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Special Policy Update: August 1, 2013



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To access the revised sample policies distributed with this *Special Policy Update* in both Word and PDF formats, [click here](#).

Policies revised to reflect SB 10-191's evaluation requirements for 2013-14 school year

SB 10-191, commonly referred to as the Educator Effectiveness Act, requires all Colorado school districts to implement a licensed personnel performance evaluation system in the upcoming 2013-14 school year that aligns with the state's teacher and principal quality standards and the rules of the State Board of Education (SBE). We would like to thank the attorneys of Caplan and Earnest, LLC for their expertise and willingness to consult with CASB policy counsel as we worked on this *Special Policy Update*.

In anticipation of the 2013-14 implementation of SB 10-191's evaluation requirements, districts were required to notify CDE on or before July 1, 2013, regarding the local board's decision to implement its own distinct evaluation system, the Colorado State Model System for the Evaluation of Licensed Personnel, or a combination of the two. At this point, every local board of education, in consultation with district staff, community members and the district's personnel performance evaluation council (often referred to as the 1338 council), should have made a decision regarding its licensed personnel evaluation system for the upcoming school year.

Simplified approach

Given the extensive nature of SB 10-191's requirements as well as the creation of a state model evaluation system, we decided it would be most helpful to our membership if we simplified our approach in the CASB Core Sample Policy Manual. Accordingly, we created new sample policy **GCO, Evaluation of Licensed Personnel** and accompanying sample regulation **GCO-R** instead of revising existing CASB sample evaluation policies. We also avoided reiterating state law in these new samples, unless it served the board's or district's interests to do so.

Due to the creation of new sample policy **GCO** and sample regulation **GCO-R**, we deleted CASB sample policies **GCOA, Evaluation of Instructional Staff** and **GCOC, Evaluation of Administrative Staff** and accompanying regulations **GCOA-R** and **GCOC-R** from the CASB Core Sample Policy Manual. If the board chooses to adopt sample policy **GCO**, it should then repeal other board policies pertaining to the evaluation of licensed staff because these will be duplicative of policy **GCO**. We hope the simplified approach in sample policy **GCO** and sample regulation **GCO-R** will better complement the roles that the board and administration play in the evaluation of teachers, administrators, and other licensed personnel under the "Licensed Personnel Performance Evaluation Act," C.R.S. 22-9-101 *et seq.* (Evaluation Act), as amended by SB 10-191.

Evaluations of specialized service providers

Although the Evaluation Act applies to the evaluation of ALL licensed personnel, SB 191's evaluation requirements for licensed, specialized service professionals (e.g. school psychologists) do not go into effect until the 2014-15 school year. The SBE will consider and adopt rules applicable to the evaluation of specialized service professionals this fall. As a benefit of your CASB membership, we are actively involved in the development of these rules. Because the new CASB samples refer to "teacher," "principal" and "licensed personnel" in accordance with the Evaluation Act, we are hopeful that we will not need to make additional revisions to new CASB sample policy **GCO** or sample regulation **GCO-R** once the SBE adopts these rules.

Effects of statewide implementation

We received confirmation from the Colorado Department of Education (CDE) that the Commissioner of Education notified the revisor of statutes on June 28, 2013, that statewide implementation of the licensed personnel performance evaluation system based on quality standards has occurred. This notification means that certain provisions of the Evaluation Act and the "Teacher Employment, Compensation and Dismissal Act of 1990," C.R.S. 22-63-101 *et seq.* (TECDA) are repealed and other provisions of these two laws became effective. *Compare*, C.R.S. 22-9-106 (4.5)(a) (repealed) and C.R.S. 22-9-106 (4.5)(b) (now effective); C.R.S. 22-63-202 (2)(c.5)(II) (repealed) and C.R.S. 22-63-202 (2)(c.5)(III) (now effective).

Due to the repeal of certain provisions of the Evaluation Act, the biggest change reflected in new sample policy **GCO** and sample regulation **GCO-R** as well as districts' evaluation practices is districts are no longer required to create a remediation plan for a teacher or principal who receives an ineffective performance rating. Instead, the Evaluation Act now requires districts to provide the following when performance is deemed ineffective: (1) written notice of the ineffective rating; (2) a copy of the documentation relied upon in measuring performance; and (3) "identification of deficiencies." C.R.S. 22-9-106 (3.5)(b)(I), (4.5)(b). The Evaluation Act contains conflicting language regarding to whom these three requirements apply, however. One of the Evaluation Act's provisions states that these three requirements apply to "a teacher or principal" whose performance is deemed ineffective. C.R.S. 22-9-106 (3.5)(b)(I). Another provision states that when "any person" receives a second rating of ineffective, the district shall provide written notice, etc. and "identification of deficiencies." C.R.S. 22-9-106 (4.5)(b).

