and include a do not reply all/forward alert to the group, such as: **"BOARD MEMBER ALERT: This email is in response to a request. Do not reply or forward to the group but only to the sender."** Alternatively, the Superintendent may blind carbon copy (bcc) all other board members (preventing them from replying to all) and include a similar alert to the group, such as: **"BOARD MEMBER ALERT: This email is in response to a request. To prevent replies or forwards to the group, all board members are blind carbon copied on this email. Only reply to the sender."**
2. Board members are permitted to discuss any topic other than District business with each other, whether in person or by telephone, email, text, or other electronic means, regardless of the number of members participating in the discussion. For example,

they may discuss sports, work, or current events.

3. Board members are permitted to provide information to each other, whether in person or by telephone, email, text, or other electronic means, that relates to District business but is non-deliberative and non-substantive. Examples of this type of communication include scheduling meetings and confirming receipt of information.
4. A Board member is not permitted to discuss District business with more than one other Board member at a time, whether in person or by telephone, email, text, or other electronic means. Stated another way, a Board member may discuss District business in person or by telephone, email, text, or other electronic means with only one other Board member at a time.
5. A Board member should not facilitate interactive communication by discussing District business in a series of visits with, or telephone calls, emails, texts, or other electronic communications to, Board members individually.
6. A Board member should include a do not reply all/forward alert when emailing a message concerning District business to more than one other Board member. The following is an example of such an alert: **“BOARD MEMBER ALERT: This email is not for interactive discussion purposes. The recipient should not reply to it or forward it to any other individual.”** Alternatively, the board member may bcc the other board members and include a similar alert to the other board members, such as **“BOARD MEMBER ALERT: This email is not for interactive discussion purposes. To prevent replies or forwards to the group, all board members are blind carbon copied on this email. The recipient should not reply to it or forward it to another individual.”**
7. Board members should not forward email received from another Board member.

When Must the Electronic Communications Sent or Received by Individual Board Members Be Disclosed Pursuant to a Freedom of Information Act (FOIA) Request?

An electronic communication must be disclosed if it is a public record as defined by FOIA, unless a specific exemption applies. A *public record* is any recorded information “pertaining to the transaction of public business, regardless of physical form or characteristics, having been prepared by or for, or having been or being used by, received by, in the possession of, or under the control of any public body.” 5 ILCS 140/2, amended by P.A. 104-438. Public records do not include *junk mail*. Junk mail includes unsolicited commercial electronic communications sent to the District that it does not respond to. *Id.* Email or other electronic communications sent or received by an individual Board member may be, depending on the content and circumstances, subject to disclosure as a public record (unless a FOIA exemption is applicable).

If a Board member uses a District-provided device or email address to discuss public business, the electronic communication is subject to disclosure under FOIA, barring an

applicable exemption. If a Board member uses a private device and email address, the communication is subject to FOIA if it satisfies this test:

First, the communication pertains to the transaction of public business, and

Second, the communication was: (1) prepared by a public body, (2) prepared for a public body, (3) used by a public body, (4) received by a public body, (5) possessed by a public body, and/or (6) controlled by a public body.

This test is from the appellate court decision in City of Champaign v. Madigan, 992 N.E.2d 629 (Ill. App. Ct. 2013).

The following examples describe FOIA's treatment of electronic communications:

1. If an electronic communication does not pertain to public business, it is not a public record and is not subject to a FOIA request.
2. An electronic communication pertaining to public business that is:
 - a. Sent and/or received by an individual Board member using a personal electronic device and personal email address while he or she is at home or work would not be a public record. Individual Board members, alone, cannot conduct school District business. As stated earlier, emails among a majority or more of a Board-quorum violate OMA and, thus, are subject to disclosure during proceedings to enforce OMA.
 - b. Sent and/or received by an individual Board member on a District-issued device or District-issued email address **will be a public record** and subject to FOIA. The electronic communication is under the control of the District.
 - c. Received by an individual Board member on a personal electronic device and then forwarded by the Board member to a District-owned device or server **will be a public record** and subject to FOIA. The electronic communication is under the control of the District.
 - d. Received by an individual Board member using a personal electronic device and personal email address, and then forwarded by the Board member to enough members to constitute a majority or more of a Board-quorum **will be a public record** and subject to FOIA. The electronic communication is in the District's possession.
 - e. Either sent to or from a Board member's personal electronic device during a Board meeting **will be a public record** and subject to FOIA. The electronic communication is in the District's possession because Board members were functioning collectively as a public body.

The District's Freedom of Information Officer and/or Board Attorney will help determine whether a specific communication must be disclosed pursuant to a FOIA request.

When Must Electronic Communications Be Retained?

Electronic communications that qualify under FOIA as *public records* will need to be stored pursuant to the Local Records Act (LRA), only if it is evidence of the District's organization, function, policies, procedures, or activities or contains informational data appropriate for preservation. 50 ILCS 205/. An example is any email from a Board officer concerning a decision made in his or her capacity as an officer. If a Board member uses his or her personal email, he or she must copy this type of email to the appropriate District office where it will be stored. If made available, Board members should use their email accounts provided by the District, and the District will automatically store the official record messages. The District will delete these official record messages as provided in an applicable, approved **retention schedule**. Of course, email pertaining to public business that is sent or received by a Board Member using a District-issued device or email address will be subject to FOIA, even if the email does not need to be retained under the LRA.

Important: Do not destroy any electronic communication concerning a topic that is being litigated without obtaining the Board Attorney's direction. In federal lawsuits, there is an automatic discovery of virtually all types of electronically created or stored data that might be relevant. Attorneys will generally advise their clients at the beginning of a legal proceeding that they must not destroy any electronic records that might be relevant. This is referred to as a *litigation hold*. For more discussion of a litigation hold, see administrative procedure 2:250-AP2, *Protocols for Record Preservation and Development of Retention Schedules*. In addition, any person who knowingly with the intent to defraud any party destroys, removes, or conceals any public record commits a Class 4 felony. 50 ILCS 205/4.

Palos Heights SD 128

PRESSPlus Comments

- C1. Rewritten for PRESS Plus in response to the Freedom of Information Act (FOIA), 5 ILCS 140/2, amended by P.A. 104-438, excluding *junk mail* from the definition of *public record*, and for continuous improvement. This exhibit is not a substitute for legal advice. Use it after having a discussion with the board attorney. A redlined version showing the changes made is available at PRESS Online by logging in at www.iasb.com. **Issue 121, March 2026**

Document Status: Review and Monitoring

SECTION 7 - STUDENTS

7:220 Bus Conduct

All students must follow the District's *School Bus Safety Rules*.^{C1}

School Bus Suspensions

The Superintendent, or any designee as permitted in the School Code, is authorized to suspend a student from riding the school bus for up to 10 consecutive school days for engaging in gross disobedience or misconduct, including but not limited to, the following:

1. Prohibited student conduct as defined in Board of Education policy 7:190, *Student Behavior*.
2. Willful injury or threat of injury to a bus driver or to another rider.
3. Willful and/or repeated defacement of the bus.
4. Repeated use of profanity.
5. Repeated willful disobedience of a directive from a bus driver or other supervisor.
6. Such other behavior as the Superintendent or designee deems to threaten the safe operation of the bus and/or its occupants.

If a student is suspended from riding the bus for gross disobedience or misconduct on a bus, the Board of Education may suspend the student from riding the school bus for a period in excess of 10 days for safety reasons. The District's regular suspension procedures shall be used to suspend a student's privilege to ride a school bus.

Academic Credit for Missed Classes During School Bus Suspension

A student suspended from riding the bus who does not have alternate transportation to school shall have the opportunity to complete or make up work for equivalent academic credit. It shall be the responsibility of the student's parent or guardian to notify the school that the student does not have alternate transportation.

Electronic Recordings on School Buses

Electronic visual and audio recordings may be used on school buses to monitor conduct and to promote and maintain a safe environment for students and employees when transportation is provided for any school related activity. Notice of electronic recordings shall

be displayed on the exterior of the vehicle's entrance door and front interior bulkhead in compliance with State law and the rules of the Illinois Department of Transportation, Division of Traffic Safety.

Students are prohibited from tampering with electronic recording devices. Students who violate this policy shall be disciplined in accordance with the Board's discipline policy and shall reimburse the School District for any necessary repairs or replacement.

LEGAL REF.:

Family Educational Rights and Privacy Act, [20 U.S.C. §1232g](#); [34 C.F.R. Part 99](#).

[105 ILCS 5/10-20.14](#), [5/10-22.6](#), and [10/](#).

[720 ILCS 5/14-3](#)(m).

[23 Ill.Admin.Code Part 375](#), Student Records.

CROSS REF.: 4:110 (Transportation), 4:170 (Safety), 7:130 (Student Rights and Responsibilities), 7:170 (Vandalism), 7:190 (Student Behavior), 7:200 (Suspension Procedures), 7:230 (Misconduct by Students with Disabilities), 7:340 (Student Records)

ADOPTED: September 15, 2021

Palos Heights SD 128

PRESSPlus Comments

C1. This policy is suggested to be reviewed by the Board. According to policy 2:240, *Board Policy Development*, "[t]he Board will periodically review its policies for relevancy, monitor its policies for effectiveness, and consider whether any modifications are required." IASB suggests that each policy in the Board's policy manual be reviewed at a minimum of every five years. As part of the review, the Board may choose to:

- Compare the adopted version to the current PRESS sample (available at PRESS Online by logging in at www.iasb.com), discussing any differences and/or options noted in the footnotes to determine whether local changes are necessary
- Update the policy language due to changes in local conditions
- Make no changes, but update the adoption date to reflect that the policy has been reviewed and re-adopted

Issue 121, March 2026

Document Status: Review and Monitoring

SECTION 7 - STUDENTS

7:230 Misconduct by Students with Disabilities

Behavioral Interventions^{C1}

Behavioral interventions shall be used with students with disabilities to promote and strengthen desirable behaviors and reduce identified inappropriate behaviors. The Board of Education will establish and maintain a committee to develop, implement, and monitor procedures on the use of behavioral interventions for children with disabilities.

Discipline of Special Education Students

The District shall comply with the Individuals With Disabilities Education Improvement Act of 2004 and the Illinois State Board of Education's *Special Education* rules when disciplining special education students. No special education student shall be expelled if the student's particular act of gross disobedience or misconduct is a manifestation of his or her disability.

LEGAL REF.:

Individuals With Disabilities Education Improvement Act of 2004, [20 U.S.C. §§1412, 1413, and 1415](#).

Gun-Free Schools Act, [20 U.S.C. §7151](#) *et seq.*

[34 C.F.R. §§300.101, 300.530 - 300.536](#).

[105 ILCS 5/10-22.6](#) and [5/14-8.05](#).

[23 Ill.Admin.Code §226.400](#).

[Honig v. Doe](#), 108 S.Ct. 592 (1988).

CROSS REF.: 2:150 (Committees), 6:120 (Education of Children with Disabilities), 7:130 (Student Rights and Responsibilities), 7:190 (Student Behavior), 7:200 (Suspension Procedures), 7:210 (Expulsion Procedures), 7:220 (Bus Conduct)

ADOPTED: September 15, 2021

PRESSPlus Comments

- C1. This policy is suggested to be reviewed by the Board. According to policy 2:240, *Board Policy Development*, "[t]he Board will periodically review its policies for relevancy, monitor its policies for effectiveness, and consider whether any modifications are required." IASB suggests that each policy in the Board's policy manual be reviewed at a minimum of every five years. As part of the review, the Board may choose to:
- Compare the adopted version to the current PRESS sample (available at PRESS Online by logging in at www.iasb.com), discussing any differences and/or options noted in the footnotes to determine whether local changes are necessary
 - Update the policy language due to changes in local conditions
 - Make no changes, but update the adoption date to reflect that the policy has been reviewed and re-adopted

Issue 121, March 2026

Document Status: Review and Monitoring

SECTION 7 - STUDENTS

7:280 Communicable and Chronic Infectious Disease

A student with or carrying a communicable and/or chronic infectious disease has all rights, privileges, and services provided by law and the Board of Education's policies. The Superintendent will develop procedures to safeguard these rights while managing health and safety concerns.^{C1}

LEGAL REF.:

[105 ILCS 5/10-21.11.](#)

[23 Ill.Admin.Code §§ 1.610 and 226.300.](#)

[77 Ill.Admin.Code Part 690.](#)

[20 U.S.C. §1400](#) *et seq.*, Individuals With Disabilities Education Improvement Act of 2004.

[29 U.S.C. §794](#)(a), Rehabilitation Act of 1973, Section 504.

ADOPTED: September 15, 2021

Palos Heights SD 128

PRESSPlus Comments

C1. This policy is suggested to be reviewed by the Board. According to policy 2:240, *Board Policy Development*, "[t]he Board will periodically review its policies for relevancy, monitor its policies for effectiveness, and consider whether any modifications are required." IASB suggests that each policy in the Board's policy manual be reviewed at a minimum of every five years. As part of the review, the Board may choose to:

- Compare the adopted version to the current PRESS sample (available at PRESS Online by logging in at www.iasb.com), discussing any differences and/or options noted in the footnotes to determine whether local changes are necessary
- Update the policy language due to changes in local conditions
- Make no changes, but update the adoption date to reflect that the policy has been reviewed and re-adopted

Issue 121, March 2026

SECTION 7 - STUDENTS

7:180 Prevention of and Response to Bullying, Intimidation, and Harassment

Bullying, intimidation, and harassment diminish a student's ability to learn and a school's ability to educate. Preventing students from engaging in these disruptive behaviors and providing all students equal access to a safe, non-hostile learning environment are important District goals.

