

WOONSOCKET EDUCATION DEPARTMENT

Transgender Student Non-Discrimination Policy

General Belief Statement:

The Woonsocket Education Department (the “Department”) is committed to creating a safe and inclusive learning environment for all students and a safe and inclusive working environment for all staff, free from discrimination, regardless of sex, sexual orientation, gender identity or gender expression and providing every student with equal access to all Department educational programs and activities.

Purpose:

The following policy relates to students who are transgender and students who do not conform to gender role stereotypes. This policy serves two important purposes. First, many provisions of this policy facilitate compliance with the Department's legal obligations. Under many circumstances, an individual's transgender or gender nonconforming status serves as a basis for legal rights and protections. Second, even where specific actions may not be required by applicable law, this policy is intended to further the Department's local goals concerning the creation and maintenance of positive and supportive environments that appropriately provide for the education, safety, and welfare of all students.

While this policy provides important direction to Department employees, students, school families, and other persons, it does not anticipate every situation that might occur with respect to students who are transgender or gender nonconforming. When an issue or concern arises that is not anticipated or directly addressed by this policy, the needs and concerns of each student will be assessed on an individualized basis and in consultation with parents/guardians where appropriate.

This policy covers conduct that takes place in the school, on school property, at school-sponsored functions and activities, on school buses or vehicles and at bus stops. This policy also pertains to usage of electronic technology and electronic communication that occurs in the school, on school property, at school-sponsored functions and activities, on school buses or vehicles and at bus stops, and on school computers, networks, forums, and mailing lists. This policy applies to the entire school community, including educators, school and Department staff, students, parents, and volunteers.

1. Definitions

The definitions below are not intended to label students but rather to assist in understanding these guidelines and the expectations of staff in complying with Department policies and legal requirements. Students might or might not use these terms to describe themselves.

- a. **“Transgender”** is an umbrella term used to describe a person whose gender identity or gender expression is different from that traditionally associated with their assigned sex at birth.
 - b. **“Gender”** is the state of being male or female (masculine or feminine). It refers to the behaviors, attitudes and other characteristics that a given culture or society associates with a person’s biological sex.
 - c. **“Gender identity”** is a person’s deeply held sense or psychological knowledge of their own gender, regardless of the biological sex they were assigned at birth. Everyone has a gender identity.
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- d. **“Gender expression”** refers to the way a person expresses gender, such as clothing, hairstyles, activities or mannerisms.
- e. **“Gender nonconforming”** is a term used to describe people whose gender expression differs from stereotypic expectations. This includes people who identify outside traditional gender categories or identify as both genders. Other terms that can have similar meanings include “gender variant”, “gender expansive”, or “gender atypical”.
- f. **“Biological sex”** refers to a person’s biological status at birth as determined by genetic and anatomical characteristics (chromosomes, hormonal profiles, and internal and external sex organs).

2. Discrimination, Harassment and Bullying

The Department prohibits all forms of discrimination against any transgender student or any student who does not conform to gender role stereotypes. Further, existing Department policies that prohibit the harassment and bullying of students apply in full force to any such actions that are based on a student's actual or perceived transgender status or gender nonconformity. The scope of this responsibility includes ensuring that any incident of discrimination, harassment, or bullying is given immediate attention; investigating the incident; taking age and developmentally appropriate corrective action and/or disciplinary action; and, providing students and staff with appropriate resources and education. Complaints alleging discrimination, harassment or bullying based on a person's actual or perceived transgender status or gender nonconformity are to be handled in the same manner as other discrimination, harassment, and bullying complaints.

3. Student Privacy/Confidentiality, Names and Pronouns and Official School Records

(1) All persons, including students, have a right to privacy, and this includes the right to keep one’s transgender status private at school.

(2) Certain records and personally-identifiable information related to the student's gender status or biological sex may be protected as an education record and/or as a confidential medical or patient health care record. The Department recognizes that a student may have a strong individual interest in maintaining the privacy of the student’s transgender status or their gender nonconforming presentation at school.

Accordingly, in addition to adhering to all legal standards of confidentiality [including the federal Family Educational Rights and Privacy Act (FERPA), state laws governing the confidentiality of student records, and state and federal laws governing the confidentiality of medical and patient health care records], school personnel with knowledge of any student's transgender status or gender nonconforming presentation are expected to treat that information as being particularly sensitive, even internally among school staff and school officials. School staff shall not disclose information that may reveal a student’s transgender status to others, including other school staff, unless legally required to do so or authorized to do so under state and federal laws governing the confidentiality of student records. Department employees are expected to refer any questions they may have about student privacy and possible disclosures of a student's transgender or gender nonconforming status to the Department’s Human Resources Director or the Director’s designee.

(3) The Department strongly encourages transgender and gender nonconforming students and their families (if family is involved) to maintain ongoing communication with the school employees who

are working directly with the student in order to address, among other issues, relevant privacy concerns and privacy preferences. In some cases, transgender students may feel more supported and safe if other students are aware that they are transgender. In these cases, school staff should work closely with the student and, if family is involved, the student's family, including the parent(s) or guardian(s) of minor students, on a plan to inform and educate the student's peers. When developing this plan, it may be appropriate to engage external resources and support organizations to assist in the educational efforts.