Given this conflicting language, we took a conservative approach in new sample regulation **GCO-R** by requiring the district to provide written notice, etc. for any licensed staff member who receives a performance rating of ineffective. We encourage you to discuss this issue with the school district's counsel in determining the district's approach.

As before, the Evaluation Act continues to require that all licensed staff receive "a written improvement plan" as part of the staff member's evaluation report. C.R.S. 22-9-106 (3)(b). Such "improvement plan" shall be "specific as to what improvements, if any, are needed in the performance of the licensed personnel and shall clearly set forth recommendations for improvements, including recommendations for additional education and training during the teacher's or principal's license renewal process." *Id.* New CASB sample regulation **GCO-R** includes language to address this statutory requirement.

Appeals process

We also took a conservative approach in interpreting the Evaluation Act to require an appeals process beginning in the 2013-14 school year for nonprobationary teachers to appeal an ineffective rating. See, page 3 of new sample regulation **GCO-R**, C.R.S. 22-9-106 (4.5)(b). The optional language in new sample regulation **GCO-R** is similar to the language regarding appeals in the SBE rules. See, 1 CCR 301-87, Rule 5.04(A)(2).

Please note that CDE staff and others are relying upon the SBE rules and the lack of clarity in the statute to interpret that an appeal process is not required until the nonprobationary teacher receives his or her *second* consecutive rating of ineffective or *partially effective*. 1 CCR 301-87, Rule 5.04(A)(1) (emphasis added). Because the 2013-14 school year is a "hold harmless" year that does not count toward the possible loss of nonprobationary status, a nonprobationary teacher is not at risk of losing his or her nonprobationary status until the 2015-16 school year at the earliest. C.R.S. 22-9-105.5(10)(a)(IV)(B). Thus, CDE staff and others believe an appeal process does not have to be provided until the 2015-16 school year. Again, we encourage districts to consult with their attorney regarding the district's approach to this issue.

Definition of probationary teacher

Now that districts will begin to evaluate teachers based on their “effectiveness,” we revised CASB sample policy **GC, Professional Staff**, to reflect the new definition of “probationary teacher,” in accordance with C.R.S. 22-63-103 (7). As stated in the explanatory note to this sample policy, this is another example of the difference between the statutory definition and the SBE rules. For this reason, we encourage districts to consult with their own attorney on this issue. We also added clarifying language to CASB sample policy **GCKB, Administrative Staff Assignments and Transfers** to reflect the calculation of the probationary period for a probationary teacher serving as superintendent.

2013 legislation affects the Evaluation Act

HB 13-1257, which is currently effective, revised the Evaluation Act’s provisions regarding distinct evaluation systems. As revised by HB 13-1257, the Evaluation Act now requires CDE to monitor and approve any distinct evaluation system and ensure such system is consistent with the Evaluation Act’s requirements. C.R.S. 22-9-106 (6). Further, HB 13-1257 allows a local board “or any interested party” to submit to CDE any data related to a distinct evaluation system for CDE’s review. C.R.S. 22-9-106 (1.5)(a). If CDE determines the district’s distinct evaluation system is not consistent with state law, it may require the district to adopt some or all of the state model evaluation system. Such remedy shall be “as a last resort.” C.R.S. 22-9-106 (1.5)(c)(II)(C).

Given the ability of “interested parties” to request a review of a district’s distinct evaluation system as well as other language in HB 13-1257, we strongly encourage those districts with distinct evaluation systems to submit their systems to CDE for approval. That way, the district will hopefully prevent “interested parties” from claiming that the system does not comply with the Evaluation Act. Again, however, we encourage our members to consult with their own counsel in interpreting HB 13-1257. We did not make any policy revisions to address this bill. Please note that while we interpret CDE’s monitoring authority to not be as expansive concerning those districts that implement the Colorado State Model Evaluation System, CDE plans to monitor those districts that implement the state model as well. See, 1 CCR 301-87, Rule 6.04.