Bullying on the basis of actual or perceived race, color, religion, sex, national origin, ancestry, physical appearance, socioeconomic status, academic status, pregnancy, parenting status, homelessness, age, marital status, physical or mental disability, military status, sexual orientation, gender-related identity or expression, unfavorable discharge from military service, order of protection status, association with a person or group with one or more of the aforementioned actual or perceived characteristics, or any other distinguishing characteristic **is prohibited** in each of the following situations:

1. During any school-sponsored education program or activity.
2. While in school, on school property, on school buses or other school vehicles, at designated school bus stops waiting for the school bus, or at school-sponsored or school-sanctioned events or activities.
3. Through the transmission of information from a school computer, a school computer network, or other similar electronic school equipment.
4. Through the transmission of information from a computer that is accessed at a non-school-related location, activity, function, or program or from the use of technology or an electronic device that is not owned, leased, or used by the School District or school, if the bullying causes a substantial disruption to the educational process or orderly operation of a school. This paragraph (item #4) applies only when a school administrator or teacher receives a report that bullying through this means has occurred; it does not require staff members to monitor any non-school-related activity, function, or program.

Definitions from [105 ILCS 5/22-110](#)

Artificial intelligence means a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. *Artificial intelligence* includes generative artificial intelligence.

Bullying includes *cyberbullying* and means any severe or pervasive physical or verbal act or conduct, including communications made in writing or electronically, directed toward a student or students that has or can be reasonably predicted to have the effect of one or more of the following:

1. Placing the student or students in reasonable fear of harm to the student's or students' person or property;
2. Causing a substantially detrimental effect on the student's or students' physical or mental health;
3. Substantially interfering with the student's or students' academic performance; or
4. Substantially interfering with the student's or students' ability to participate in or benefit from the services, activities, or privileges provided by a school.

Bullying may take various forms, including without limitation one or more of the following: harassment, threats, intimidation, stalking, physical violence, sexual harassment, sexual violence, posting or distributing sexually explicit images, theft, public humiliation, destruction of property, or retaliation for asserting or alleging an act of bullying. This list is meant to be illustrative and non-exhaustive.

Cyberbullying means bullying through the use of technology or any electronic communication, including without limitation any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic system, photo-electronic system, or photo-optical system, including without limitation electronic mail, Internet communications, instant messages, or facsimile communications. *Cyberbullying* includes the creation of a webpage or weblog in which the creator assumes the identity of another person or the knowing impersonation of another person as the author of posted content or messages if the creation or impersonation creates any of the effects enumerated in the definition of *bullying*. *Cyberbullying* also includes the distribution by electronic means of a communication to more than one person or the posting of material on an electronic medium that may be accessed by one or more persons if the distribution or posting creates any of the effects enumerated in the definition of *bullying*. *Cyberbullying* also includes the posting or distribution of an unauthorized digital replica by electronic means if the posting or distribution creates any of the effects enumerated in the definition of *bullying*.

Digital replica means a newly created, electronic representation of the identity of an actual individual created using a computer, algorithm, software, tool, artificial intelligence, or other technology that is fixed in a sound recording or audiovisual work in which that individual did not actually perform or appear and that is so realistic that a reasonable observer would believe it is a performance by the individual being portrayed and no other individual.

Restorative measures means a continuum of school-based alternatives to exclusionary discipline, such as suspensions and expulsions, that: (i) are adapted to the particular needs of the school and community, (ii) contribute to maintaining school safety, (iii) protect the integrity of a positive and productive learning climate, (iv) teach students the personal and interpersonal skills they will need to be successful in school and society, (v) serve to build and restore relationships among students, families, schools, and communities, (vi) reduce the likelihood of future disruption by balancing accountability with an understanding of students' behavioral health needs in order to keep students in school, and (vii) increase student accountability if the incident of bullying is based on religion, race, ethnicity, or any other category that is identified in the Ill. Human Rights Act.

School personnel means persons employed by, on contract with, or who volunteer in a school district, including without limitation school and school district administrators, teachers, school social workers, school counselors, school psychologists, school nurses, cafeteria workers, custodians, bus drivers, school resource officers, and security guards.

Unauthorized digital replica means the use of a digital replica of an individual without the consent of the depicted individual.

Bullying Prevention and Response Plan

The Superintendent or designee shall develop and maintain a bullying prevention and response plan that advances the District's goal of providing all students with a safe learning environment free of bullying and harassment. This plan must be consistent with the requirements listed below.

1. The District uses the definition of *bullying* as provided in this policy.
2. Bullying is contrary to State law and the policy of this District. However, nothing in the District's bullying prevention and response plan is intended to infringe upon any right to exercise free expression or the free exercise of religion or religiously based views protected under the [First Amendment to the U.S. Constitution](#) or under [Section 3 of Article I of the Illinois Constitution](#).
3. Students are encouraged to immediately report bullying. A report may be made orally or in writing to the Nondiscrimination Coordinator, Title IX Coordinator, Building Principal, Assistant Building Principal, Dean of Students, a Complaint Manager, or any staff member with whom the student is comfortable speaking. Anyone, including staff members and parents/guardians, who has information about actual or threatened bullying is encouraged to report it to the District named officials or any staff member. The District named officials and all staff members are available for help with a bully or to make a report about bullying. Anonymous reports are also accepted; however, this shall not be construed to permit formal disciplinary action

solely on the basis of an anonymous report.

Nondiscrimination Coordinator:

Title IX Coordinator:

~~Merryl Brownlow~~

~~Merryl Brownlow~~

Jason Smit

Jason Smit

12809 S. McVickers Avenue

12809 S. McVickers Avenue

Palos Heights, IL 60463

Palos Heights, IL 60463

jsmit@palos128.org

jsmit@palos128.org

~~mbrownlow@palos128.org~~

~~mbrownlow@palos128.org~~

708-597-9040

708-597-9040

Complaint Managers:

~~Merryl Brownlow~~

Jason Smit

Mary Kate Moroney

12809 S. McVickers Avenue

12809 S. McVickers Avenue

Palos Heights, IL 60463

Palos Heights, IL 60463

mmoroney@palos128.org

~~mbrownlow@palos128.org~~

jsmit@palos128.org

708-597-9040

708-597-9040

4. Consistent with federal and State laws and rules governing student privacy rights, the parents/guardians of all students involved in an alleged incident of bullying will be

notified of such, along with threats, suggestions, or instances of self-harm determined to be the result of bullying, within 24 hours after the school's administration is made aware of the student's involvement in the incident. As appropriate, the school's administration shall also discuss the availability of social work services, counseling, school psychological services, other interventions, and restorative measures. The school shall make diligent efforts to notify a parent or legal guardian, utilizing all contact information the school has available or that can be reasonably obtained within the 24-hour period.

5. The Superintendent or designee shall promptly investigate and address reports of bullying, by, among other things:
 - a. Making all reasonable efforts to complete the investigation within 10 school days after the date the report of a bullying incident was received and taking into consideration additional relevant information received during the course of the investigation about the reported bullying incident.
 - b. Involving appropriate school support personnel and other staff persons with knowledge, experience, and training on bullying prevention, as deemed appropriate, in the investigation process.
 - c. Notifying the Building Principal or school administrator or designee of the reported incident of bullying as soon as possible after the report is received.
 - d. Consistent with federal and State laws and rules governing student privacy rights, providing parents/guardians of the students who are parties to the investigation information about the investigation and an opportunity to meet with the Building Principal or school administrator or his or her designee to discuss the investigation, the findings of the investigation, and the actions taken to address the reported incident of bullying.

The Superintendent or designee shall investigate whether a reported incident of bullying is within the permissible scope of the District's jurisdiction and shall require that the District provide the victim with information regarding services that are available within the District and community, such as counseling, support services, and other programs.

6. The Superintendent or designee shall use interventions to address bullying, that may include, but are not limited to, school social work services, restorative measures, social-emotional skill building, counseling, school psychological services, and community-based services.
7. A reprisal or retaliation against any person who reports an act of bullying **is prohibited**. Any person's act of reprisal or retaliation will be subject to disciplinary action, up to and including discharge with regard to employees, or suspension and/or

expulsion with regard to students.

8. A student will not be punished for reporting bullying or supplying information, even if the District's investigation concludes that no bullying occurred. However, a person who is found to have falsely accused another of bullying, as a means of retaliation, as a means of bullying, or provided false information will be treated as either: (a) *bullying*, (b) student discipline up to and including suspension and/or expulsion, and/or (c) both (a) and (b) for purposes of determining any consequences or other appropriate remedial actions.
9. The District's bullying prevention and response plan is based on the engagement of a range of school stakeholders, including students and parents/guardians.
10. The Superintendent or designee shall post this policy on the District's publicly accessible website, if any, and include it in the student handbook, and, where applicable, post it where other policies, rules, and standards of conduct are currently posted. The policy must be distributed annually to parents/guardians, students, and school personnel (including new employees when hired), and must also be provided periodically throughout the school year to students and faculty.
11. Pursuant to State law and Board policy 2:240, *Board Policy Development*, the Board monitors this policy every two years by conducting a review and re-evaluation of this policy to make any necessary and appropriate revisions. The Superintendent or designee shall assist the Board with its re-evaluation and assessment of this policy's outcomes and effectiveness. Updates to this policy will reflect any necessary and appropriate revisions. This process shall include, without limitation:
 - a. The frequency of victimization;
 - b. Student, staff, and family observations of safety at a school;
 - c. Identification of areas of a school where bullying occurs;
 - d. The types of bullying utilized; and
 - e. Bystander intervention or participation.

The evaluation process may use relevant data and information that the District already collects for other purposes. Acceptable documentation to satisfy the re-evaluated policy submission include one of the following:

- 1) An updated version of the policy with the amendment/modification date specifying the date of adoption (indicated by month, date, and year) included in the reference portion of the policy;
- 2) If no revisions are deemed necessary, a copy of Board minutes indicating that the policy was re-evaluated and no changes were deemed to be necessary; or

- 3) A signed statement from the Board President indicating that the Board re-evaluated the policy and no changes to it were necessary.

The Superintendent or designee must post the information developed as a result of the policy re-evaluation on the District's website, or if a website is not available, the information must be provided to school administrators, Board members, school personnel, parents/guardians, and students. Reviews and re-evaluations in years they are due must be submitted to ISBE by September 30.

12. The Superintendent or designee shall fully implement the Board policies, including without limitation, the following:
 - a. 2:260, *Uniform Grievance Procedure*. A student may use this policy to complain about bullying.
 - b. 2:265, *Title IX Grievance Procedure*. Any person may use this policy to complain about sexual harassment in violation of Title IX of the Education Amendments of 1972.
 - c. 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*. Any person may use this policy to complain about discrimination or harassment on the basis of race, color, or national origin in violation of Title VI of the Civil Rights Act of 1964 and/or the Illinois Human Rights Act.
 - d. 6:60, *Curriculum Content*. Bullying prevention and character instruction is provided in all grades in accordance with State law.
 - e. 6:65, *Student Social and Emotional Development*. Student social and emotional development is incorporated into the District's educational program as required by State law.
 - f. 6:235, *Access to Electronic Networks*. This policy states that the use of the District's electronic networks is limited to: (1) support of education and/or research, or (2) a legitimate business use.
 - g. 7:20, *Harassment of Students Prohibited*. This policy prohibits *any* person from harassing, intimidating, or bullying a student based on an identified actual or perceived characteristic (the list of characteristics in 7:20 is the same as the list in this policy).
 - h. 7:185, *Teen Dating Violence Prohibited*. This policy prohibits teen dating violence on school property, at school sponsored activities, and in vehicles used for school-provided transportation.
 - i. 7:190, *Student Behavior*. This policy prohibits, and provides consequences for, hazing, bullying, or other aggressive behaviors, or urging other students to engage in such conduct.

- j. 7:310, *Restrictions on Publications; Elementary Schools*. This policy prohibits students from and provides consequences for: (1) accessing and/or distributing at school any written, printed, or electronic material, including material from the Internet, that will cause substantial disruption of the proper and orderly operation and discipline of the school or school activities, and (2) creating and/or distributing written, printed, or electronic material, including photographic material and blogs, that causes substantial disruption to school operations or interferes with the rights of other students or staff members.

LEGAL REF.:

[105 ILCS 5/10-20.14](#), [5/10-22.6\(b-20\)](#), [5/22-110](#), and [5/24-24](#).

[405 ILCS 49/](#), Children's Mental Health Act.

[775 ILCS 5/1-103](#), Ill. Human Rights Act.

[23 Ill.Admin.Code §§1.240](#), [1.280](#), and [1.295](#).

CROSS REF.: 2:240 (Board Policy Development), 2:260 (Uniform Grievance Procedure), 2:265 (Title IX Grievance Procedure), 2:270 (Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited), 4:170 (Safety), 5:230 (Maintaining Student Discipline), 6:60 (Curriculum Content), 6:65 (Student Social and Emotional Development), 6:235 (Access to Electronic Networks), 7:20 (Harassment of Students Prohibited), 7:185 (Teen Dating Violence Prohibited), 7:190 (Student Behavior), 7:220 (Bus Conduct), 7:230 (Misconduct by Students with Disabilities), 7:240 (Conduct Code for Participants in Extracurricular Activities), 7:285 (Anaphylaxis Prevention, Response, and Management Program), 7:310 (Restrictions on Publications; Elementary Schools)

ADOPTED: January 21, 2026

Palos Heights SD 128

General Personnel

5:20 Workplace Harassment Prohibited

The School District expects the workplace environment to be productive, respectful, and free of unlawful discrimination, including harassment. District employees shall not engage in harassment or abusive conduct on the basis of an individual's actual or perceived race, color, religion, national origin, ancestry, sex, sexual orientation, age, citizenship status, work authorization status, disability, pregnancy, marital status, family responsibilities, reproductive health decisions, order of protection status, military status, or unfavorable discharge from military service, nor shall they engage in harassment or abusive conduct on the basis of an individual's other protected status identified in Board policy 5:10, *Equal Employment Opportunity and Minority Recruitment*. Harassment of students, including, but not limited to, sexual harassment, is prohibited by Board policies 2:260, *Uniform Grievance Procedure*; 2:265, *Title IX Grievance Procedure*; 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*; 7:20, *Harassment of Students Prohibited*; 7:180, *Prevention of and Response to Bullying, Intimidation, and Harassment*; and 7:185, *Teen Dating Violence Prohibited*.