(4) Nothing in these guidelines is intended to deny the right of transgender and gender nonconforming students to discuss and express their gender identity and expression openly. The fact that a student chooses to disclose their transgender status and share private information with staff or other students, however, does not authorize school staff to disclose student record information (including medical and patient health care records) with others, except as authorized by applicable laws and policies governing the confidentiality of student records.

(5) Students have the right to be addressed by a name and pronoun that corresponds to the student's gender identity. Upon being informed that a student intends to regularly use a particular name and/or prefers to be addressed using particular pronouns that correspond to the student's gender identity, school personnel are expected to respect that decision. A court ordered name change or medical treatment or medical procedure is not required to initiate such a request. If appropriate, Department staff may also privately ask transgender or gender non-conforming students at the beginning of the school year how they want to be addressed in class, in correspondence to the home, or at conferences with the student's parent(s) or guardian(s).

The school, student and family (if the family is involved) should be engaged and develop a plan for using the preferred name and pronoun within the school. The plan could include when and how this is communicated to staff, to students and to the parents of other students. In the case of a transgender student who is enrolling at a new school, it is important that the school respect the student's privacy and preferred name.

(6) The Department's approach of respecting a student's decision to regularly use a name and the pronouns that correspond to the student's gender identity is not a commitment to change all existing school records, including but not limited the student's permanent record card, in order to reflect those preferences. Further, there may be situations where the Department is required to use or report the legal name or biological sex of the student as that data is reflected in the Department's official records. The extent to which official records of the Department are modified will depend on a case-by-case evaluation of the information that the Department receives and the type(s) of school records affected by the information that is received. For example, when a student changes their legal name and that change is sufficiently substantiated, the Department will issue a high school transcript under the student's new legal name.

(7) Certified school nurse teachers and other licensed professionals need accurate and reliable information to confirm a student's identity in order to ensure that the student receives appropriate care and to enable them to coordinate care with other health care providers or licensed professionals, as well as to file health insurance claims. Nurses are legally required, per the RI Rules and Regulations for School Health Programs, to maintain an individual school health record for every student that accurately documents clinical information relating to their patients and must keep their patients' health records confidential. In the case of a transgender student, a school nurse should use the student's preferred name, and should use the student's birth name only when necessary to ensure that the student receives appropriate care and to enable the school nurse to coordinate care for the student with other health care providers or licensed professionals, as well as to file health insurance claims.

4. Restroom and Locker Room Accessibility

(1) In most cases, a student who is transgender will be permitted to access the men's/women's segregated restrooms that correspond to the gender identity that the student consistently asserts at school and in other social environments. Any student who has a need or desire for increased privacy, regardless of the underlying reason, may be provided with access to a single-access restroom where such a facility is reasonably available, but no student shall be required to use such a restroom because of the student's transgender or gender nonconforming status.

(2) If a transgender student makes any request regarding the use of locker rooms or any similar type of changing area, the request shall be assessed on a case-by-case basis with the goals of:

- a) facilitating the transgender student's access to the Department's physical education curriculum and other relevant programs;
- b) ensuring adequate student privacy and safety; and
- c) minimizing stigmatization of the transgender student.

The physical layout of the facility and the degree of undress required when changing for the applicable activity are examples of factors that will be considered in making the arrangements. There is no absolute rule that, in all cases, will require a transgender student to access and use only the locker rooms and other changing areas that correspond to the biological sex that the student was assigned at birth.

(3) Any student who has a need or desire for increased privacy, regardless of the underlying reason, may be provided (to the extent reasonably available) with a reasonable, non-stigmatizing alternative changing area (for example, a nearby restroom stall with a door, an area separated by a curtain, a physical education teacher's office in the locker room, or a nearby single-access restroom) or provided with an alternative changing schedule. Any alternative arrangement should be provided in a way that gives adequate consideration to relevant privacy concerns.

(4) These guidelines related to restrooms and changing areas generally assume that a student has a special concern or is in some way uncomfortable with consistently using the facilities that correspond to the biological sex that the student was assigned at birth. However, all students have the option of consistently accessing the facilities that correspond to the biological sex that the student was assigned at birth. Accordingly, the Department's willingness to address individualized concerns and requests that relate to restroom and changing area access does not mean that any student is required to establish an individualized arrangement or plan with the school.

5. Physical Education Classes and Intramural/Interscholastic Athletics

All students shall be permitted to participate in physical education classes and intramural sports in a manner consistent with their gender identity. Regarding interscholastic sports teams, the Department will follow the Rhode Island Interscholastic League's (RIIL) rules pertaining to participation consistent with gender identity. Article 1, Section 22 of the RIIL Rules and Regulations states that all students should have the opportunity to participate in RIIL activities in a manner consistent with their gender identity, and provides a framework for gender identity eligibility appeals.

Specifically, Article 1, Section 22 of the RIIL Rules and Regulations states:

All students should have the opportunity to participate in RIIL activities in a manner that is consistent with their gender identity, irrespective of the gender listed on a student's records. Once the student has been granted eligibility to participate in the sport consistent with his/her gender identity, the eligibility is granted for the duration of the student's participation and does not need to be renewed every sports season or school year. All discussion and documentation will be kept confidential, and the proceedings will be sealed unless the student and family (if family is involved) make a specific request.