Another 2013 bill, HB 13-1220, also amended the Evaluation Act to specifically state that confidential evaluation reports and public records used in preparing evaluation reports “are available to individuals responsible for reviewing an appeal” made by a nonprobationary teacher. C.R.S. 22-9-109 (1)(b). This bill is also currently effective and re-emphasizes that while districts may use the information collected in evaluating licensed personnel to fulfill their duties as required by law, “the identity of individual educators. . . must otherwise remain confidential and must not be published or publicly disclosed in any way that would identify an individual educator.” C.R.S. 22-9-109 (2). We revised CASB sample policy **GBJ, Personnel Records and Files** to address this bill. Other revisions to sample policy **GBJ** are to better protect the district’s interests.

As mentioned throughout this article, questions remain regarding the interpretation of SB 10-191’s requirements pertaining to the acquisition and loss of a teacher’s nonprobationary status as well as other issues. To best protect our members’ interests, we took a conservative approach in creating new sample policy **GCO** and regulation **GCO-R** and revising other CASB sample policies. Due to the lack of clarity in SB 10-191 as well as contradictions between the law and the SBE rules, we encourage you to seek advice from the school district’s counsel when considering these policy revisions.

- [GBJ, Personnel Records and Files](#)
- [GC, Professional Staff](#)
- [GCKB, Administrative Staff Assignments and Transfers](#)
- [GCO, Evaluation of Licensed Personnel \(NEW\)](#)
- [GCO-R, Evaluation of Licensed Personnel \(Regulation - NEW\)](#)
- [HB 13-1220, Confidentiality of an individual educator’s performance data](#)
- [HB 13-1257, Working collaboratively with educators to develop a distinctive local-level personnel evaluation system for educators](#)
- [CASB webpage, “Educator Effectiveness” \(SB 191\)](#)

CASB resolution prompts law allowing electronic participation in school board meetings

Due to the passage of SB 13-015, inclement weather, onerous travel schedules and other extenuating circumstances may no longer prevent school board members from attending local board meetings. SB 13-015 originated from a CASB resolution adopted at last October’s Delegate Assembly, which then gathered support and traveled quickly through the state legislature to become law. SB 13-015 becomes effective August 7, 2013.

SB 13-015 provides that school boards “may” adopt a policy authorizing board members to “attend and participate in regular or special meetings electronically.” C.R.S. 22-32-108 (7)(a). If the board adopts such a policy, the policy must ensure: (1) the meeting is open to the public; (2) any board member participating electronically is included in the recording of the meeting; (3) a quorum of the board is *physically present* in one location; (4) board members are allowed to attend meetings electronically “only when there are extenuating circumstances”; (5) the board has discretion to determine the maximum number of board meetings a member may attend electronically before the member’s position is declared vacant; (6) the technology used allows the public to hear the comments made by the board member attending electronically and vice versa; and (7) the method(s) by which a board member may attend a meeting electronically are clearly described. C.R.S. 22-32-108 (7).

CASB developed new sample policy **BEAA***, **Electronic Participation in School Board Meetings** as a resource for local boards

wishing to adopt a policy allowing electronic participation. Again, this is a policy option that may be allowed at the discretion of the local board. We encourage boards to discuss the benefits of such a policy while considering the unique needs and circumstances of the local community and then proceed accordingly. Please note that if the board chooses **not** to adopt such a policy, we interpret this new law to prohibit a board member from participating in meetings electronically.

A board member participating electronically is considered "present"

SB 13-015 also clarifies that a board member who is participating electronically in conformance with the board's policy is considered "present" at the meeting for purposes of voting to transact business other than that stated in the notice of a special meeting and also for voting at any meeting by roll call. C.R.S. 22-32-108 (7)(a); see also, C.R.S. 22-32-108 (4) and (6).

We added a legal reference to sample policies **BEDB, Agenda** and **BEDF, Voting Method** to clarify that a board member participating electronically in conformance with policy **BEAA*** is considered to be "present" at the board meeting. We also added sample policy **BEAA*** as a cross reference to sample policies **BE, School Board Meetings** as well as **BEDB** and **BEDF**. Please note that similar edits to local board policy are only necessary if the board adopts a policy allowing electronic participation.

BOCES boards allowed to participate via video or audio conference

Although electronic meeting participation is not new to BOCES boards, SB 13-015 expands current methods of electronic participation to include audio conferences. C.R.S. 22-5-104 (5).