The District will take remedial and corrective action to address unlawful workplace harassment, including sexual harassment.

Sexual Harassment Prohibited

The District shall provide a workplace environment free of verbal, physical, or other conduct or communications constituting harassment on the basis of sex as defined and otherwise prohibited by State and federal law. The District provides annual sexual harassment prevention training in accordance with State law.

District employees shall not make unwelcome sexual advances or request sexual favors or engage in any unwelcome conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. Sexual harassment prohibited by this policy includes, but is not limited to, verbal, physical, or other conduct. The terms intimidating, hostile, or offensive include, but are not limited to, conduct that has the effect of humiliation, embarrassment, or discomfort. Sexual harassment will be evaluated in light of all the circumstances.

Making a Report or Complaint

Employees and *nonemployees* (persons who are not otherwise employees and are directly performing services for the District pursuant to a contract with the District, including contractors, and consultants) are encouraged to promptly report information regarding violations of this policy. Individuals may choose to report to a person of the individual's same gender. Every effort should be made to file such reports or complaints as soon as possible, while facts are known and potential witnesses are available.

Employees are encouraged to promptly report information regarding violations of this policy. Employees may choose to report to a person of the employee's same gender. Every effort should be made to file such complaints as soon as possible, while facts are known and potential witnesses are available.

Aggrieved individuals, if they feel comfortable doing so, should directly inform the person engaging in the harassing conduct or communication that such conduct or communication is offensive and must stop.

Whom to Contact with a Report or Complaint

An employee should report claims of harassment, including making a confidential report, to any of the following: his/her immediate supervisor, the Building Principal, an administrator, the Nondiscrimination Coordinator, Title IX Coordinator, and/or a Complaint Manager.

An employee may also report claims using Board policy 2:260, *Uniform Grievance Procedure*. If a claim is reported using Board policy 2:260, then the Complaint Manager shall process and review the claim according to that policy, in addition to any response required by this policy.

The Superintendent shall insert into this policy the names, office addresses, email addresses, and telephone numbers of the District's current Nondiscrimination Coordinator, Title IX Coordinator, and Complaint Managers.

Nondiscrimination Coordinator:

Title IX Coordinator:

~~Merryl Brownlow~~

~~Merryl Brownlow~~

Jason Smit

Jason Smit

12809 S. McVickers Avenue
Palos Heights, IL 60463

12809 S. McVickers Avenue
Palos Heights, IL 60463

~~mbrownlow@palos128.org~~

jsmit@palos128.org

708-597-9040

~~mbrownlow@palos128.org~~

jsmit@palos128.org

708-597-9040

Complaint Managers:

~~Merryl Brownlow~~

Mary Kate Moroney

12809 S. McVickers Avenue
Palos Heights, IL 60463

mmoroney@palos128.org

~~mbrownlow@palos128.org~~

708-597-9040

Jason Smit

12809 S. McVickers Avenue
Palos Heights, IL 60463

jsmit@palos128.org

708-597-9040

Investigation Process

Any District employee who receives a report or complaint of harassment must promptly forward the report or complaint to the Nondiscrimination Coordinator, Title IX Coordinator, or a Complaint Manager. Any employee who fails to promptly forward a report or complaint may be disciplined, up to and including discharge.

Reports and complaints of harassment will be confidential to the greatest extent practicable, subject to the District's duty to investigate and maintain a workplace environment that is productive, respectful, and free of unlawful discrimination, including harassment.

For any report or complaint alleging sexual harassment that, if true, would implicate Title IX of the Education Amendments of 1972 ([20 U.S.C. §1681 et seq.](#)), the Title IX Coordinator or designee shall consider whether action under Board policy 2:265, *Title IX Grievance Procedure*, should be initiated.

For any report or complaint alleging harassment on the basis of race, color, or national origin, the Nondiscrimination Coordinator or a Complaint Manager or designee shall investigate under Board policy 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*.

For any other alleged workplace harassment that does not require action under Board policies 2:265, *Title IX Grievance Procedure*, or 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*, the Nondiscrimination Coordinator or a Complaint Manager or designee shall consider whether an investigation under Board policy 2:260, *Uniform Grievance Procedure*, and/or 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*, should be initiated, regardless of whether a written report or complaint is filed.

Reports That Involve Alleged Incidents of Sexual Abuse of a Child by School Personnel

An *alleged incident of sexual abuse* is an incident of sexual abuse of a child, as defined in [720 ILCS 5/11-9.1A\(b\)](#), that is alleged to have been perpetrated by school personnel, including a school vendor or volunteer, that occurred: on school grounds during a school activity; or outside of school grounds or not during a school activity.

Any complaint alleging an incident of sexual abuse shall be processed and reviewed according to Board policy 5:90, *Abused and Neglected Child Reporting*. In addition to reporting the suspected abuse, the complaint shall also be processed under Board policy 2:265, *Title IX Grievance Procedure*, or Board policy 2:260, *Uniform Grievance Procedure*.

Enforcement

A violation of this policy by an employee may result in discipline, up to and including discharge. A violation of this policy by a third party will be addressed in accordance with the authority of the Board in the context of the relationship of the third party to the District, e.g., vendor, parent/guardian, invitee, etc. Any person making a knowingly false accusation regarding harassment will likewise be subject to disciplinary action, which for an employee may be up to and including discharge.

Retaliation Prohibited

An employee's employment, compensation, or work assignment shall not be adversely affected by complaining or providing information about harassment. Retaliation against employees for bringing complaints or providing information about harassment is prohibited (see Board policies 2:260, *Uniform Grievance Procedure*, 2:265, *Title IX Grievance Procedure*, and 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*), and depending upon the law governing the complaint,

whistleblower protection may be available under the State Officials and Employees Ethics Act ([5 ILCS 430/](#)), the Whistleblower Act ([740 ILCS 174/](#)), and/or the Ill. Human Rights Act ([775 ILCS 5/](#)).

An employee should report allegations of retaliation to his/her immediate supervisor, the Building Principal, an administrator, the Nondiscrimination Coordinator, and/or a Complaint Manager.

Employees who retaliate against others for reporting or complaining of violations of this policy or for participating in the reporting or complaint process will be subject to disciplinary action, up to and including discharge.

Recourse to State and Federal Fair Employment Practice Agencies

The District encourages all employees who have information regarding violations of this policy to report the information pursuant to this policy. The following government agencies are available to assist employees: the Ill. Dept. of Human Rights and the U.S. Equal Employment Opportunity Commission.

The Superintendent shall also use reasonable measures to inform staff members, applicants, and nonemployees of this policy, which shall include posting on the District website and/or making this policy available in the District's administrative office, and including this policy in the appropriate handbooks.

LEGAL REF.:

[42 U.S.C. §2000e](#) *et seq.*, Title VII of the Civil Rights Act of 1964; [29 C.F.R. §1604.11](#).

[20 U.S.C. §1681](#) *et seq.*, Title IX of the Education Amendments of 1972; [34 C.F.R. Part 106](#).

[5 ILCS 430/70-5](#)(a), State Officials and Employees Ethics Act.

[775 ILCS 5/2-101](#)(E) and (E-1), [5/2-102](#)(A), (A-10), (D-5), [5/2-102](#)(E-5), [5/2-109](#), [5/5-102](#), and [5/5-102.2](#), Ill. Human Rights Act.

[56 Ill. Admin.Code Parts 2500](#), [2510](#), [5210](#), and [5220](#).

[Vance v. Ball State Univ.](#), 570 U.S. 421 (2013).

[Crawford v. Metro. Gov't of Nashville & Davidson Cnty.](#), 555 U.S. 271 (2009).

[Jackson v. Birmingham Bd. of Educ.](#), 544 U.S. 167 (2005).

Oncale v. Sundowner Offshore Servs., 523 U.S. 75 (1998).

Burlington Indus. v. Ellerth, 524 U.S. 742 (1998).

Faragher v. City of Boca Raton, 524 U.S. 775 (1998).

Harris v. Forklift Systems, 510 U.S. 17 (1993).

Franklin v. Gwinnett Co. Public Schools, 503 U.S. 60 (1992).

Meritor Savings Bank v. Vinson, 477 U.S. 57 (1986).

Porter v. Erie Foods Int, Inc., 576 F.3d 629 (7th Cir. 2009).

Williams v. Waste Mgmt., 361 F.3d 1021 (7th Cir. 2004).

Berry v. Delta Airlines, 260 F.3d 803 (7th Cir. 2001).

Sangamon Cnty. Sheriff's Dept. v. Ill. Human Rights Com'n, 233 Ill.2d 125 (Ill. 2009).

CROSS REF.: 2:260 (Uniform Grievance Procedure), 2:265 (Title IX Grievance Procedure), 2:270 (Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited), 4:60 (Purchases and Contracts), 5:10 (Equal Employment Opportunity and Minority Recruitment), 5:90 (Abused and Neglected Child Reporting), 5:120 (Employee Ethics; Code of Professional Conduct; and Conflict of Interest), 7:20 (Harassment of Students Prohibited), 8:30 (Visitors to and Conduct on School Property)

ADOPTED: August 13, 2025

Palos Heights SD 128

General Personnel

5:10 Equal Employment Opportunity and Minority Recruitment

The School District shall provide equal employment opportunities to all persons regardless of their race; color; creed; religion; national origin; sex; sexual orientation; age; ancestry; marital status; arrest record; military status; order of protection status; unfavorable military discharge; citizenship status provided the individual is authorized to work in the United States; work authorization status; use of lawful products while not at work; being a victim of domestic violence, sexual violence, gender violence, or any other crime of violence or use of District-issued equipment to record such types of violence; genetic information; physical or mental handicap or disability, if otherwise able to perform the essential functions of the job with reasonable accommodation; pregnancy, childbirth, or related medical conditions; reproductive health decisions; credit history, unless a satisfactory credit history is an established bona fide occupational requirement of a particular position; conviction record, unless authorized by law; family responsibilities; or other legally protected categories. No one will be penalized solely for one's status as a registered qualifying patient or a registered designated caregiver for purposes of the Compassionate Use of Medical Cannabis Program Act, [410 ILCS 130/](#).

Persons who believe they have not received equal employment opportunities should report their claims to the Nondiscrimination Coordinator and/or a Complaint Manager under Board policy 2:260, *Uniform Grievance Procedure*, or in the case of denial of equal employment opportunities on the basis of race, color, or national origin, Board policy 2:270, *Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited*. These individuals are listed below. No employee or applicant will be discriminated or retaliated against because one: (1) requested, attempted to request, used, or attempted to use a reasonable accommodation as allowed by the Illinois Human Rights Act, or (2) initiated a complaint, was a witness, supplied information, or otherwise participated in an investigation or proceeding involving an alleged violation of this policy or State or federal laws, rules or regulations, provided the employee or applicant did not make a knowingly false accusation nor provide knowingly false information.

Administrative Implementation

The Superintendent shall appoint a Nondiscrimination Coordinator for personnel who shall be responsible for coordinating the District's nondiscrimination efforts. The Nondiscrimination Coordinator may be the Superintendent or a Complaint Manager under Board policy 2:260, *Uniform Grievance Procedure*.

The Superintendent shall appoint a Title IX Coordinator to coordinate the District's efforts to comply with Title IX.

The Superintendent shall insert into this policy the names, office addresses, email addresses, and telephone numbers of the District's current Nondiscrimination Coordinator, Title IX Coordinator, and Complaint Managers.

Nondiscrimination Coordinator:

Jason Smit

~~Merryl Brownlow~~

12809 S. McVickers Avenue

Palos Heights, IL 60463

jsmit@palos128.org

~~mbrownlow@palos128.org~~

708-597-9040

Title IX Coordinator:

Jason Smit

~~Merryl Brownlow~~

12809 S. McVickers Avenue

Palos Heights, IL 60463

jsmit@palos128.org

~~mbrownlow@palos128.org~~

708-597-9040

Complaint Managers:

~~Merryl Brownlow~~

Mary Kate Moroney

12809 S. McVickers Avenue

Palos Heights, IL 60463

mmoroney@palos128.org

~~mbrownlow@palos128.org~~

Jason Smit

12809 S. McVickers Avenue

Palos Heights, IL 60463

jsmit@palos128.org

The Superintendent shall also use reasonable measures to inform staff members and applicants that the District is an equal opportunity employer, such as, by posting required notices and including this policy in the appropriate handbooks.

Minority Recruitment

The District will attempt to recruit and hire minority employees. The implementation of this policy may include advertising openings in minority publications, participating in minority job fairs, and recruiting at colleges and universities with significant minority enrollments. This policy, however, does not require or permit the District to give preferential treatment or special rights based on a protected status without evidence of past discrimination.

LEGAL REF.:

[8 U.S.C. §1324a](#) *et seq.*, Immigration Reform and Control Act.