6. Dress Codes

Schools may enforce dress codes pursuant to school/Department policy. However, any dress code or uniform policy shall be gender-neutral. Students have the right to dress in accordance with their gender identity, within the parameters of the dress code. School staff cannot enforce a dress code more strictly against transgender or gender non-conforming students than other students. Dress codes should be general statements that ensure the proper dress for all students. The colors of caps and gowns worn by students at graduation ceremonies shall not be differentiated based on gender. To the extent any school-sponsored event or extracurricular activity requires gender-specific dress or clothing (for example, the school band or chorus) students are entitled to dress in accordance with their gender identity.

7. Other Gender-Based Activities, Rules, Policies and Practices

The Department will evaluate all gender-based activities, rules, policies, and practices—including but not limited to classroom activities, school ceremonies, field trips, and school photos—and maintain only those that have a clear and sound pedagogical purpose. Students shall be permitted to participate in any such activities or conform to any such rule, policy, or practice consistent with their gender identity.

8. Student Transitions

(1) Each school shall accept the gender identity that each student asserts. There is no medical or mental health diagnosis or treatment threshold that students must meet in order to have their gender identity recognized and respected. The assertion may be evidenced by an expressed desire to be consistently recognized according to their gender identity. Students ready to socially transition may initiate a process to change their name, pronoun, attire, and access to preferred programs, activities, and facilities consistent with their gender identity. Each student has a unique process for transitioning. The school shall customize support to optimize each student's equal access to the Department's educational programs and activities. Generally, notifying a student's parent/guardian about their gender identity, expression, or transition, is unnecessary. In some cases, notifying parents/guardians carries risks for the student, such as family rejection or physical abuse. Prior to notification of any parent/guardian regarding the transition process, school staff should work closely with the student to assess the degree to which, if any, the parent/guardian will be involved in the process and must consider the health, well-being, and safety of the transitioning student.

(2) Upon notification by a student, parent/guardian, or representative that a student is undertaking, planning to undergo, or has completed a gender transition, the school will promptly inform the notifying individual and the student of the right to request a support team, consisting of appropriate

school staff such as the school principal or designee, counselor, social worker and teacher(s), and members of the school point team. When a student transitions during the school year, the school team shall hold a meeting with the student and parents/guardians, if they are involved in the process, to ascertain their desires and concerns. The school team should discuss a timeline for implementing the student's transition plan in order to create conditions that support a safe and accepting environment at the school. Finally, Department staff shall train school administrators and any educators who interact daily with the student on the transition plan, timelines for transitions, and any relevant legal requirements.

9. Staff Training and Professional Development

The Department, through the Human Resources Director or the Director's designee, shall implement ongoing, mandatory training and professional development for all staff members regarding their responsibilities under this policy. Information regarding this policy shall be incorporated into training for new school employees. The content of such professional development shall include but not be limited to:

- Terms, concepts, and current developmental understandings of gender identity, gender expression, and gender diversity in children and adolescents.
- Developmentally appropriate strategies for communication with students and parents/guardians (if family is involved) about issues related to gender identity and gender expression that protect student privacy.
- Developmentally appropriate strategies for preventing and intervening in bullying, harassment, and discrimination incidents, including cyber bullying, involving gender identity or expression.
- Experiences of transgender and other gender nonconforming students.
- Gender-neutral language and practices.
- Data regarding risks for transgender and gender nonconforming students, and the positive impact of nondiscrimination policies on school climate.

10. Transgender Student Point Teams

Each school shall form a point team, led by the school nurse, that will serve as a visible resource for all students who have questions and concerns regarding any issues related to gender identity and expression. The point team shall also be a resource for any questions regarding the Transgender Students policy. The point team will receive specialized training in the policy and resources available. In addition to the school nurse, the point team should be comprised of individuals throughout different areas of the school community, including but not limited to: teachers, administrators, social workers, counselors, parent advocates, security, health and physical education staff, or other support staff.

11. Publication and Media Communications

This Policy shall be made available on the Department's website. A summary of the policy shall be included in the Code of Student Conduct. The Department and individual schools shall make

consistent efforts to ensure the visibility and accessibility of this policy for students, parents, and staff.

Only the Superintendent, Assistant Superintendent, Special Education Director, or their designee shall communicate to representatives of the media regarding matters of student gender identity or expression. Department staff shall direct the media to the Superintendent or designee. In communicating with the news media, parents/guardians and the community, protecting the privacy of transgender students shall be the top priority for the spokesperson and staff.

Legal Reference

20 U.S.C. §§ 1681–1688; 34 C.F.R. Pt. 106; 28 C.F.R. Pt. 54 (Title IX of the Education Amendments of 1972 and implementing regulations);

20 U.S.C. § 1232g; 34 C.F.R. Part 99 (Family Educational Rights and Privacy Act- FERPA); RIGL § 16-21-33 (Safe Schools Act);

RIGL §5-37.3-1 et seq. (Confidentiality of Health Care Information Act);

RIGL § 11-24-3 (Full and equal accommodations-nondiscrimination).