Since 1999, state law has permitted a BOCES to adopt a policy authorizing the board to conduct its meetings using video teleconferencing technology. *Id.* SB 13-015 amends this statutory provision to allow a BOCES board to adopt a policy authorizing a board member's electronic participation by using video *or audio* conferencing technology that allows board members to view or hear each other. *Id.*

SB 13-015 also strikes the statutory provision prohibiting a BOCES board from convening in executive session during a meeting when one or more board members is participating electronically. We are currently developing a BOCES sample policy manual and will address SB 13-015 in any applicable sample BOCES policies.

- [BE, School Board Meetings](#)
- [BEAA*, Electronic Participation in School Board Meetings](#)
- [BEDB, Agenda](#)
- [BEDF, Voting Method](#)
- [SB 13-015, Electronic participation in meetings of school district boards of education](#)

Board members required to sign affidavit stating compliance with confidentiality requirements

SB 13-015 also requires school board members and BOCES board members to sign an affidavit stating that the board member is aware of and will comply with the confidentiality requirements and restrictions applicable to the board's executive sessions, as described in C.R.S. 24-6-402 (Colorado's open meetings law). Local boards of education and BOCES boards must sign the affidavit regardless of whether the board adopts a policy permitting electronic participation.

The affidavit must be signed during the school board's biennial organizational meeting (i.e. when the board selects its officers after the biennial school director election.) C.R.S. 22-32-108 (5)(a); *see also*, C.R.S. 22-32-104 (1). For BOCES boards, the affidavit must be signed at any meeting at which the BOCES elects officers. C.R.S. 22-5-105 (2). School districts must then keep and preserve the signed affidavits with the minutes of board meetings. C.R.S. 22-32-108 (5)(a).

As a reminder of this new requirement, we added a note to CASB sample policies **BDA, Board Organizational Meeting** and **BEC, Executive Sessions**. CASB's member legal resources team developed a sample **Affidavit** to meet this statutory requirement, which is provided below.

- [BDA, Board Organizational Meeting](#)
- [BEC, Executive Sessions](#)
- [Sample affidavit affirming compliance with confidentiality requirements and restrictions applicable to executive sessions \(DOC\)](#)
- [SB 13-015, Electronic participation in meetings of school district boards of education](#)

Changes to conduct and ethics laws result in policy revisions

The 2012 legislature significantly revised the laws pertaining to conduct by public officials and government employees as well as the laws governing the disclosure of gifts and honoraria received by elected officials, including school board members.

Under Colorado law, board members and district employees hold positions of public trust and, therefore, owe a fiduciary duty to the public. C.R.S. 24-18-103 (1). This means that board members and district employees must carry out their duties for the benefit of the people of the district, rather than as a means of advancing their own personal financial interests. Among other provisions

relating to the standards of conduct applicable to public officials and government employees, state law prohibits board members and district employees from accepting a gift of substantial value or substantial economic benefit if: (1) doing so would tend to improperly influence a reasonable person from impartially carrying out his or her official duties; or (2) a reasonable person in the board member's or employee's position should know the gift is primarily to reward the board member or employee for official action taken. C.R.S. 24-18-104 (1). Proof beyond a reasonable doubt that the board member or district employee violated this prohibition is "proof that the actor has breached his fiduciary duty and the public trust." *Id.*

SB 12-146 expanded the definition of "economic benefit tantamount to a gift of substantial value," thereby expanding the types of gifts that board members and district employees are prohibited from receiving if it meets the two listed factors above. See, C.R.S. 24-18-104 (2)(b). Similar to the language added to C.R.S. 24-18-104, SB 12-146 also expanded the prohibitions applicable to local government officials and employees. See, C.R.S. 24-18-109 (2)(c). Additionally, HB 12-1070 revised the rules of conduct by expanding the list of those items that are not considered "gifts of substantial value" or "substantial economic benefit." In redefining these two terms, HB 12-1070 incorporates many of the provisions from Amendment 41 of the Colorado Constitution, which concerns ethics in government. Amendment 41 itself, however, does not apply to board members or district employees.