[20 U.S.C. §1681](#) *et seq.*, Title IX of the Education Amendments of 1972; [34 C.F.R. Part 106](#).

[29 U.S.C. §206](#)(d), Equal Pay Act.

[29 U.S.C. §218d](#), Fair Labor Standards Act.

[29 U.S.C. §621](#) *et seq.*, Age Discrimination in Employment Act.

[29 U.S.C. §701](#) *et seq.*, Rehabilitation Act of 1973.

[38 U.S.C. §4301](#) *et seq.*, Uniformed Services Employment and Reemployment Rights Act (1994).

[42 U.S.C. §1981](#) *et seq.*, Civil Rights Act of 1991.

[42 U.S.C. §2000d](#) *et seq.*, Title VI of the Civil Rights Act of 1964; [34 C.F.R. Part 100](#).

[42 U.S.C. §2000e](#) *et seq.*, Title VII of the Civil Rights Act of 1964; [29 C.F.R. Part 1601](#).

[42 U.S.C. §2000ff](#) *et seq.*, Genetic Information Nondiscrimination Act of 2008.

[42 U.S.C. §2000gg](#) *et seq.*, Pregnant Workers Fairness Act; [29 C.F.R. Part 1636](#).

[42 U.S.C. §2000e\(k\)](#), Pregnancy Discrimination Act.

[42 U.S.C. §12111](#) *et seq.*, Americans with Disabilities Act, Title I.

[Ill. Constitution, Art. I](#), §§17, 18, and 19.

[105 ILCS 5/10-20.7](#), [5/10-20.7a](#), [5/10-21.1](#), [5/10-22.4](#), [5/10-23.5](#), [5/22-19](#), [5/24-4](#), [5/24-4.1](#), and [5/24-7](#).

[410 ILCS 130/40](#), Compassionate Use of Medical Cannabis Program Act.

[410 ILCS 513/25](#), Genetic Information Privacy Act.

[740 ILCS 174/](#), Ill. Whistleblower Act.

[775 ILCS 5/1-103](#), [5/2-101](#), [5/2-102](#), [5/2-103](#), [5/2-103.1](#), [5/2-104\(D\)](#) and [5/6-101](#), Ill. Human Rights Act.

[775 ILCS 35/](#), Religious Freedom Restoration Act.

[820 ILCS 55/10](#), Right to Privacy in the Workplace Act.

[820 ILCS 70/](#), Employee Credit Privacy Act.

[820 ILCS 75/](#), Job Opportunities for Qualified Applicants Act.

[820 ILCS 112/](#), Ill. Equal Pay Act of 2003.

[820 ILCS 180/30](#) and [180/33](#), Victims' Economic Security and Safety Act.

[820 ILCS 260/](#), Nursing Mothers in the Workplace Act.

CROSS REF.: [2:260](#) (Uniform Grievance Procedure), [2:265](#) (Title IX Grievance Procedure), [2:270](#) (Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited), [5:20](#) (Workplace Harassment Prohibited), [5:30](#) (Hiring Process and Criteria), [5:40](#) (Communicable and Chronic Infectious Disease), [5:50](#) (Drug- and Alcohol-Free Workplace; E-Cigarette, Tobacco, and Cannabis Prohibition), [5:70](#) (Religious Holidays), [5:180](#) (Temporary Illness or Temporary Incapacity), [5:200](#) (Terms and Conditions of Employment and Dismissal), [5:250](#) (Leaves of Absence), [5:270](#) (Employment At-Will, Compensation, and Assignment), [5:300](#) (Schedules and Employment Year), [5:330](#) (Sick Days, Vacation, Holidays, and Leaves), [7:10](#) (Equal Educational Opportunities), [7:180](#) (Prevention of and Response to Bullying, Intimidation, and Harassment), [8:70](#) (Accommodating Individuals with Disabilities)

ADOPTED: January 21, 2026

Palos Heights SD 128

SECTION 2 - BOARD OF EDUCATION

2:265 Title IX Grievance Procedure

Sexual harassment affects a student's ability to learn and an employee's ability to work. Providing an educational and workplace environment free from sexual harassment is an important District goal. The District does not discriminate on the basis of sex in any of its education programs or activities, and it complies with Title IX of the Education Amendments of 1972 (Title IX) and its implementing regulations ([34 C.F.R. Part 106](#)) concerning everyone in the District's education programs and activities, including applicants for employment, students, parents/guardians, employees, and third parties.

Title IX Sexual Harassment Prohibited

Sexual harassment as defined in Title IX (Title IX Sexual Harassment) is prohibited. Any person, including a District employee or agent, or student, engages in Title IX Sexual Harassment when that person engages in conduct on the basis of an individual's sex that satisfies one or more of the following:

1. A District employee conditions the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct; or
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the District's educational program or activity; or
3. *Sexual assault* as defined in [20 U.S.C. §1092\(f\)\(6\)\(A\)\(v\)](#), *dating violence* as defined in [34 U.S.C. §12291\(a\)\(11\)](#), *domestic violence* as defined in [34 U.S.C. §12291\(a\)\(12\)](#), or *stalking* as defined in [34 U.S.C. §12291\(a\)\(36\)](#).

Examples of sexual harassment include, but are not limited to, touching, rape, sexual battery, sexual abuse, sexual coercion, crude jokes or pictures, discussions of sexual experiences, teasing related to sexual characteristics, and spreading rumors related to a person's alleged sexual activities.

Definitions from [34 C.F.R. §106.30](#)

Complainant means an individual who is alleged to be the victim of conduct that could constitute sexual harassment.

Education program or activity includes locations, events, or circumstances where the District has substantial control over both the *Respondent* and the context in which alleged sexual harassment occurs.

Formal Title IX Sexual Harassment Complaint means a document filed by a *Complainant* or signed by the Title IX Coordinator alleging sexual harassment against a *Respondent* and requesting that the District investigate the allegation.

Respondent means an individual who has been reported to be the perpetrator of the conduct that could constitute sexual harassment.

Supportive measures mean non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the *Complainant* or the *Respondent* before or after the filing of a Formal Title IX Sexual Harassment Complaint or where no Formal Title IX Sexual Harassment Complaint has been filed.

Title IX Sexual Harassment Prevention and Response

The Superintendent or designee will ensure that the District prevents and responds to allegations of Title IX Sexual Harassment as follows:

1. Ensures that the District's comprehensive health education program in Board policy 6:60, *Curriculum Content*, incorporates (a) age-appropriate sexual abuse and assault awareness and prevention programs in grades pre-K through 12, and (b) age-appropriate education about the warning signs, recognition, dangers, and prevention of teen dating violence in grades 7-12. This includes incorporating student social and emotional development into the District's educational program as required by State law and in alignment with Board policy 6:65, *Student Social and Emotional Development*.
2. Incorporates education and training for school staff as recommended by the Superintendent, Title IX Coordinator, Nondiscrimination Coordinator, Building Principal, Assistant Building Principal, Dean of Students, or a Complaint Manager.
3. Notifies applicants for employment, students, parents/guardians, employees, and collective bargaining units of this policy and contact information for the Title IX Coordinator by, at a minimum, prominently displaying them on the District's website, if any, and in each handbook made available to such persons.

Making a Report

A person who wishes to make a report under this Title IX grievance procedure may make a report to the Title IX Coordinator, Nondiscrimination Coordinator, Building Principal, Assistant Building Principal, Dean of Students, a Complaint Manager, or any employee with whom the person is comfortable speaking.

School employees shall respond to incidents of sexual harassment by promptly making or forwarding the report to the Title IX Coordinator. An employee who fails to promptly make or

forward a report may be disciplined, up to and including discharge.

The Superintendent shall insert into this policy and keep current the name, office address, email address, and telephone number of the Title IX Coordinator.

Title IX Coordinator:

Jason Smit
~~Merryl Brownlow~~

12809 S. McVickers Avenue
Palos Heights, IL 60463

jsmit@palos128.org
~~mbrownlow@palos128.org~~

708-597-9040

Processing and Reviewing a Report

Upon receipt of a report made under this Title IX grievance procedure, the Title IX Coordinator and/or designee will promptly contact the Complainant to: (1) discuss the availability of supportive measures, (2) consider the *Complainant's* wishes with respect to *supportive measures*, (3) inform the Complainant of the availability of supportive measures with or without the filing of a Formal Title IX Sexual Harassment Complaint, and (4) explain to the Complainant the process for filing a Formal Title IX Sexual Harassment Complaint.

Further, the Title IX Coordinator will analyze the report to identify and determine whether there is another or an additional appropriate method(s) for processing and reviewing it. For any report received, the Title IX Coordinator shall review Board policies 2:260, *Uniform Grievance Procedure*; 5:20, *Workplace Harassment Prohibited*; 5:90, *Abused and Neglected Child Reporting*; 5:120, *Employee Ethics; Code of Professional Conduct; and Conflict of Interest*; 7:20, *Harassment of Students Prohibited*; 7:180, *Prevention of and Response to Bullying, Intimidation, and Harassment*; 7:185, *Teen Dating Violence Prohibited*; and 7:190, *Student Behavior*, to determine if the allegations in the report require further action.

Reports of alleged sexual harassment will be confidential to the greatest extent practicable, subject to the District's duty to investigate and maintain an educational program or activity that is productive, respectful, and free of sexual harassment.

Formal Title IX Sexual Harassment Complaint Grievance Process

When a Formal Title IX Sexual Harassment Complaint is filed, the Title IX Coordinator will investigate it or appoint a qualified person to undertake the investigation.

The Superintendent or designee shall implement procedures to ensure that all Formal Title IX Sexual Harassment Complaints are processed and reviewed according to a Title IX grievance process that fully complies with [34 C.F.R. §106.45](#). The District's grievance process shall, at a minimum:

1. Treat *Complainants* and *Respondents* equitably by providing remedies to a *Complainant* where the *Respondent* is determined to be responsible for sexual harassment, and by following a grievance process that complies with [34 C.F.R. §106.45](#) before the imposition of any disciplinary sanctions or other actions against a *Respondent*.
2. Require an objective evaluation of all relevant evidence – including both inculpatory and exculpatory evidence – and provide that credibility determinations may not be based on a person's status as a *Complainant*, *Respondent*, or witness.
3. Require that any individual designated by the District as a Title IX Coordinator, investigator, decision-maker, or any person designated by the District to facilitate an informal resolution process:
 - a. Not have a conflict of interest or bias for or against complainants or respondents generally or an individual *Complainant* or *Respondent*.
 - b. Receive training on the definition of sexual harassment, the scope of the District's education program or activity, how to conduct an investigation and grievance process (including hearings, appeals, and informal resolution processes, as applicable), and how to serve impartially.
4. Require that any individual designated by the District as an investigator receiving training on issues of relevance to create an investigative report that fairly summarizes relevant evidence.
5. Require that any individual designated by the District as a decision-maker receive training on issues of relevance of questions and evidence, including when questions and evidence about the *Complainant's* sexual predisposition or prior sexual behavior are not relevant.
6. Include a presumption that the *Respondent* is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.
7. Include reasonably prompt timeframes for conclusion of the grievance process.
8. Describe the range of possible disciplinary sanctions and remedies the District may

implement following any determination of responsibility.

9. Base all decisions upon the *preponderance of evidence* standard.
10. Include the procedures and permissible bases for the *Complainant* and *Respondent* to appeal.
11. Describe the range of *supportive measures* available to *Complainants* and *Respondents*.
12. Not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.

Enforcement

Any District employee who is determined, at the conclusion of the grievance process, to have engaged in sexual harassment will be subject to disciplinary action up to and including discharge. Any third party who is determined, at the conclusion of the grievance process, to have engaged in sexual harassment will be addressed in accordance with the authority of the Board in the context of the relationship of the third party to the District, e.g., vendor, parent, invitee, etc. Any District student who is determined, at the conclusion of the grievance process, to have engaged in sexual harassment will be subject to disciplinary action, including, but not limited to, suspension and expulsion consistent with student behavior policies. Any person making a knowingly false accusation regarding sexual harassment will likewise be subject to disciplinary action.

This policy does not increase or diminish the ability of the District or the parties to exercise any other rights under existing law.

Retaliation Prohibited

The District prohibits any form of retaliation against anyone who, in good faith, has made a report or complaint, assisted, or participated or refused to participate in any manner in a proceeding under this policy. Any person should report claims of retaliation using Board policy 2:260, *Uniform Grievance Procedure*.

Any person who retaliates against others for reporting or complaining of violations of this policy or for participating in any manner under this policy will be subject to disciplinary action, up to and including discharge, with regard to employees, or suspension and expulsion, with regard to students.

LEGAL REF.:

[20 U.S.C. §1681](#) *et seq.*, Title IX of the Educational Amendments of 1972; [34 C.F.R. Part 106](#).

Davis v. Monroe County Bd. of Educ., 526 U.S. 629 (1999).

Gebser v. Lago Vista Independent Sch. Dist., 524 U.S. 274 (1998).