1st Passage approved by WSC on: 05-08-2019
2nd Passage approved by WSC on: 05-22-2019

Gender Support Plan

STUDENT INFORMATION		
Student Legal Name	Student Preferred Name	
Date of Birth	Grade	School
Sex Assigned at Birth <input type="checkbox"/> Male <input type="checkbox"/> Female	Gender Expression	Gender Identity <input type="checkbox"/> Male <input type="checkbox"/> Female
Address	City	Zip Code
Parent/Guardian	Parent/Guardian	
Address:	Address:	
Phone:	Phone:	
PARENT/GUARDIAN INVOLVEMENT		
Are the parent(s)/Guardian(s) of this student aware of their child’s gender transition? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Are the parent(s)/Guardian(s) of this student supportive of their child’s gender transition? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Source of information _____		
If no to either question, what considerations/limitations must be accounted for in implementation of this plan? (Note: Please see accompanying implementation guidelines for completing this section.)		
MEETING INFORMATION		
Date of Meeting	Location	
Participants		
Parent/Guardian	Parent/Guardian	
Student	Staff Advocate	
Other (Name and Role)	Other (Name and Role)	
Other (Name and Role)	Other (Name and Role)	
CONFIDENTIALITY AND PRIVACY		
How public or private will information about this student’s gender be (check all that apply)?		
<input type="checkbox"/> District staff will be aware: <input type="checkbox"/> District Administrator <input type="checkbox"/> Student Services <input type="checkbox"/> Instructional Equity <input type="checkbox"/> Registrar		
<input type="checkbox"/> Site level leadership/administration will know <input type="checkbox"/> Principal &/or Associate Principal <input type="checkbox"/> Counselor <input type="checkbox"/> School Psychologist <input type="checkbox"/> Nurse <input type="checkbox"/> Social Worker <input type="checkbox"/> Other(s) _____		
<input type="checkbox"/> Teachers and/or other school staff will know Specify the adult staff members: _____		
<input type="checkbox"/> Student will not be openly “out,” but some students are aware of the student’s gender Specify the students: _____		
<input type="checkbox"/> Student is open with others (adults and peers) about gender		
<input type="checkbox"/> Other – describe: _____		
In the case of substitute teachers, what relevant information will be disclosed?		

If the student has asserted a degree of privacy, what steps will be taken if that privacy is compromised, or is believed to have been compromised?

How will a teacher/staff member respond to any questions about the student's gender from:
Other students:
Staff members:
Other parents/community:

What training or professional development needs exist for staff or students regarding this student's transition or gender status?

STUDENT RECORDS AND RELEASE OF INFORMATION

Name in Student Information System Gender Identification: Male
 Female

Student's preferred name: Preferred pronouns:

Preferred name agreed to as the primary name in the Student Information System: Yes No
If yes, Student Information System will be updated to reflect choice.

Name to be listed on school ID:

Adjustments for privacy considerations:

Name to be used in unofficial records or information releases such as newspaper or newsletters, school communication, activity participation, etc.:

Name to be used in conjunction with school publications, school photos, programs, and announcements:

Agreements regarding communication prior to release:
Note: There are some restrictions regarding this. Please see accompanying implementation guidelines for completing this section.

NAME AND PRONOUNS USAGE BY STAFF AND STUDENTS

Process to follow when incorrect names are used by staff:

Process to follow when incorrect names or pronouns are used by students:

STUDENT SAFETY

Key Safe Adult(s) in the school

What are the signs that the student is feeling unsafe? How will the student signal they are feeling unsafe?

Process when feeling unsafe

Process for addressing bullying or harassment

USE OF FACILITIES

Restrooms and Locker Rooms:
Student will use the following restroom(s) on campus
Student will change clothes in the following place(s)
Contact person for questions/concerns about facilities:

Field Trips:
Use of facilities for any class trips:

Are there overnight field trips anticipated for this school year? Yes No
 Room accommodations for overnight trips:
 Other considerations for overnight trips:

EXTRACURRICULAR SPORTS AND ACTIVITIES/AFTERSCHOOL ACTIVITIES

What extracurricular or afterschool activities is the student considering?
 What considerations/accommodations need to be made to support participation?

What athletic activities might the student participate in?
 What considerations/accommodations need to be made to support participation?
 Is the activity a RIIL sponsored activity? Yes No
 What RIIL rules or guidelines must be considered?

STUDENT SOCIAL/EMOTIONAL HEALTH

Support Service	Type of Service	Frequency/Duration of Service
<input type="checkbox"/> School Counseling		
<input type="checkbox"/> School Social Work		
<input type="checkbox"/> School Psychologist		
<input type="checkbox"/> School Nurse		

As a team, rate the student's present level of distress: 1 2 3 4 5
 See procedural manual for explanations of levels

Are there social/emotional health needs that may impact attendance? Yes No
 How will attendance issues be addressed:

STUDENT IN MEDICAL TRANSITION

Student is undergoing medical transitioning: Yes No Date transitioning began: _____
 Important medical considerations:

Medical Release on File: Yes No

Medical Contact Information

Name	Phone

Communication and Privacy Plan

Supporting medical needs at school:
 Will there be or are there attendance considerations due to the medical transition?
 How will attendance issues be addressed?

Concerns of student and family regarding transition and school:

ACTION PLAN AND FOLLOW-UP ITEMS

Action Item	Who is responsible?	Timeframe

PLAN REVIEW AND MONITORING

Key Contact Staff Member: _____
Date/Time of next meeting or check-in _____ Location _____
Process to Reconvene (student, parent/guardian, and/or staff may request):
Confirmation of Agreement to Plan:
Signature of Parent/Guardian _____ Date _____
Signature of Parent/Guardian _____ Date _____
Signature of Student (if appropriate) _____ Date _____
Site administrator _____ Date _____

Gender Support Plan: Documentation Assistance

The purpose of this document is to create shared understandings about the ways in which the student’s authentic gender will be accounted for and supported at school. **Due to the nature and scope of the information collected, it is advised that school personnel provide this to the student (and, if family is involved, the student’s parent and/or guardian) in advance of the meeting.**

Students (and if family is involved, the student’s parent and/or guardian) ultimately determine what information will be shared with the school. This in turn advises the school on how to best accommodate the student’s needs and interests. School staff, caregivers and the student should work together to arrive at agreements regarding accessibility, supports and accommodations.

