



ANKENY COMMUNITY SCHOOL DISTRICT

*Ankeny Community Schools is unified in its commitment, passion, and vision
so every learner is prepared to achieve a lifetime of personal success.*

Policy Committee Meeting

MINUTES

Northview Middle School, 1302 N Ankeny Blvd, Conference Room 1900,

Door W22

March 31, 2022

4:30 PM

Please turn off cellular phone during the meeting. Thank you.

- **Welcome**

Attendees:

Jessica Dirks

Sarah Barthole

Lori Lovstad

Katie Claeys

Darin Haack

Jennifer Jamison

Emily Archer

Ashley Rullestad

Heather Stephenson

- **Approval of Minutes:**

1. **Policy Committee Meeting Minutes - February 2022**

- **Updates:**

1. **Proposed Policy Updates**

- 501.07 Student Transfers Out or Withdrawals - *Updating to align with the streamlining of other enrollment-related policies included herein*
- 501.31 Open Enrollment Transfers into the District - *Consolidation and streamlining into 501.31 Open Enrollment to ensure clarity and consistency with current practice*
- 501.32 Open Enrollment Transfers Out of the District - *Consolidation and streamlining into 501.31 Open Enrollment to ensure clarity and consistency with current practice*

- 501.06 Student Transfers In - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 501.15 Student of Legal Age - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 501.20 Entrance Requirements - Evidence of Age - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 501.30 School Attendance Areas - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 501.33 Student Building Assignments - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 501.35 Intra -District Open Enrollment - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 501.50 Resident Students - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 501.60 Non-Resident Students - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 505.09 Enrollment - *Consolidation and streamlining into 501.05 Enrollment & Attendance Center Assignment to ensure clarity and consistency with current practice*
- 802.55 Post-Issuance Compliance Regulation - *Updated to align with legal requirements*
- 802.56 Bond Disclosure Policy - *NEW Policy to align with legal requirements*

- **Additional Items:**

- **Adjournment**

Future Meetings Dates:

1. Future Meeting Dates

- April 21, 2022
- May 19, 2022



ANKENY COMMUNITY SCHOOL DISTRICT

Item Cover Sheet

Title: Policy Committee Meeting Minutes - February 2022

ATTACHMENTS:

File Name	Description	Type	Upload Date
Policy Committee Minutes 2.17.22.pdf	Policy Committee Minutes 2.17.22	Support Document	3/28/2022



ANKENY COMMUNITY SCHOOL DISTRICT

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**Policy Committee Meeting
MINUTES
Northview Middle School, 1302 N Ankeny Blvd
February 17, 2022
4:30 PM**

Please turn off cellular phone during the meeting. Thank you.

- **Welcome**

Attendees:

Jessica Dirks

Lori Lovstad

Lori SchraderBachar

Heather Stephenson

Jenny Wirtz

Katy Kauffman

Jen Lindaman

Jodie Graham

Ashley Rullestad

Darin Haack

Emily Archer

Sarah Barthole

- **Minutes**

1. **Policy Committee Meeting Minutes - January 2021**

- The January 20, 2022 Policy Committee minutes were approved.

- **Updates**

1. **Proposed Policy Updates**

- 405.3 Resignations - Classified - *Five-year review: changes for clarity & consistency; amendment to meet demands of labor market*
- 1001.60 Examination of District Public Records - *Five-year review: changes for clarity & consistency*

- 602.02 Instructional Practices - *Five-year review: changes for clarity, consistency, & alignment with current practices*
- 1001.10 Board Communications - *Five-year review: changes for clarity & consistency*
- 1004.70 Online Fundraising Campaigns - Crowdfunding - *Five-year review: changes for clarity & consistency*
- 604.05 Religion-Based Excuse from District Program - *Five-year review: changes for clarity & consistency*
- 802.55 Post-Issuance Compliance Regulations for Tax-Exempt Obligations -*Five-year review: changes for clarity & consistency*
- 803.51 Construction Change Orders -*Five-year review: changes for clarity & consistency*
- 804.65 Governmental Accounting Practices and Regulations - Statement 54 -*Five-year review: changes for clarity & consistency*
- 102.00 Equal Educational Opportunity- *Annual review: changes for clarity & consistency; addition of language related to non-discrimination in federal Child Nutrition Program*
- 501.33 Student Building Assignments- *Changes for clarity, consistency, & alignment with current practices*

- **Discussion**

1. **Feedback on Instructional/ Library Materials Review Process, Continued**

- **Adjournment**

The Policy Committee adjourned at 5:32pm.