CROSS REF.: 2:260 (Uniform Grievance Procedure), 5:10 (Equal Employment Opportunity and Minority Recruitment), 5:20 (Workplace Harassment Prohibited), 5:90 (Abused and Neglected Child Reporting), 5:100 (Staff Development Program), 5:120 (Employee Ethics; Code of Professional Conduct; and Conflict of Interest), 6:60 (Curriculum Content), 6:65 (Student Social and Emotional Development), 7:10 (Equal Educational Opportunities), 7:20 (Harassment of Students Prohibited), 7:180 (Prevention of and Response to Bullying, Intimidation, and Harassment), 7:185 (Teen Dating Violence Prohibited), 7:190 (Student Behavior), 7:255 (Students Who are Parents, Expectant Parents, or Victims of Domestic or Sexual Violence)

ADOPTED: August 13, 2025

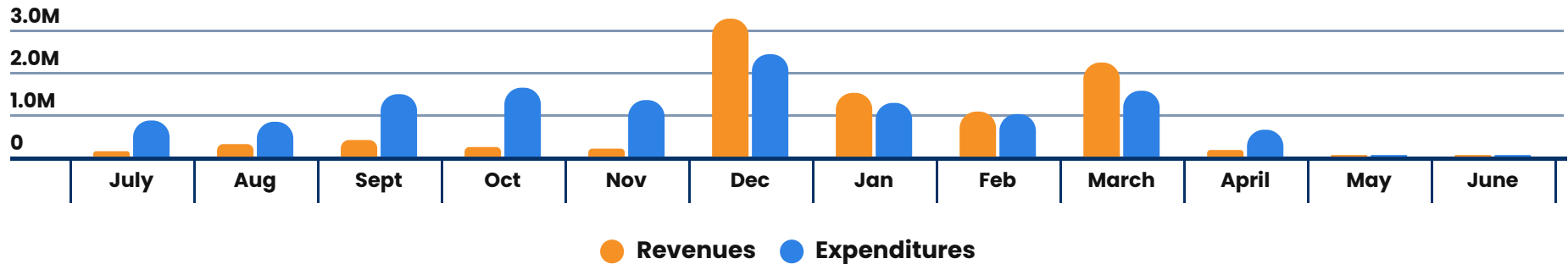
Palos Heights SD 128

Monthly Financial Report – April 2026

Palos Heights School District 128



Monthly Revenues and Expenditures for FY26



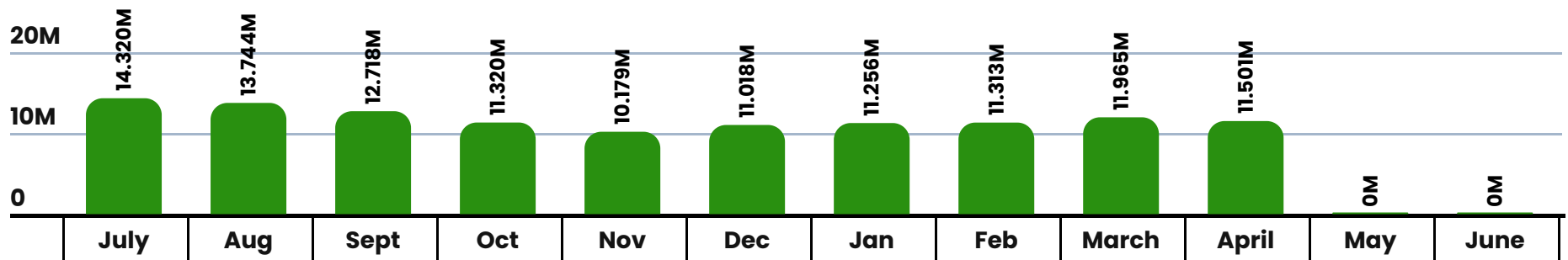
Revenues Received During Month

Source	Month	YTD
Real Estate Taxes	0	7,263,000
Other Local Sources	13,000	286,000
Evidenced-Based Funding	58,000	518,000
Other State Sources	85,000	911,000
Federal Sources	2,000	427,000
Total All Funds	\$158,000	\$9,405,000

Expenses Paid During Month

Object	Month	YTD
Salaries	346,000	6,386,000
Benefits	88,000	1,672,000
Purchased Services	118,000	1,702,000
Supplies & Materials	55,000	507,000
Capital Outlays	10,000	889,000
Tuition and Other	16,000	470,000
Debt Payments	0	1,321,000
Total All Funds	\$633,000	\$12,947,000

Monthly Fund Balance – All Funds



Budget Tracking Report



FY26 Actual YTD

Beginning Balance	YTD Revenues	YTD Expenditures	Bond Proceeds - YTD	Ending Balance
\$15,043,000	\$9,405,000	\$12,947,000		\$11,501,000

FY26 Total Budget

Beginning Balance	Budgeted Revenues	Budgeted Expenditures	Budgeted Bond Proceeds	Budgeted Ending Balance
\$15,043,000	\$14,278,000	\$17,142,000		\$12,179,000

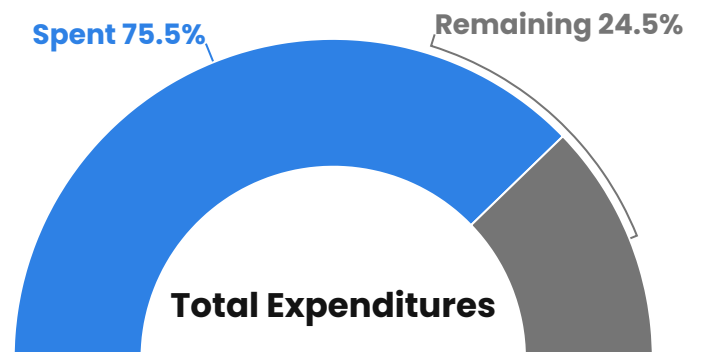
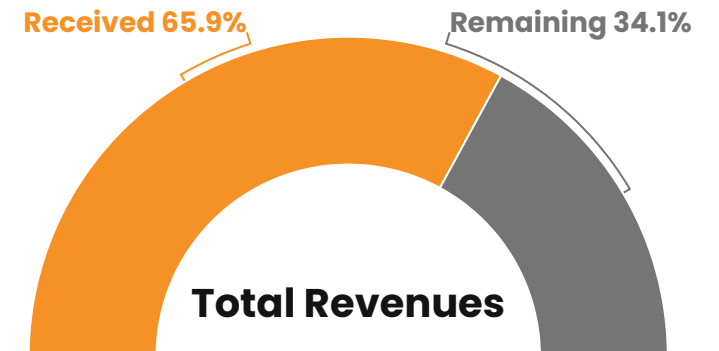
Revenues Received – Actual YTD vs. Total FY Budget

Source	YTD	Budget	% of Budget	Budget Remaining
Real Estate Taxes	7,263,000	11,276,000	64.41%	4,013,000
Other Local Sources	286,000	695,000	41.15%	409,000
Evidenced-Based Funding	518,000	620,000	83.55%	102,000
Other State Sources	911,000	1,205,000	75.60%	294,000
Federal Sources	427,000	482,000	88.59%	55,000
Total All Funds	\$9,405,000	\$14,278,000	65.87%	\$4,873,000

Expenses Paid – Actual YTD vs. Total FY Budget

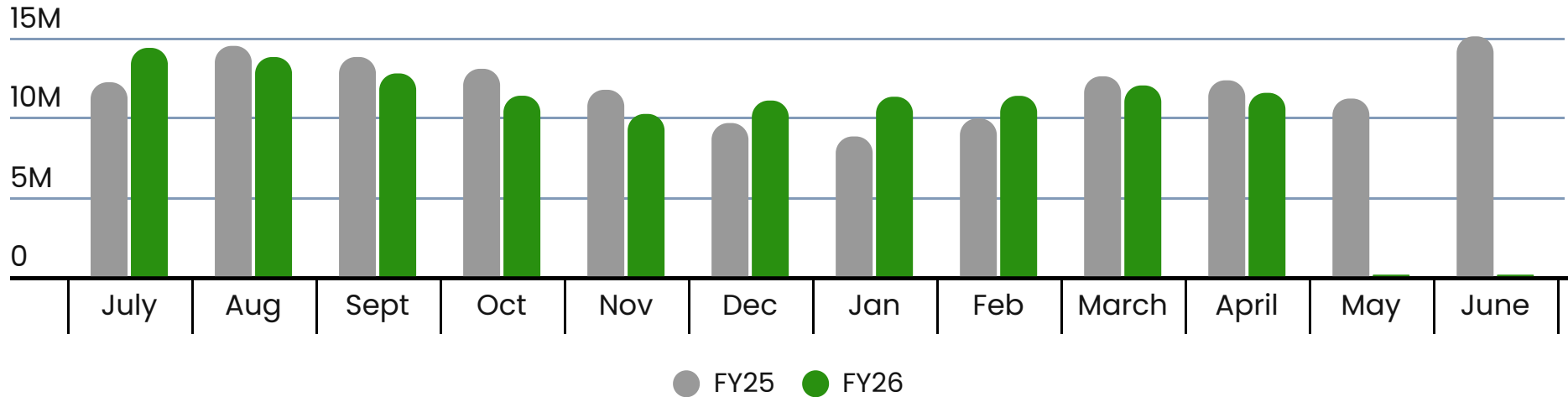
Source	YTD	Budget	% of Budget	Budget Remaining
Salaries	6,386,000	8,842,000	72.22%	2,456,000
Benefits	1,672,000	2,245,000	74.48%	573,000
Purchased Services	1,702,000	1,732,000	98.27%	30,000
Supplies	507,000	702,000	72.22%	195,000
Capital Outlays	889,000	1,484,000	59.91%	595,000
Tuition and Other	470,000	629,000	74.72%	159,000
Debt Service	1,321,000	1,508,000	87.60%	187,000
Total All Funds	\$12,947,000	\$17,142,000	75.53%	\$4,195,000

% Actual vs. Budget



Current Year vs. Prior Year Tracking Report

Monthly Fund Balance Comparison



YTD Revenues FY26 vs. FY25

Source	Current YTD	FY25 YTD	FY26 v. FY25
Real Estate Taxes	7,263,000	10,814,000	(3,551,000)
Other Local Sources	286,000	359,000	(73,000)
Evidenced-Based Funding	518,000	506,000	12,000
Other State Sources	911,000	1,100,000	(189,000)
Federal Sources	427,000	571,000	(144,000)
Total All Funds	\$9,405,000	\$13,350,000	\$(3,945,000)

YTD Expenditures FY26 vs. FY25

Object	Current YTD	FY25 YTD	FY26 v. FY25
Salaries	6,386,000	5,777,000	609,000
Benefits	1,672,000	1,488,000	184,000
Purchased Services	1,702,000	1,280,000	422,000
Supplies	507,000	502,000	5,000
Capital Outlays	889,000	293,000	596,000
Tuition and Other	470,000	520,000	(50,000)
Debt Payments	1,321,000	1,159,000	162,000
Total All Funds	\$12,947,000	\$11,019,000	\$1,928,000

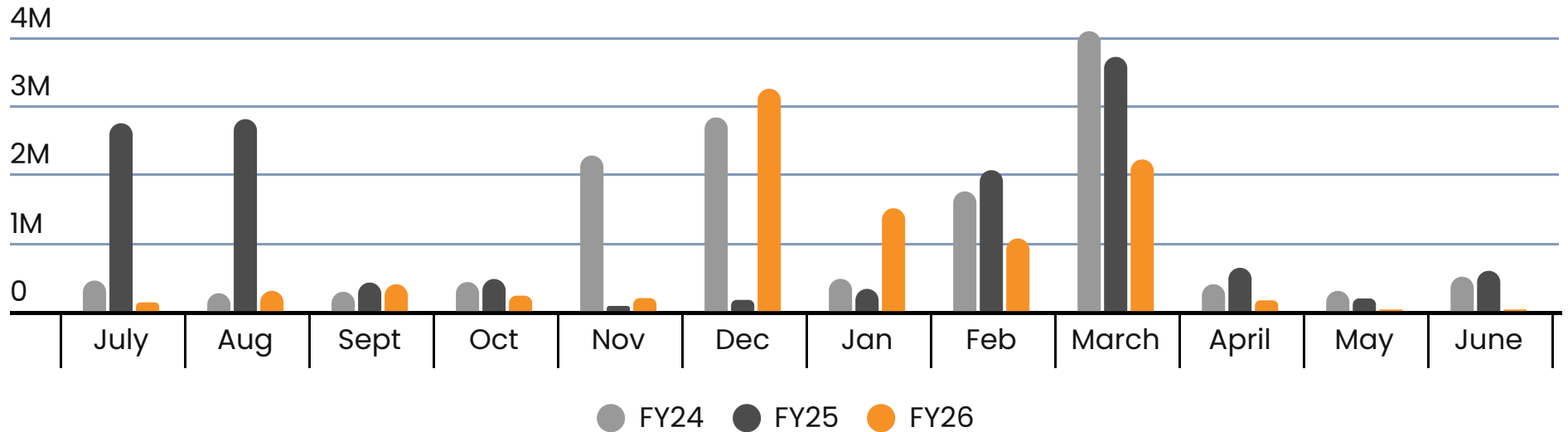
Current YTD Revenues vs. Expenditures
\$(3,542,000)