SECTION ONE: STUDENT INFORMATION

STUDENT INFORMATION			
Student Legal Name		Student Preferred Name	
Student ID	Date of Birth	Grade	School
Sex Assigned at Birth <input type="checkbox"/> Male <input type="checkbox"/> Female	Gender Expression		Gender Identity
Address		City	Zip Code
Parent/Guardian		Parent/Guardian	
Address:		Address:	
Phone:		Phone:	

This section of the plan addresses key identifying and contact information.

Legal and Preferred Name

1. Student Legal Name is the name currently in the Student Information System or the student’s birth certificate.
2. Student Preferred Name is the name the student wishes to go by. Please include first and last name. Ensure that the spelling is correct. Note: it is not uncommon for students in transition to have changes to the preferred name. When the student indicates a need to change the name, this is an opportunity to meet as a team and review the plan.

Sex at Birth/Gender Expression/Gender Identity

Students (and, if appropriate, the parent and/or guardian) may identify the sex assigned at birth, gender expression, and gender identity. Any or all of these may remain blank. Explain the purpose for requesting this information, noting it assists the school in discussions regarding privacy, facility usage and other matters.

1. Sex Assigned at Birth refers to the sex that was identified at birth. This is typically on the student’s birth certificate.
2. Gender expression refers to the manner in which a person represents or expresses gender to others, often through behavior, clothing, hairstyles, activities, voice, or mannerisms. Students may wish to disclose this or not. Asking assists in determining needed supports or accommodations for the student.

3. Gender identity refers to a person’s deeply held sense or psychological knowledge of their own gender, which can include being female, male, another gender, gender fluid, or no gender. This may also be left blank if the student chooses not to disclose this information.

Parent/Guardian Information (if family is involved)

Enter parent/guardian information for each contact within the student information system. As with any other communication, ensure that all parent(s)/guardian(s) are aware of the meeting to develop the Gender Support Plan. If for any reason a parent/guardian is not included, carefully review Section Two input.

SECTION TWO: PARENT/GUARDIAN INVOLVEMENT

PARENT/GUARDIAN INVOLVEMENT	
Are the parent(s)/guardian(s) of this student aware of their child’s gender transition?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the parent(s)/guardian(s) of this student supportive of their child’s gender transition?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Source of information _____	
If no to either question, what considerations/limitations must be accounted for in implementation of this plan? <i>(Note: Please see accompanying implementation guidelines for completing this section.)</i>	

This section provides critical information related to the role of parents/guardians. Parents and guardians of transgender and gender nonconforming students play a critical role in development of safe and supportive environments for their children. However, some students may not be able or willing to share information with their parent(s)/guardians. If that is the case, students need to know the limitations on the school and district if this information cannot be disclosed to the student’s family. Carefully consider the following questions. These situations must be addressed on a case-by-case basis and require schools to balance the goal of supporting the student with the benefits of keeping parents informed about their children.

Answer both questions regarding parent/guardian involvement.

If the answer to either question is NO, the student must be made aware of the limitations with respect to publications, official or unofficial district communication, and releases of information to newspapers or other parties requesting directory data. The student will be informed that a goal of this plan might include moving towards working with the parents/guardians as partners in the support plan. If they are not to be currently included, note the steps that can facilitate this.

If one parent is not aware or not supportive, the same considerations in the section above apply. Additionally, discuss the following:

1. If this is a two-household family, how will communication with the other household occur?
2. Are there legal considerations regarding the rights of either parent? If there is a question regarding legal rights of the parent or guardian, please collect any legal documents so those can be reviewed by the Human Resources Director or the Director’s designee.

If there is any question regarding the rights or parent(s)/guardian(s), or the responsibility of the District to communicate with parent(s)/guardian(s), please contact the Director of Human Resources or the Director’s designee, for consult.

SECTION THREE: MEETING INFORMATION

MEETING INFORMATION	
Date of Meeting	Location
Participants	
Parent/Guardian	Parent/Guardian
Student	Staff Advocate
Administrator (Name and Position)	Other (Name and Role)
Other (Name and Role)	Other (Name and Role)

Prior to the meeting, discuss with the student who might attend this meeting. It is important for the student to have advocates at the meeting due to the nature of the information discussed. An administrator should always be present due to aid in implementation of the plan and ensuring fidelity to the plan. Other participants may include activity advisors or athletic coaches, physical education teachers, and outside professionals working with the student and family.