In reviewing the applicable CASB sample policies to address these bills, we decided it would be more helpful to our members to simplify the policies and focus on the basic standards of conduct rather than include the minutiae of the laws. Thus, we deleted any policy provisions that restated the statutory language revised by SB 12-146 and HB 12-1070 and instead created explanatory notes. We also deleted any policy language referencing the ability to seek an advisory opinion from the secretary of state because this statutory provision was previously repealed. Finally, we made additional changes for purposes of clarification. Such revisions were made to the following CASB sample policies: **BC, School Board Member Conduct**; **BCB, School Board Member Conflict of Interest**; **CBF, Superintendent's Conduct**; and **GBEB, Staff Conduct**.

HB 12-1070 also expanded the statutory language concerning the ethical principles applicable to board members and district employees. To address this statutory change, we added a new paragraph to CASB sample exhibits **BCA-E-2, Board Member Code of Ethics** and **GBEA-E, Staff Ethics/Conflict of Interest**.

Finally, although we addressed the changes made by HB 12-1070 to the public official disclosure laws this past October, we recommend further revisions to sample regulation **BC-R, School Board Member Financial Disclosure** at this time. The additional revisions simplify this sample regulation by focusing on the board member's statutory obligations under the Public Official Disclosure Law, rather than list the exceptions to these statutory obligations. As a reminder, the next quarterly report listing any gifts or honoraria required to be reported must be filed on or before October 15, 2013.

- [BC, School Board Member Conduct](#)
- [BC-R, School Board Member Financial Disclosure \(Regulation\)](#)
- [BCA-E-2, Board Member Code of Ethics \(Exhibit\)](#)
- [BCB, School Board Member Conflict of Interest](#)
- [CBF, Superintendent's Conduct](#)
- [GBEA-E, Staff Ethics/Conflict of Interest \(Exhibit\)](#)
- [GBEB, Staff Conduct \(and Responsibilities\)](#)
- [SB 12-146, Limitations on the acceptance of certain benefits by specified governmental actors](#)
- [HB 12-1070, Modification of statutory provisions governing the ethical conduct of persons involved in government](#)

The Colorado Civil Union Act reshapes local policy

After several failed attempts in prior legislative sessions, the 2013 state legislature extensively deliberated and ultimately passed SB 13-011, the "Colorado Civil Union Act," C.R.S. 14-15-101 *et seq.* (the Act). The Act grants specific rights to partners in a civil union, and as a result, has policy implications for employers, including school districts.

The Act defines "civil union" as "a relationship established by two eligible persons . . . that entitles them to receive the benefits and protections and be subject to the responsibilities of spouses." C.R.S. 14-15-103 (1). Among other rights and benefits, the Act entitles a partner in a civil union to: (1) unemployment benefits, C.R.S. 14-15-107 (5)(f); (2) designation as a beneficiary under the state public employees' retirement system, C.R.S. 14-15-107 (5)(i); (3) family leave benefits, C.R.S. 14-15-107 (5)(r); and (4) beginning January 1, 2014, life and health insurance coverage, including the ability to cover a party to a civil union as a dependent, C.R.S. 14-15-107 (5)(y).

Given the language of the Act and to best protect the district's interests against a claim of unlawful discrimination on the basis of sexual orientation, we revised those CASB sample leave policies that addressed any leaves afforded to the employee due to the illness, etc. of the employee's spouse. Thus, we added "partner in a civil union" to CASB sample policies **GBGG, Staff Sick Leave** and **GBGJ, Staff Bereavement Leave**. We also revised CASB sample policy **GBEA, Staff Ethics/Conflict of Interest** to include "partner in a civil union" in the definition of "immediate family" as a means to prohibit a district employee from supervising, etc. his or her partner. Finally, we added the Act to the legal references of these three policies.

We recommend the board (as appropriate) and district human resource personnel review local board policies, staff agreements, contracts, handbooks and other employee documents to ensure the district's compliance with the Act.

- [GBEA, Staff Ethics/Conflict of Interest](#)
- [GBGG, Staff Sick Leave](#)

- [GBGJ, Staff Bereavement Leave](#)
- [SB 13-011, Colorado Civil Union Act](#)

New laws expand the protections of the Family and Medical Leave Act

HB 13-1222, the “Family Care Act” expands the group of family members for whom Colorado employees may take leave from work under the federal “Family and Medical Leave Act of 1993” (FMLA).