Prior YTD Revenues vs. Expenditures
\$2,331,000

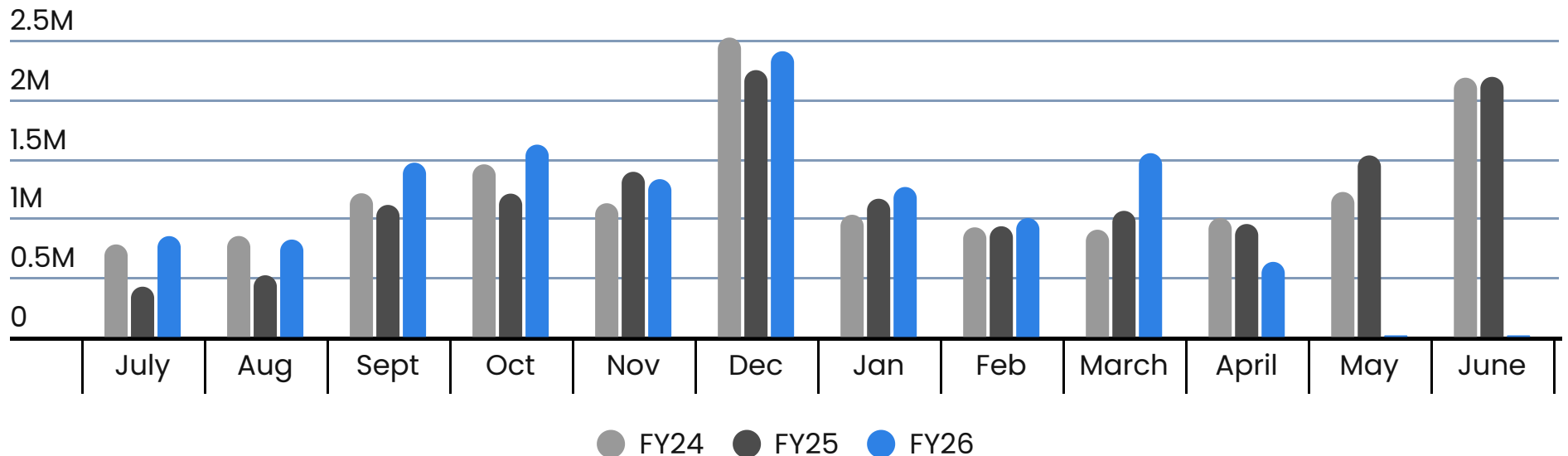
Cash Flow Report



Revenues Received by Month vs. Prior Years



Expenditures Paid by Month vs. Prior Years



Fund Balance Report



Fund	Beginning Balance	Revenues YTD	Expenses YTD	Transfers - Other	Ending Balance
Education	4,417,000	7,057,000	8,770,000		2,704,000
Operations and Maintenance	380,000	691,000	949,000		122,000
Transportation	620,000	403,000	544,000		479,000
Working Cash	2,803,000	107,000	0		2,910,000
Total - Operating Funds	\$8,220,000	\$8,258,000	\$10,263,000		\$6,215,000
Bond and Interest	844,000	833,000	1,321,000		356,000
IMRF/Social Security	223,000	302,000	344,000		181,000
Capital Projects	5,751,000	12,000	1,019,000		4,744,000
Tort Immunity	5,000	0	0		5,000
Health/Life Safety	0	0	0		0
Total - Other Funds	\$6,823,000	\$1,147,000	\$2,684,000		\$5,286,000
Total - All Funds	\$15,043,000	\$9,405,000	\$12,947,000		\$11,501,000



Palos Heights School District 128

12809 S. McVicker Ave • Palos Heights, IL 60463
Phone: (708) 597-9040 • Fax: (708) 597 9089 • www.palos128.org

Merryl B. Brownlow, Ed.D.
Superintendent

February 9, 2026

Michael F. Henry
michaelfhenry@live.com

Dear Mr. Henry:

This correspondence is in response to your Freedom of Information Act request received by the School District on April 13, 2026. You requested the following records pursuant to the Illinois Freedom of Information Act (5 ILCS 140):

1. The name of all law firm(s) currently providing legal services to the district and if changed in the last 8 years give the same info for the previous law firms or firm

Response: District 128 maintains agreements with two law firms referenced by the letters of agreement attached.

2. Any current engagement agreement(s), contract(s), or fee schedule(s) with legal counsel for the last 3 fiscal years

Response: See attached.

3. The total amount paid to each law firm for legal services for the LAST 3 Fiscal Years

Response: See attached.

In the event you feel your request has been denied by a District Freedom of Information Officer, you may appeal this decision to the Illinois Attorney General -Public Access Counselor, 500 S. 2nd Street, Springfield, Illinois 62701, (877) 299-3642 [public.access@ilag.gov]. You may also appeal this decision by filing suit for injunctive relief in the circuit court.

Sincerely,

A handwritten signature in cursive script that reads "Merryl B. Brownlow".

Merryl B. Brownlow, Ed.D.
District FOIA Officer



kriha boucek

2 TransAm Plaza Dr., Suite 450, Oakbrook Terrace, IL 60181
3 Club Centre Court, Suite D, Edwardsville, IL 62034
krihaboucek.com • 630.394.3790

June 16, 2020

Sara Boucek

Partner

Direct 630.394.3792
Cell 217.781.4877
sara@krihaboucek.com

Kevin Gordon

Partner

Direct 630.394.3784
Cell 708.522.6712
kevin@krihaboucek.com

Shane Jones

Partner

Direct 618.207.4820
Cell 314.303.3605
shane@krihaboucek.com

Stephanie Jones

Partner

Direct 630.394.3786
Cell 314.503.1299
stephanie@krihaboucek.com

Laura Knittle

Partner

Direct 630.394.3783
Cell 502.599.7530
laura@krihaboucek.com

Darcy Kriha

Partner

Direct 630.394.3782
Cell 708.921.3410
darcy@krihaboucek.com

Mohammed Lakhani

Partner

Direct 630.394.3785
Cell 630.362.8115
mohammed@krihaboucek.com

Rob Swain

Partner

Direct 630.394.3788
Cell 630.864.0278
rob@krihaboucek.com

Cassie Black

Associate

Direct 630.332.0469
Cell 312.848.0432
cassie@krihaboucek.com

Jennifer Sobocinski

Office Manager

Direct 630.394.3787
Cell 630.865.5928
jennifer@krihaboucek.com

Mr. William Grady, Board President
Dr. Merryl B. Brownlow, Superintendent
Palos Heights School District No. 128
12809 S. McVickers Avenue
Palos Heights, IL 60463

Re: Engagement Letter

Dear Mr. Grady and Dr. Brownlow:

Thank you for retaining Kriha Boucek, LLC to work with Palos Heights School District No.128. This letter will memorialize the details relating to the terms of our engagement and legal fees.

Our fees for legal services will be billed in 6-minute increments, as follows: \$275.00/hour for partners; \$250.00/hour for associates and \$125.00/hour for paralegals. These hourly rates may change from time to time, but only with advance written notice.

Fees for basic copying, telephone charges, postage, etc., will not be billed to the District. We consider these normal and customary business expenses that will be covered by the firm. Invoices will include significant expenses incurred beyond the normal course of our day-to-day work, e.g., court/administrative agency filing fees, hearing transcripts, computer research, printer copies (in excess of 500), expedited document delivery, etc. Our invoices will be detailed in nature and will be sent on a monthly basis. If at any time questions or concerns arise about the invoices or work performed, please contact me immediately. We will maintain and store records that are received from the District for five years after a matter has concluded, at which time the file will be destroyed unless instructed otherwise.

Additionally, at no additional charge, we will provide a legal update to the Board of Education each school year.

If these terms are acceptable, please sign a copy of this letter and return it to me at your earliest convenience. On behalf of the firm, you have my sincere thanks and gratitude.

Sincerely,

Sara Boucek

Stephanie Jones

The signatures below demonstrate that we have reviewed and agree with all of the terms contained in this Engagement Letter.

Mr. William Grady

Date

6/17/2020

Dr. Merryl B. Brownlow

Date

6/17/2020



kriha boucek

2 TransAm Plaza Dr., Suite 460, Oakbrook Terrace, IL 60181
3 Club Centre Court, Suite D, Edwardsville, IL 62034
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June 16, 2020

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Mr. William Grady, Board President
Dr. Merryl B. Brownlow, Superintendent
Palos Heights School District No. 128
12809 S. McVickers Avenue
Palos Heights, IL 60463

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Sincerely,

Sara Boucek

Stephanie Jones

The signatures below demonstrate that we have reviewed and agree with all of the terms contained in this Engagement Letter.

Mr. William Grady

Date

Dr. Merryl B. Brownlow

Date

February 2, 2018

Via Electronic & U.S. Mail

Ms. Kim Anoman
Business Manager
Palos Heights School District No. 128
12809 South McVicker
Palos Heights, IL 60463

Re: Recent Firm Name Change/Updating of PTAB Resolution

Dear Ms. Anoman:

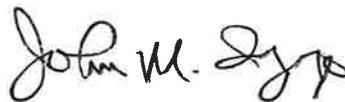
As you may have seen from our recent notice, the law firm of Hauser Izzo, LLC is now Hauser, Izzo, Petrarca, Gleason & Stillman, LLC. In conformity with the rules of the Illinois Property Tax Appeal Board, we would like to take this opportunity to update your resolution authorizing intervention in Property Tax Appeal Board matters to reflect our firm name change. We ask that you place approval of this updated resolution on the agenda for the next available meeting of the Board of Education.

If you have any questions, please let me know.

As always, we thank you for the opportunity to continue to serve the needs of Palos Heights School District No. 128 in these matters.

Very truly yours,

HAUSER, IZZO, PETRARCA,
GLEASON & STILLMAN, LLC



JOHN M. IZZO

JMI:rs
rs2f\ptab\cook\2016\ltr\FirmNameChangeSD128

**RESOLUTION AUTHORIZING INTERVENTION
IN PROPERTY TAX ASSESSMENT
PROCEEDINGS**

WHEREAS, an owner or owners of certain parcels of real property located within the corporate boundaries of Palos Heights School District No. 128, Cook County, Illinois, have filed or are anticipated to file appeals of the assessment of real property for tax years 2011 and succeeding years by the township assessor with the Cook County Board of Review or by the Board of Review of Cook County with the State of Illinois Property Tax Appeal Board ("PTAB") or the Cook County Circuit Court; and

WHEREAS, at least some of these appeals will seek changes in the assessed valuation of parcels in excess of \$100,000; and

WHEREAS, the Board of Education wishes to intervene in any tax assessment proceedings before the Board of Review, PTAB, or the Circuit Court for tax year 2011 and succeeding years for which the Board of Education received notice in order to protect its revenue interest in the assessed valuation of the subject parcels set by the township assessor or Board of Review of Cook County;

NOW, THEREFORE, BE IT RESOLVED, by the Board of Education of Palos Heights School District No. 128, Cook County, Illinois as follows:

Section 1: The Board hereby finds that all the recitals contained above are true and correct, and that the same are hereby incorporated herein by reference.

Section 2: The Board hereby authorizes the law firm of Hauser, Izzo, Petrarca, Gleason & Stillman, LLC, as its legal representative to: (1) file Requests to Intervene with the Cook County Board of Review, the PTAB, or the Circuit Court with respect to any appeal filed by any and all parties for tax year 2011 and succeeding years relative to any property located

within the corporate boundaries of the School District in Cook County, Illinois, for which a tax appeal is pending; (2) represent the Board's interests in that proceeding; and (3) execute any settlements or stipulations in such proceedings consistent with the Board's interests as authorized by the Administration.

Section 3: All motions and resolutions or parts thereof in conflict with the provisions of this Resolution are, to the extent of such conflict, hereby repealed.

Section 4: If any section, paragraph, clause or provision of this Resolution shall be held invalid, the invalidity of such section, paragraph, clause or provisions shall not affect any of the other sections, paragraphs, clauses or provisions of this Resolution.

Section 5: This Resolution shall be in full force and effect upon its adoption and shall remain in effect until action by this Board to modify or rescind it.

After a full and complete discussion thereof, Member Grady moved that the foregoing Resolution be adopted and Member Lynch seconded the motion. The President directed the Secretary to call the roll for a vote upon the motion to adopt this Resolution. Upon a roll call vote being taken, the Board of Education voted as follows:

AYES: Restivo, Louhy, Lynch, Lachowicz, Jacko, Lyons, Grady

NAYS: None

ABSTAIN: None

ABSENT: None

The President declared the motion carried and the Resolution duly adopted.

Dated: 2/14/18

By: [Signature]

ATTEST: Kathleen M Lachowicz
Secretary, Board of Education

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

CERTIFICATION

I, the undersigned, do hereby certify that I am the duly qualified and acting Secretary of the Board of Education, Palos Heights School District No. 128, Cook County, Illinois, and that as such official I am the keeper of the records and files of the Board.

I do further certify that the foregoing is a full, true and complete copy of a Resolution adopted by the Board of Education at a meeting of said Board held on the 14th day of February, 2018.

I do further certify that the deliberations of the Board on the adoption of said Resolution were conducted openly, that the vote on the adoption of said Resolution was conducted openly, that the vote on the adoption of said Resolution was taken openly, that said meeting was called and held in strict compliance with the provisions of the Open Meetings Act and of the School Code of the State of Illinois , as amended, and that the Board has complied with all of the provisions of said Act and said Code and with all of the procedural rules of the Board in conduct of said meeting.

IN WITNESS WHEREOF, I have hereunto affixed by official signature this 14th day of February, 2018.


Secretary, Board of Education

HAUSER IZZO, LLC

ATTORNEYS AT LAW

DANIEL M. BOYLE
Flossmoor Office
dboyle@hauserizzo.com

December 29, 2017

By Regular Mail

Dr. Dawn Green
Palos Heights School District No. 128
12809 South McVicker
Palos Heights, IL 60463

Re: Rate Modification

Dear Dr. Green:

We are writing to inform you that the firm will be making an adjustment to its hourly rate for attorneys for the first time in four (4) years. Effective February 1, 2018, the attorney rate will be modified from \$210.00 to \$220.00 per hour which will continue to be billed in one-tenth of an hour increments for all attorneys. Despite this modification, we will continue to offer the saving mechanisms that you have come to expect from our firm such as no database charges for online research and no reimbursement for mileage or travel expenses incurred on your behalf. We will continue our efforts to bring you the most cost-effective legal representation possible.