SECTION FOUR: CONFIDENTIALITY AND PRIVACY

CONFIDENTIALITY AND PRIVACY
<p>How public or private will information about this student’s gender be (check all that apply)?</p> <p><input type="checkbox"/> District staff will be aware: <input type="checkbox"/> District Administrator <input type="checkbox"/> Guidance <input type="checkbox"/> Registrar</p> <p><input type="checkbox"/> Site level leadership/administration will know <input type="checkbox"/> Principal &/or Associate Principal <input type="checkbox"/> Counselor <input type="checkbox"/> School Psychologist <input type="checkbox"/> Nurse <input type="checkbox"/> Social Worker <input type="checkbox"/> Other(s) _____</p> <p><input type="checkbox"/> Teachers and/or other school staff will know Specify the staff members: _____</p> <p><input type="checkbox"/> Student will not be openly “out,” but some students are aware of the student’s gender Specify the students: _____</p> <p><input type="checkbox"/> Student is open with others (adults and peers) about gender</p> <p><input type="checkbox"/> Other – describe: _____</p> <p>In the case of substitute teachers, what relevant information will be disclosed? What is the process for ensuring that information is shared?</p> <p>For visitors or volunteers at the school, what relevant information will be disclosed? Under what conditions would this information be released?</p> <p>If the student has asserted a degree of privacy, what steps will be taken if that privacy is compromised, or is believed to have been compromised?</p>
<p>How will a teacher/staff member respond to any questions about the student’s gender from:</p> <p>Other students:</p> <p>Staff members:</p> <p>Other parents/community:</p>

What training or professional development needs exist for staff or students regarding this student's transition or gender status?

All persons, including students, have a right to privacy, and this includes the right to keep one's transgender status private at school. Information about a student's transgender status, legal name, or gender assigned at birth constitutes confidential personally identifiable and medical information.

Disclosing this information to other students or parents or other third parties may violate privacy laws, such as the federal Family Educational Rights and Privacy Act (FERPA), as well as constitutional privacy protections.

Substitute staff should, generally, be informed of a student's preferred name and pronouns. However, substitute staff may present unique challenges for the student. Questions to consider include:

1. What are the circumstances that guide whether information is needed to be shared?
2. What information will be disclosed?
3. Who will be responsible for ensuring the information is shared?

Volunteers or visitors present in a classroom should not be informed of the student's preferred name and pronouns, or any other confidential student information.

Additionally, disclosure or misuse of this information may establish a hostile environment for a transgender or gender nonconforming student, potentially subjecting them to bullying and harassment, by peers, discrimination by school staff, or family rejection. Key questions to consider in responding to the question include:

1. What should the student do if they feel their privacy has been compromised?
2. What should staff who believe the student's privacy has been violated do to report this concern?

Discuss how staff will respond to questions regarding the student's gender from staff, other students, and the community. Sharing of information outside these parameters would be a violation of the Family Educational Rights and Privacy Act. Carefully delineate the student's interests with respect to each party.

Any written correspondence regarding a student should originate from the student, and if family is involved, the student's parent and/or guardian. Carefully consider confidentiality and privacy needs of the student and any negative ramifications this communication may have on the student. If there are any questions, please submit the correspondence to the Director of Human Resources, or the Director's designee, for review and guidance.

SECTION FIVE: STUDENT RECORDS AND RELEASE OF INFORMATION

Every student has the right to be addressed by a name and pronouns that correspond to the student’s gender identity. Regardless of whether a transgender or gender nonconforming student has legally changed their name or gender, schools will allow such students to use a chosen name and gender pronouns that reflect their identity. It is recommended that school staff privately ask students who are transgender or gender nonconforming how they want to be addressed in class and in the school’s communication with the student’s parents or guardians. Some transgender and gender nonconforming youth may feel most comfortable being addressed by gender-neutral pronouns such as “they” or “ze” or just referred to by their names (without pronouns).

STUDENT RECORDS AND RELEASE OF INFORMATION	
Name in Student Information System	Gender Identification: <input type="checkbox"/> Male <input type="checkbox"/> Female
Student’s preferred name:	Preferred pronouns:
Preferred name agreed to be listed in the Student Information System: <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, Student Information System will be updated to reflect choice.</i>	
Name to be listed on school ID:	
Adjustments for privacy considerations:	
Name to be used in unofficial records or information releases such as newspaper or newsletters, school communication, activity participation, etc.:	
Name to be used in conjunction with school publications, yearbook, school photos, programs, and announcements:	
Agreements regarding communication prior to release: <i>Note: There are some restrictions regarding this. Please see accompanying implementation guidelines for completing this section.</i>	

To ensure consistency among administrators and staff, every effort will be made to update student education records (such as attendance reports, class rosters for substitutes, school IDs, transcripts, electronic records, etc.) with the student’s chosen name and appropriate gender markers.

Preferred gender pronouns are those a person prefers to have used when referred to in conversation (i.e., a person with a traditionally male gender identity likely prefers he, him, and his). Please note that young people may choose to go by they, ze, or no pronouns.

Permanent school records must be maintained under the student’s legal name. School staff or administrators will avoid the inadvertent disclosure of such confidential information. If there is a legal name change, the registrar should be provided a record of the change and the student information system will be updated accordingly.

Carefully consider the public nature of the various records or publications when determining the name to be utilized. Students may be sacrificing a degree of privacy with utilization of a preferred name or pronoun in these publications.

When communicating to the media or community about issues related to gender identity or expression, staff and schools should refer them to the District Public Information Officer or Superintendent. Protecting the privacy of transgender and gender nonconforming students must be a top priority for the District, and all personally identifiable and medical information must be kept strictly confidential, in accordance with local, state, and federal privacy laws.