The Family Care Act, which becomes effective August 7, 2013, states that in addition to the leave to which an employee is entitled under the FMLA, an employee is entitled to FMLA leave to care for a person who has a serious health condition if the person is the employee’s “partner in a civil union” (as defined by the Colorado Civil Union Act) or is the employee’s “domestic partner.” To qualify as the employee’s “domestic partner,” the domestic partnership must be registered with the municipality in which the employee resides or with the state, or be recognized by the employer as the employee’s domestic partner. C.R.S. 8-13.3-203 (1) (b). Because the Family Care Act extends protections to the employee’s “domestic partner” as well as the employee’s “partner in a civil union,” we added both terms to CASB sample policy **GBGF, Federally-Mandated Family and Medical Leave**, and accompanying sample regulation **GBGF-R**. We also added the Family Care Act and the relevant provision of the Colorado Civil Union Act to the legal references of sample policy **GBGF**.

Please note that if the district denies the employee FMLA leave to care for the employee’s partner in a civil union or domestic partner, the Family Care Act provides that the district may be subject to damages and equitable relief in accordance with the FMLA.

We also revised sample policy **GBGF** to address new federal regulations under the FMLA. These regulations became effective March 8, 2013 and expand the military caregiver leave provisions by defining a current servicemember’s serious injury or illness to include injuries or illnesses that existed prior to the servicemember’s active duty but were aggravated in the line of duty on active duty. Thus, we revised the language concerning military caregiver leave to include injuries “aggravated” as well as incurred in the line of duty.

- [GBGF, Federally-Mandated Family and Medical Leave \[Revised February 14, 2014\]](#)
- [GBGF-R, Federally-Mandated Family and Medical Leave \(Regulation\) \[Revised February 14, 2014\]](#)
- [HB 13-1222, Expansion of the group of family members for whom Colorado employees are entitled to take leave from work under the federal “Family and Medical Leave Act of 1993”](#)

Miscellaneous policy revisions and repeals

As we reviewed Section B (Board Governance and Operations) and Section G (Personnel) of the CASB Core Sample Policy Manual in preparation for this *Special Policy Update*, we discovered other sample policies in these two sections that required revision. We appreciate the valuable input we received from members and school attorneys in making these suggested revisions to the CASB samples.

We revised several sample policies and regulations in these two sections due to recent changes in state statute or rules of the State Board of Education (SBE). For purposes of simplicity, we created new regulations regarding the reporting of allegations against and crimes committed by licensed staff. We also improved the language in several sample policies to clarify the policy’s terms and/or better protect the district’s and board’s legal interests.

For these reasons, we recommend revisions to the following CASB sample policies and regulations:

- [BDFC*, Preschool Council](#)
- [BID/BIE, School Board Member Compensation/Expenses/Insurance/Liability](#)
- [GBK-R, Staff Concerns/Complaints/Grievances \(Regulation\)](#)
- [GCE/GCF-R, Professional Staff Recruiting/Hiring \(Regulation\)](#)
- [GCQC/GCQD, Resignation of Instructional Staff/Administrative Staff](#)
- [GCQC/GCQD-R, Resignation of Instructional Staff/Administrative Staff \(Mandatory Reporting Requirements\) \(Regulation – NEW\)](#)
- [GCQF, Discipline, Suspension and Dismissal of Professional Staff \(and Contract Nonrenewal\)](#)
- [GCQF-R, Discipline, Suspension and Dismissal of Professional Staff \(Mandatory Reporting Requirements\) \(Regulation – NEW\)](#)
- [GDE/GDF-R, Support Staff Recruiting/Hiring \(Regulation\)](#)

We also deleted the following sample policies from the CASB Core Sample Policy Manual because they are unnecessary and/or duplicative of other sample policies. Please review any corresponding local board policies to determine if they should be repealed from the board’s policy manual.

- BGA, Policy Implementation
- JJ, Student Activities (Cocurricular and Extracurricular)

If you have questions regarding these policy revisions, please contact [Kathy Shannon](#), policy counsel, at 303-832-1000 ext. 3800.

CASB's Complimentary Policy Manual Audit Service

CASB policy staff will conduct a "spot check" of your Board's policy manual to answer the following questions:

- Does your manual contain the legally-required policies?
- Is the manual as effective as it should be?
- What could be done to improve the manual?
- Could the overall organization and format be improved?

Contact [Lynne Hunt](#), policy specialist, at 303-832-1000 ext. 3802 to schedule your complimentary audit today!

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