While we recognize that any spending, especially spending outside of your core educational mission, must be analyzed closely, we believe that this modest adjustment is necessary in order to attract and retain the high quality attorneys and staff necessary to provide you with the professional service levels that you have come to expect and deserve. In addition, despite this modification, our attorney billing rate still remains lower than most of our competitors who focus on the representation of public schools in the State of Illinois.

We value our partnership and look forward to continuing our relationship with you and the District. As always, we will continue to provide the District with high quality legal services and protect the interests of the Board of Education and all of its stakeholders in a professional and economical fashion. If either you or any members of your Board of Education have any questions or concerns regarding this modification, please contact us at your convenience.

Respectfully yours,

HAUSER IZZO, LLC



DANIEL M. BOYLE

SRAGA HAUSER, LLC

ATTORNEYS AT LAW

Alan T. Sraga • Teri E. Engler • John M. Izzo • Raymond A. Hauser
Daniel M. Boyle • Joel R. DeTella • Christopher L. Petrarca • William F. Gleason

DANIEL M. BOYLE
FLOSSMOOR OFFICE
dboyle@sragahauser.com

January 20, 2009

Dr. Kathleen M. Casey, Superintendent
Palos Heights School District No. 128
12809 South McVicker
Palos Heights, IL 60463

Re: Representation of Board of Education

Dear Dr. Casey:

Please accept our thanks, and convey our thanks to the Board of Education, for your decision to retain our firm as legal counsel for School District 128. We sincerely appreciate your confidence in us and the opportunity to serve the District. We look forward to productively and constructively working with you, as well as the Board, administration, and staff, if and when the need arises.

For the District's records, Sraga Hauser, LLC is a limited liability corporation. Our principal place of business and mailing address are set forth above. Our FEIN is 20-3044989.

We currently charge our public sector clients \$195.00 per hour for professional services, including but not limited to telephone inquiries, rendered by all of our attorneys. We bill all of our clients in increments of one-tenth of an hour and provide an itemized monthly invoice following the delivery of services. The invoice itemizes the date service is rendered, the specific service, and the time expended thereon. We believe that our rate is more than competitive when compared with the current rates of other attorneys practicing school law with the breadth and depth of our expertise in our practice areas.

We do not charge for customary secretarial or paraprofessional services. We do charge for attorney time during travel to and from a district, or on a district's behalf, to court, hearings, or other district-related meetings at our normal hourly rate. Costs incurred by our firm on behalf of our clients are passed along directly to the client (i.e., printing, messenger services, transcripts, filing fees, computer research), without markup for handling, and are itemized on the monthly invoices.

SRAGA HAUSER, LLC
ATTORNEYS AT LAW

Dr. Kathleen M. Casey
January 20, 2009
Page 2

We ask that our clients forward to us their school board meeting minutes and a copy of each agenda so that we may familiarize ourselves with routine matters affecting our clients and identify areas of potential concern. We review those minutes at no charge.

Again, we are pleased to provide legal services to the District, and we look forward to meeting with you and the members of the Board of Education, should you or the Board so desire, so that they may learn more about us and our firm. Feel free to contact me should there be any questions, or if additional information is needed.

Very truly yours,

SRAGA HAUSER, LLC



DANIEL M. BOYLE

DMB:mrs
F:\m7C\sd128co\ltr\Casey.7

Invoice	Inv. Date	Vendor	Total	Check Date	Clear Date
38164	04/09/2025	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$25.00	04/16/2025	04/24/2025
38040	03/21/2025	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$50.00	04/16/2025	04/24/2025
37748	02/10/2025	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$825.00	02/12/2025	02/19/2025
37461	01/17/2025	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$50.00	01/29/2025	02/04/2025
37284	12/18/2024	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$750.00	01/29/2025	02/04/2025
36530	09/30/2024	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$750.00	10/16/2024	10/22/2024
36224	09/09/2024	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$200.00	09/18/2024	09/25/2024

Total: \$2,650.00

Invoice	Inv. Date	Vendor	Total	Check Date	Clear Date
35936	06/21/2024	PETRARCA, GLEASON, BOYLE & IZZO,	\$450.00	06/28/2024	07/10/2024
35617	05/08/2024	PETRARCA, GLEASON, BOYLE & IZZO,	\$50.00	05/07/2024	05/22/2024
35330	05/03/2024	PETRARCA, GLEASON, BOYLE & IZZO,	\$175.00	05/07/2024	05/22/2024
35132	03/20/2024	PETRARCA, GLEASON, BOYLE & IZZO,	\$25.00	04/17/2024	04/23/2024
34329	12/05/2023	PETRARCA, GLEASON, BOYLE & IZZO,	\$1,125.00	12/13/2023	12/19/2023
33877	10/10/2023	PETRARCA, GLEASON, BOYLE & IZZO,	\$25.00	10/18/2023	10/24/2023
33731	09/07/2023	PETRARCA, GLEASON, BOYLE & IZZO,	\$250.00	09/20/2023	09/26/2023
33588	07/20/2023	PETRARCA, GLEASON, BOYLE & IZZO,	\$25.00	08/16/2023	08/25/2023
			Total: \$2,125.00		

Invoice	Inv. Date	Vendor	Total	Check Date	Clear Date
33289	06/22/2023	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$475.00	06/30/2023	07/06/2023
33030	05/25/2023	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$150.00	06/07/2023	06/13/2023
32829	04/28/2023	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$50.00	05/10/2023	05/16/2023
32602	03/20/2023	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$1,025.00	04/12/2023	04/18/2023
32370	02/28/2023	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$300.00	03/08/2023	03/15/2023
32111	01/13/2023	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$100.00	01/25/2023	01/31/2023
31275	09/30/2022	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$25.00	10/12/2022	10/18/2022
31158	08/22/2022	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$138.00	09/14/2022	09/21/2022
30830	07/28/2022	PETRARCA, GLEASON, BOYLE & IZZO, LLC	\$23.00	08/10/2022	08/16/2022

Total: \$2,286.00

Invoice	Inv. Date	Vendor	Total	Check Date	Clear Date
8721	06/11/2025	KRIHA BOUCEK LLC	\$1,793.00	06/27/2025	07/09/2025
8545	05/08/2025	KRIHA BOUCEK LLC	\$1,475.00	06/11/2025	06/17/2025
8378	04/07/2025	KRIHA BOUCEK LLC	\$1,829.00	04/16/2025	04/22/2025
8180	03/07/2025	KRIHA BOUCEK LLC	\$1,855.00	03/19/2025	03/26/2025
8000	02/10/2025	KRIHA BOUCEK LLC	\$5,634.50	02/12/2025	02/20/2025
7818	01/17/2025	KRIHA BOUCEK LLC	\$1,411.00	01/29/2025	02/05/2025
7702	12/18/2024	KRIHA BOUCEK LLC	\$1,357.00	01/29/2025	02/05/2025
7558	11/07/2024	KRIHA BOUCEK LLC	\$1,317.50	11/13/2024	11/19/2024
7415	10/29/2024	KRIHA BOUCEK LLC	\$678.50	11/13/2024	11/19/2024
7250	09/10/2024	KRIHA BOUCEK LLC	\$383.50	09/18/2024	09/24/2024
6915	07/10/2024	KRIHA BOUCEK LLC	\$1,261.00	07/17/2024	07/23/2024

Total: \$18,995.00

Invoice	Inv. Date	Vendor	Total	Check Date	Clear Date
6802	06/21/2024	KRIHA BOUCEK LLC	\$1,146.00	06/28/2024	07/10/2024
6674	05/29/2024	KRIHA BOUCEK LLC	\$1,180.50	06/04/2024	06/18/2024
6492	04/08/2024	KRIHA BOUCEK LLC	\$285.00	04/17/2024	04/23/2024
6336	03/19/2024	KRIHA BOUCEK LLC	\$950.00	04/17/2024	04/23/2024
6300	02/27/2024	KRIHA BOUCEK LLC	\$635.50	03/06/2024	03/12/2024
6115	01/11/2024	KRIHA BOUCEK LLC	\$912.00	01/24/2024	01/31/2024
5901	12/06/2023	KRIHA BOUCEK LLC	\$1,802.50	12/13/2023	12/19/2023
5740	11/03/2023	KRIHA BOUCEK LLC	\$1,367.00	11/15/2023	11/21/2023
5626	10/31/2023	KRIHA BOUCEK LLC	\$196.50	11/01/2023	11/10/2023
5529	09/13/2023	KRIHA BOUCEK LLC	\$3,228.00	09/20/2023	09/26/2023
5373	09/07/2023	KRIHA BOUCEK LLC	\$171.00	09/20/2023	09/26/2023

Total: \$11,874.00

Invoice	Inv. Date	Vendor	Total	Check Date	Clear Date
5179	06/26/2023	KRIHA BOUCEK LLC	\$2,195.00	06/30/2023	07/11/2023
5211	06/26/2023	KRIHA BOUCEK LLC	\$1,045.00	06/30/2023	07/11/2023
5039	05/25/2023	KRIHA BOUCEK LLC	\$1,567.50	06/07/2023	06/14/2023
4958	04/11/2023	KRIHA BOUCEK LLC	\$385.00	04/11/2023	04/21/2023
4808	03/20/2023	KRIHA BOUCEK LLC	\$742.50	04/12/2023	04/21/2023
4676	02/06/2023	KRIHA BOUCEK LLC	\$1,347.50	02/08/2023	02/21/2023
4537	01/13/2023	KRIHA BOUCEK LLC	\$247.50	01/25/2023	02/01/2023
4417	12/05/2022	KRIHA BOUCEK LLC	\$110.00	12/14/2022	12/28/2022
4304	11/09/2022	KRIHA BOUCEK LLC	\$137.50	11/17/2022	11/28/2022
9128	10/27/2022	KRIHA BOUCEK LLC	\$82.50	11/17/2022	11/28/2022
4038	09/30/2022	KRIHA BOUCEK LLC	\$375.00	10/12/2022	10/18/2022
3896	08/22/2022	KRIHA BOUCEK LLC	\$2,160.00	09/14/2022	09/22/2022
3793	07/28/2022	KRIHA BOUCEK LLC	\$247.50	08/10/2022	08/23/2022

Total: \$10,642.50

Invoice	Inv. Date	Vendor	Total	Check No.	Check Date	Clear Date
9890	02/06/2026	KRIHA BOUCEK LLC	\$2,243.50	45793	02/11/2026	03/06/2026
9734	12/12/2025	KRIHA BOUCEK LLC	\$3,765.50	45701	01/21/2026	03/06/2026
9421,9590	11/24/2025	KRIHA BOUCEK LLC	\$2,730.00	45540	12/10/2025	12/17/2025
9241	09/10/2025	KRIHA BOUCEK LLC	\$116.00	45206	09/17/2025	09/25/2025
9034	08/21/2025	KRIHA BOUCEK LLC	\$709.00	45206	09/17/2025	09/25/2025
8874	07/11/2025	KRIHA BOUCEK LLC	\$483.50	44992	07/16/2025	07/29/2025
			Total: \$10,047.50			

Invoice	Inv. Date	Vendor	Total	Status	Check No.	Check Date	Check Status	Clear Date
246231	03/25/2026	FAGEN FRIEDMAN & FU	\$2,830.00	On a Voucher	0			
245229	03/02/2026	FAGEN FRIEDMAN & FU	\$1,740.50	Posted to G/L	45872	03/18/2026	Printed	03/31/2026
			Total: \$4,570.50					

SCHOOL DISTRICT #128
12809 SOUTH McVICKER • PALOS HEIGHTS, IL 60463

70-1558/719
VOID AFTER 90 DAYS

040072

DISTRICT CHECK NO. VOUCHER NO. DATE

Palos Heights School District 128

40072

1162

03/09/2022

NET AMOUNT

EXPENSE

\$*****176.11

One Hundred Seventy Six and 11/100 Dollars

AMERICAN TIME & SIGNAL, COMPANY
P O BOX 707
DASSEL, MN 553250707

PAY
TO
THE
ORDER
OF

James J. Bell

⑈040072⑈ ⑆071915580⑆ 04⑈297⑈761⑈9⑈

PALOS HEIGHTS
SCHOOL DISTRICT #128
12809 SOUTH McVICKER • PALOS HEIGHTS, IL 60463

548	AMERICAN TIME & SIGNAL, COMPANY	1162	03/09/2022	40072
Vendor Number	Vendor Name	Voucher	Date	Check Number

PO Number	Invoice	Amount
0	854278	176.11

TOTAL:

\$176.11

AMERICAN TIME140 3RD ST
PO BOX 707DASSEL MN 55325-0707
USAamerican  time®

Invoice: 854278

Invoice Date: 2/21/2022

Customer ID: ILPH07

Order: 946861

Sales (800) 328-8996

Fax (320) 275-2603

Billing (877) 666-1207

INVOICE

Page: 1 of 1

Bill To:PALOS HEIGHTS SCHOOL DISTRICT 128
12809 S MCVICKER
PALOS HEIGHTS IL 60463 USA**Ship To:**DAVE ADAMONIS
PALOS HEIGHTS SCHOOL DISTRICT 128
12809 S MCVICKERS AVE
PALOS HEIGHTS IL 60463-2351
USA

Fax: 708-597-9089

PO Number: DAVE02152022

Account Manager: Monica Lee

Packing Slip: 148800

Terms: NET 30

Ordered: 2/15/2022

Tracking #: 1Z5547300392731467

F.O.B.: ORIGIN

Ship Via: UPS GROUND

Ship Date: 2/21/2022

Line	Part	Rev	Order Qty	Unit Price	Ext. Price	Net Ext. Price
1	E56BAND301BF	2	3.00	\$51.95	\$155.85	\$155.85
	CLOCK RC 12" ROUND SURFACE					
	BLACK CH 1 FULL BATTERY BOOSTER					

Subtotal: \$155.85

SHIPPING AND HANDLING \$20.26

Taxes:

Total US Dollars: \$176.11

**REMIT TO:**American Time
PO Box 707

Dassel, MN 55325-0707

ILPH07

854278

PALOS HEIGHTS SCHOOL DISTRICT
128

Due Date	Amount
3/23/2022	\$176.11

DISTRICT CHECK NO. VOUCHER NO. DATE

Palos Heights School District 128 42413 1069 10/18/2023

NET AMOUNT

EXPENSE

\$*****758.57

Seven Hundred Fifty Eight and 57/100 Dollars

AMERICAN TIME & SIGNAL, COMPANY
P O BOX 707
DASSEL, MN 553250707



⑈042413⑈ ⑆071915580⑆ 04⑈297⑈761⑈9⑈

PALOS HEIGHTS
SCHOOL DISTRICT #128
12809 SOUTH McVICKER • PALOS HEIGHTS, IL 60463

548	AMERICAN TIME & SIGNAL, COMPANY	1069	10/18/2023	42413
Vendor Number	Vendor Name	Voucher	Date	Check Number

PO Number	Invoice	Amount
0	871590	758.57

TOTAL:

\$758.57

AMERICAN TIME

140 3RD ST

PO BOX 707

DASSEL MN 55325-0707

USA

american  time.