SECTION SIX: NAME AND PRONOUNS USAGE BY STAFF AND STUDENTS

Wherever arbitrary gender dividers can be avoided, they should be eliminated. For example, when dividing the class into two lines based on male and female, perhaps the students could be divided by the first letters of their last names, type of shoe, color clothing, etc. Lunch divisions can be handled similarly, by dividing the students in half by last name as opposed to gender. Simple things, such as calling students “students” or “scholars” instead of “boys and girls,” may seem insignificant but actually make a notable difference to students who feel alienated because they may not identify as being part of either of the two binary categories.

This section addresses concerns the student may have when referenced by names or pronouns inconsistent with those identified in this plan.

NAME AND PRONOUNS USAGE BY STAFF AND STUDENTS
Process to follow when incorrect names are used by staff:
Process to follow when incorrect names or pronouns are used by students:

When a student has previously been known at school by a different name, errors in name or pronoun usage may happen. When reported, the school administration will direct school personnel to use the student’s chosen name and appropriate pronouns.

Refusal to use a student’s preferred name or pronoun does not demonstrate respect for the student and their identity. Administration may direct specific sensitivity training for persistent refusal to respect a student’s preferred name or pronoun.

SECTION SEVEN: STUDENT SAFETY

Many students who are transgender or gender-nonconforming are afraid to be themselves and sometimes will never publicly be the people that they really are to avoid potential ridicule or because of fears for their personal safety. When transgender students feel safe to be themselves they are more successful both in and out of the classroom.

This section outlines safety concerns, safe resources or spaces, and how bullying and harassment will be addressed.

STUDENT SAFETY
Key Safe Adult(s) in the school
What are the signs that the student is feeling unsafe? How will the student signal they are feeling unsafe?

Process when feeling unsafe
Process for addressing bullying or harassment

The school nurse initially and by default shall be the key contact at school for students who are transgender or gender-nonconforming.

Reports of harassment and bullying will be documented in the student information system. It is the building administrator’s responsibility to investigate and resolve issues of bullying and harassment. Additionally, concerns related to harassment and bullying can be made to the Human Resources Director or the Director’s designee.

SECTION EIGHT: USE OF FACILITIES

Safe use of bathrooms and locker rooms in schools and colleges is essential for any student—particularly transgender students, who can face unique challenges. Like everyone else, transgender students deserve to use bathrooms and locker room facilities with assurances for their safety and dignity.

USE OF FACILITIES
<p><u>Restrooms and Locker Rooms:</u> Student will use the following restroom(s) on campus Student will change clothes in the following place(s) Contact person for questions/concerns about facilities:</p>
<p><u>Field Trips:</u> Use of facilities for any class trips: Are there overnight field trips anticipated for this school year? <input type="checkbox"/>Yes <input type="checkbox"/>No Room accommodations for overnight trips: Other considerations for overnight trips:</p>

Bathrooms

Having safe access to restroom facilities is important to the health and wellbeing of all people, including those who identify as transgender and gender-nonconforming. Unfortunately, for people who are transgender or gender-nonconforming, the bathroom can represent a space that is not safe.

Students are allowed to use the same bathrooms as their peers, unless they request alternate accommodations. This means that transgender and gender-nonconforming students are entitled to use the bathroom that matches their gender identity. Any student, transgender or otherwise, who has a need or desire for increased privacy, regardless of underlying reasons, also has the right to access a single-user restroom, such as a staff bathroom or the bathroom in the nurse’s office. However, the single-user bathroom may not be given as the only option for transgender or gender-nonconforming students.

Locker Rooms

The issue of locker room usage is a sensitive one for many people. In addressing locker room usage, staff must focus first on the rights of the student, and then on the student’s individual needs. Locker rooms have historically presented significant challenges for individuals who are transgender and gender-nonconforming, both physically and emotionally. Staff should prepare for individual student meetings by reviewing the facilities and generating a list of all available options for facility usage.

Schools may maintain separate locker room facilities for male and female students. However, all students must have access to the locker room facility that corresponds to their gender identity. If there is a request for increased privacy, any student must be offered access to reasonable accommodations, such as:

- Full access to the locker room the student selects
- Private changing areas within gender-specific locker rooms.
- Unisex changing areas
- Staff changing areas
- Schedules for changing that may include allowing the student access prior to or after other students

Ultimately, if a student expresses discomfort to any member of the school staff, that staff member should review these options with the student. Building administration may also consult with the Human Resources Director or the Director’s designee to evaluate available options.

Field Trips

As a general rule, students should be permitted to participate in accordance with their gender identity consistently asserted at school. The student would use facilities consistent with those generally used at school.

Consider parent or other volunteers that may be accompanying the group on the field trip. What specific information will be shared, if any, with these individuals?

Consider what activities may involve the need for accommodations to address student privacy concerns. Requests for alternative sleeping arrangements should be honored if in accordance with the student’s desires.

SECTION NINE: EXTRACURRICULAR SPORTS AND ACTIVITIES

Activities and sports offer all students opportunities for engagement, inclusion, and contribute to overall health and wellness. In general, the student should be able to participate in extracurricular sports or afterschool activities in the same manner as any other student. Students should be able to participate in activities in accordance with their gender identity. Interscholastic athletics may require additional considerations.

EXTRACURRICULAR SPORTS AND ACTIVITIES/AFTERSCHOOL ACTIVITIES
What extracurricular or afterschool activities is the student considering?
What considerations/accommodations need to be made to support participation?
What athletic activities might the student participate in?
What considerations/accommodations need to be made to support participation?
Is the activity a RIIL sponsored activity? <input type="checkbox"/> Yes <input type="checkbox"/> No
What RIIL rules or guidelines must be considered?

Consider the following when completing the first section:

1. What, if any, activities is the student considering?
2. Who are the supervisors or coaches for those activities?
3. What information will be shared with those individuals?

4. What accommodations are needed? Facility usage, uniforms, support for successful inclusion, etc.

Intramural sports should include the same considerations as those for afterschool activities. Eligibility under RIIIL regulations requires special considerations. The RIIIL Transgender Participation Policy can be found in Appendix A. If there are questions regarding application of that policy, the team should refer questions to the school's athletic director or the Human Resources Director or the Director's designee.

SECTION TEN: STUDENT SOCIAL/EMOTIONAL/PHYSICAL HEALTH AT SCHOOL

A variety of student services personnel is available to provide support for the student at school. These services can include providing support for strategies to deal with peers, teachers, and accessibility issues at school. They can also assist in connecting the student and family (if family is involved) to community resources. Lastly, they can also assist with physical well-being at school. These specialized student services personnel are competent to provide support and services to any student who has questions related to gender identity.

STUDENT SOCIAL/EMOTIONAL HEALTH		
As a team, rate the student's present level of distress: 1 2 3 4 5		
See procedural manual for explanations of levels		
Are there social/emotional health needs that may impact attendance? <input type="checkbox"/> Yes <input type="checkbox"/> No		
How will attendance issues be addressed:		
Support Service	Type of Service	Frequency/Duration of Service
<input type="checkbox"/> School Counseling		
<input type="checkbox"/> School Social Work		
<input type="checkbox"/> School Psychologist		
<input type="checkbox"/> School Nurse		

To ensure awareness of the level of need the student may have, use the above scale to assist the student in identifying the current level of distress within the school setting, or in general. Use the following scale;

- 1 = Generally does not experience distress.
- 2 = Experiencing some distress. This may be situational or low-level.
- 3 = Moderate level of distress. Situations or individuals are routinely resulting in distress for the student.
- 4 = Significant level of distress. Particular sources of distress cannot be pinpointed. There is regular distress within the school environment.
- 5 = Severe distress. Significant assistance is routinely needed to get through the school day.

Students who are transgender or gender-nonconforming may have medical or social/emotional needs that are to be addressed outside of school. Discuss these needs and how the attendance issues will be addressed and what agreements are made related to absences and documentation of them.

In this section, also consider the unique needs of the student and if those needs should be addressed by Student Services personnel. Indicate what the service is to consist of, as well as the frequency and duration of the services.

SECTION ELEVEN: STUDENT IN MEDICAL TRANSITION

Special care is required in handling medical information related to students in transition. Higher standards must be met. The District must ensure that all medical information relating to transgender and gender-nonconforming students is kept confidential in accordance with the Health Insurance Portability and Accountability Act (HIPPA). School staff may not disclose information that may reveal a student’s transgender status or transition process to others, including other school staff, unless legally required to do so (e.g., such information is contained in an educational record under FERPA), or unless the student has authorized such disclosure.

STUDENT IN MEDICAL TRANSITION	
Student is undergoing medical transitioning: <input type="checkbox"/> Yes <input type="checkbox"/> No Date transitioning began: _____	
Important medical considerations:	
Medical Release on File: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Medical Contact Information	
Name	Phone
Communication and Privacy Plan	
Supporting medical needs at school:	
Will there be or are there attendance considerations due to the medical transition? How will attendance issues be addressed?	
Concerns of student and family regarding transition and school:	

Complete this section if relevant and student, parent(s) and/or guardian(s) agrees to share medical information. If possible, obtain a Release of Information for medical personnel working with the student. Students undergoing medical transition may have appointments or experience health side effects. These may impact the student’s attendance. Consider having the parents obtain a medical note related to appointments and health concerns.

SECTION TWELVE: ACTION PLAN AND FOLLOW-UP ITEMS

ACTION PLAN AND FOLLOW-UP ITEMS		
Action Item	Who is responsible?	Timeframe

This section is to review specific steps that must take place to implement this plan. Carefully note who is responsible for the action item and the date this must be completed by.

SECTION THIRTEEN: PLAN REVIEW AND MONITORING

PLAN REVIEW AND MONITORING	
Key Contact Staff Member: _____	
Date/Time of next meeting or check-in _____	Location _____
Process to Reconvene (student, parent/guardian (if family involved), and/or staff may request): _____	
Confirmation of Agreement to Plan:	
Signature of Parent/Guardian (if appropriate) _____	Date _____
Signature of Parent/Guardian (if appropriate) _____	Date _____
Signature of Student _____	Date _____
Site administrator _____	Date _____

This section provides information related to agreements on coordination of the plan and the conditions triggering a reconvening of the team to review this plan. A key contact from the school MUST be identified. Signing the section for Confirmation of Agreement to Plan indicates the plan has been finalized, all topics discussed, and supports delineated in the plan are agreed to. The student MUST sign that they are in agreement with this plan for the plan to be implemented. Parent(s)/guardian(s), if involved with plan development, are also required to sign.

1st Passage approved by WSC on: 05-08-2019
 2nd Passage approved by WSC on: 05-22-2019