Invoice: 871590

Invoice Date: 9/20/2023

Customer ID: ILPH07

Order: 963449

Sales (800) 328-8996

Fax (320) 275-2603

Billing (877) 666-1207

INVOICE

Page: 1 of 1

Bill To:

PALOS HEIGHTS SCHOOL DISTRICT 128

12809 S MCVICKER

PALOS HEIGHTS IL 60463 USA

Ship To:

Dave Adamonis

PALOS HEIGHTS SCHOOL DISTRICT 128

12809 S MCVICKERS AVE

PALOS HEIGHTS IL 60463-2351

USA

Fax: 708-597-9089

PO Number: Dave91323

Account Manager: Jessica Bondhus

Packing Slip: 165770

Terms: NET 30

Ordered: 9/13/2023

Tracking #: 1Z5547300393215675

F.O.B.: ORIGIN

Ship Via: UPS GROUND

Ship Date: 9/20/2023

Line	Part	Rev	Order Qty	Unit Price	Ext. Price	Net Ext. Price
1	E56BAND301BF 12" Atomic Wall Clock Full Battery Booster (Black Plastic, Dial 01)	2	12.00	\$56.95	\$683.40	\$683.40

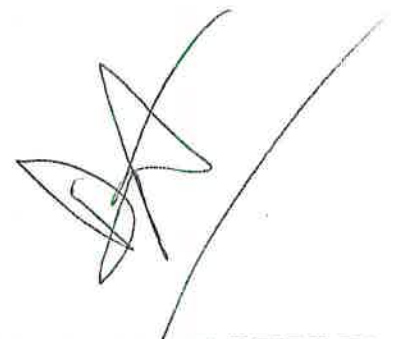
Subtotal: \$683.40

SHIPPING AND HANDLING \$75.17

Taxes:

Total US Dollars: \$758.57

205840411





Laura Kriha <lkriha@palos128.org>

FOIA Request

1 message

Kim Anoman <kanoman@palos128.org>

Tue, Apr 28, 2026 at 10:38 AM

To: hadlee.liu@thedatabranch.com, david@databranchusa.com

Cc: Merry! Brownlow <mbrownlow@palos128.org>, Laura Kriha <lkriha@palos128.org>

Mr. Callahan,

Per your FOIA request below, I have attached the invoices that we paid to American Time. This is currently all we have for records on this vendor. Mr. Liu is included in this email.

From: **David Callahan** <david@databranchusa.com>

Date: Fri, Apr 24, 2026 at 2:58 PM

Subject: FOIA Request [Ref: Hadlee Liu]

To: mbrownlow@palos128.org <mbrownlow@palos128.org>

CC: hadlee.liu@thedatabranch.com <hadlee.liu@thedatabranch.com>

Dear Public Records Officer,

Pursuant to the Illinois Freedom of Information Act (5 ILCS 140)

The Data Branch is hereby submitting a public records request for vendor procurement records.

Scope of Request:

We are requesting all executed contracts, agreements, purchase orders, and related procurement documents for products or services purchased from any of the following vendors or their authorized resellers, for the period January 1, 2021, to the present:

All products from: Primex, American Time, and/or Sapling.

We are seeking records that reflect the pricing structure of any such engagement, including per-unit costs, subscription or licensing terms, and implementation fees.

Requested Records (if readily accessible):

Please include any of the following that your agency maintains:

- Executed contracts, master service agreements, or order forms
- Purchase orders relating to the requested documents
- RFP or solicitation documents, including vendor responses and evaluation materials
- Task orders issued against cooperative purchasing agreements (e.g., Sourcewell, NASPO, OMNIA, or state contract vehicles)

Preferred Format & Delivery:

We understand recordkeeping systems vary across agencies. We are fully willing to receive:

- Spreadsheet exports (preferred)
- PDF or Word documents
- Standard ERP or finance system reports
- Any summary-level purchasing records your office already maintains

Commercial Nature & Flexibility:

This request is for commercial research purposes. We are happy to comply with all applicable policies and procedures and are willing to narrow, clarify, or adjust the request to make fulfillment easier for your office.

Please send all records to my colleague Hadlee Liu at the following:

Email: hadlee.liu@thedatabranch.com

Phone: (302) 585-3132

Address: [1111B S Governors Ave STE 21033, Dover, DE 19904](#)

If your reply does not keep recipients, please use this link instead: [email Hadlee Liu directly](#).

We appreciate your attention to this matter and look forward to your prompt response. Please confirm receipt of this request and provide an estimated date for the delivery of the requested records.

Thank you for your cooperation.

Sincerely,

The Data Branch Research Team

Kim Anoman

Business Manager

Palos Heights School District #128

708-597-9040



American Time & Signal.pdf

352K



Laura Kriha <lkriha@palos128.org>

FOIA request reply

1 message

Kim Anoman <kanoman@palos128.org>

Fri, May 1, 2026 at 11:26 AM

To: remy@databranchusa.com

Cc: Laura Kriha <lkriha@palos128.org>, Merryl Brownlow <mbrownlow@palos128.org>

Mr. Evans,

Per your FOIA request below, we do not have any records of purchases from the listed vendors back to 2021.

----- Forwarded message -----

From: **Remy Evans** <remy@databranchusa.com>

Date: Mon, Apr 27, 2026 at 10:14 AM

Subject: FOIA Request [Ref: Cash Wang]

To: mbrownlow@palos128.org <mbrownlow@palos128.org>

Cc: cash.wang@thedatabranch.com <cash.wang@thedatabranch.com>

Dear Public Records Officer,

Pursuant to the Illinois Freedom of Information Act (5 ILCS 140)

The Data Branch is hereby submitting a public records request for vendor procurement records.

Scope of Request:

We are requesting all executed contracts, agreements, purchase orders, and related procurement documents for products or services purchased from any of the following vendors or their authorized resellers, for the period January 1, 2021, to the present:

****All products from:**** Blackboard Inc, Finalsite, DMX, Funds for Learning, E-Rate Consulting, N-Able, Raptor Technologies, and/or CSM Consulting

We are seeking records that reflect the pricing structure of any such engagement, including per-unit costs, subscription or licensing terms, and implementation fees.

Requested Records (if readily accessible):

Please include any of the following that your agency maintains:

- Executed contracts, master service agreements, or order forms
- Purchase orders relating to the requested documents
- RFP or solicitation documents, including vendor responses and evaluation materials
- Task orders issued against cooperative purchasing agreements (e.g., Sourcewell, NASPO, OMNIA, or state contract vehicles)

Preferred Format & Delivery:

We understand recordkeeping systems vary across agencies. We are fully willing to receive:

- Spreadsheet exports (preferred)
- PDF or Word documents
- Standard ERP or finance system reports
- Any summary-level purchasing records your office already maintains

Commercial Nature & Flexibility:

This request is for commercial research purposes. We are happy to comply with all applicable policies and procedures and are willing to narrow, clarify, or adjust the request to make fulfillment easier for your office.

Please send all records to my colleague Cash Wang at the following:

Email: cash.wang@thedatabranch.com

Phone: (302) 585-3132

Address: [1111B S Governors Ave STE 21033, Dover, DE 19904](#)

If your reply does not keep recipients, please use this link instead: [email Cash Wang directly](#).

We appreciate your attention to this matter and look forward to your prompt response. Please confirm receipt of this request and provide an estimated date for the delivery of the requested records.

Thank you for your cooperation.

Sincerely,

The Data Branch Research Team

Kim Anoman

Business Manager

**Palos Heights School District #128
708-597-9040**



Laura Kriha <lkriha@palos128.org>

FOIA request reply

1 message

Kim Anoman <kanoman@palos128.org>

Wed, May 6, 2026 at 4:01 PM

To: ethan.petersen@thedatabranch.com, Laura Kriha <lkriha@palos128.org>, Merryl Brownlow <mbrownlow@palos128.org>, maya@databranchusa.com

Mr. Petersen,

Per your FOIA request below, we have no records of purchasing from any of the vendors that you have listed.

From: **Maya Brooks** <maya@databranchusa.com>

Date: Wed, May 6, 2026 at 1:26 PM

Subject: FOIA Request [Ref: Ethan Petersen]

To: mbrownlow@palos128.org <mbrownlow@palos128.org>

Cc: ethan.petersen@thedatabranch.com <ethan.petersen@thedatabranch.com>

Dear Public Records Officer,

Pursuant to the Illinois Freedom of Information Act (5 ILCS 140)

The Data Branch is hereby submitting a public records request for vendor procurement records.

Scope of Request:

We are requesting all executed contracts, agreements, purchase orders, and related procurement documents for products or services purchased from any of the following vendors or their authorized resellers, for the period January 1, 2021, to the present:

All products from Absolute Software, Incident IQ, Hazel Health, Brandon Industries, CSM Consulting, and Funds for Learning

We are seeking records that reflect the pricing structure of any such engagement, including per-unit costs, subscription or licensing terms, and implementation fees.

Requested Records (if readily accessible):

Please include any of the following that your agency maintains:

- Executed contracts, master service agreements, or order forms
- Purchase orders relating to the requested documents
- RFP or solicitation documents, including vendor responses and evaluation materials
- Task orders issued against cooperative purchasing agreements (e.g., Sourcewell, NASPO, OMNIA, or state contract vehicles)

Preferred Format & Delivery:

We understand recordkeeping systems vary across agencies. We are fully willing to receive:

- Spreadsheet exports (preferred)
- PDF or Word documents
- Standard ERP or finance system reports
- Any summary-level purchasing records your office already maintains

Commercial Nature & Flexibility:

This request is for commercial research purposes. We are happy to comply with all applicable policies and procedures and are willing to narrow, clarify, or adjust the request to make fulfillment easier for your office.

Please send all records to my colleague Ethan Petersen at the following:

Email: ethan.petersen@thedatabranch.com

Phone: (302) 585-3132

Address: [1111B S Governors Ave STE 21033, Dover, DE 19904](#)

If your reply does not keep recipients, please use this link instead: [email Ethan Petersen directly](#).

We appreciate your attention to this matter and look forward to your prompt response. Please confirm receipt of this request and provide an estimated date for the delivery of the requested records.

Thank you for your cooperation.

Sincerely,

The Data Branch Research Team

Kim Anoman

Business Manager

Palos Heights School District #128

708-597-9040



Laura Kriha <lkriha@palos128.org>

PIA Request completion

1 message

Kim Anoman <kanoman@palos128.org>

Wed, Apr 15, 2026 at 11:13 AM

To: c.carlos@employee researchdata.org

Cc: Laura Kriha <lkriha@palos128.org>, Merryl Brownlow <mbrownlow@palos128.org>

Mr. Carlos,

Per your FOIA email below, attached you will find the information that you are requesting. If you have any questions, please let me know.

----- Forwarded message -----

From: **C Carlos** <c.carlos@employee researchdata.org>

Date: Fri, Apr 10, 2026 at 11:29 PM

Subject: PIA Request

To: mbrownlow@palos128.org <mbrownlow@palos128.org>

April 10, 2026

Merryl Brownlow, Superintendent
Palos Heights SD 128

Dear Ms. Brownlow,

I am writing to request access to certain public records pursuant to the **Illinois Freedom of Information Act (5 ILCS 140/1 et seq.)**.

Specifically, I am requesting the following information for district employees:

- First and last names
- Job titles/positions
- Work email addresses
- Primary campus or department

If available, I would appreciate receiving this information in an electronic format (Excel or .csv) via email.

If this request is better directed to another contact, I would be grateful if you could kindly point me in the appropriate direction.

Please let me know in advance if there are any fees associated with fulfilling this request. I would appreciate consideration of a fee waiver, as the information is being requested for general research and informational purposes.

Under the Illinois Freedom of Information Act, I understand that the agency is required to respond within:

- 5 business days

indicating whether the requested records will be provided. If access is granted, records should be produced within a reasonable time thereafter as permitted by law.

If any portion of this request cannot be fulfilled, please provide the applicable statutory basis for the denial and any available options for appeal or clarification.

Thank you for your time and assistance.

Sincerely,

Carla Carlos

c.carlos@employeeresearchdata.org

Employee Research Data LLC

Kim Anoman

Business Manager

Palos Heights School District #128

708-597-9040



FOIA Staff List FY26.xlsx

16K