Future Meetings Dates

1. **Future Meeting Dates**

- March 31, 2022
- April 21, 2022
- May 19, 2022



ANKENY COMMUNITY SCHOOL DISTRICT

Item Cover Sheet

Title: Proposed Policy Updates

Extended Information:

- 501.07 Student Transfers Out or Withdrawals - *Updating to align with the streamlining of other enrollment-related policies included herein*
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File Name

Description

Type

Upload Date

[Proposed Policy Updates 3.31.22.pdf](#)

Proposed Policy Updates

Support Document

3/28/2022

[Enrollment and Attendance Policies Proposed Revisions 3.31.22.pdf](#)

Policy Revisions

Support Document

3/28/2022

SERIES 500
STUDENT PERSONNEL

501.07 Out-of-District Transfers and Withdrawals

A parent who wishes to withdraw or transfer their student from the district prior to the student's completion and/or graduation from the education program, shall notify the superintendent/designee of the intent to withdraw or transfer the student as soon as possible.

The parent shall present this notice, including the student's final day of attendance, at the student's attendance center. If the student is of compulsory education age and not transferring to another public school district or an accredited nonpublic school, the parents shall notify the superintendent/designee that the student is receiving private instruction. Upon parental request, the district shall forward the student's cumulative records to the receiving district. If the student is not enrolling in another district, the district will maintain the student's records in the same manner as the records of students who have graduated from the district.

Legal Reference:

20 U.S.C. § 1232g (2004).

Iowa Code §§ 274.1; 299.1-1A (2007).

Cross Reference:

501 Series: Student Attendance

506.01 Student Records Access

604.01 Competent Private Instruction

Reviewed:

May 11, 2009

June 17, 2013

May 21, 2018

March 31, 2022

Revised:

June 21, 2010

June 17, 2013

May 21, 2018

April 18, 2022

**SERIES 500
STUDENT PERSONNEL**

501.31 Open Enrollment

Open Enrollment into the District

The district will participate in open enrollment as a receiving district. As a receiving district, the board will allow nonresident students, who meet the legal requirements, to open enroll into the district. The district shall have complete discretion to determine the attendance center of a student attending the district under open enrollment.

Unless otherwise allowed by law, by June 1 in the year preceding the first year desired for open enrollment into the district the superintendent/designee shall bring to the board for action all timely-received open enrollment requests. A parent may request a waiver of the timeline above to open enroll into the district for “good cause,” as defined by Iowa Code and outlined in the Iowa Department of Education’s Open Enrollment Handbook provided the circumstance giving rise to the “good cause” occurred/began after March 1. The board shall consider requests for “good cause” open enrollment in alignment with the Iowa Department of Education’s Open Enrollment Handbook.

When deciding whether to approve a request to open enroll into the district, the district:

1. Shall determine if the requesting student has been suspended or expelled; if the student has, the board will deny the request to transfer until such time as the student has been reinstated in the sending district at which time the request will be considered similar to other requests.
2. Evaluate if sufficient classroom space and staffing as required by law and/or policy exists in the district to accept the student and deny a request to open enroll into the district if space is insufficient.
3. If sufficient space is available, give first priority to students who have other nuclear family members already enrolled in the district (“First Priority Students”). If one or more members of the same nuclear family submit requests for open enrollment for the same academic year and insufficient classroom space exists in one or more of the grades into which enrollment is requested, the board, in its discretion, may waive the criteria for insufficient classroom space or staff for those students affected in order to prevent the division of a nuclear family.
4. If space is still available after accommodating First Priority Students, the district may select additional students, except kindergartners, from those applications received by the first May board meeting. The district will consider other open enrollment requests in the order in which they are received. Provided, however, that kindergarten students shall not be considered until the first board meeting in July.

The district shall consider requests for special education students to open enroll into the district on a case-by-case basis, with the determining factors being whether the district’s special education program is appropriate for the student’s needs (as determined by the Director of Special Programs) and whether the student’s enrollment will cause class size to exceed the allowable maximum. The student shall remain in the sending district until the final determination is made. For student’s

requiring special education, the district will complete and provide to the resident district the documentation needed to seek Medicaid reimbursement for eligible services.

Requests for open enrollment into the district shall be granted for a minimum of one year unless the student will graduate, unless the family moves to another district within that period, and/or unless the board approves a different open enrollment term.

The superintendent/designee shall notify the sending district and petitioning parent of the board's approval or denial of the open enrollment request within five days of board action.

Once the request is approved, the student shall be considered enrolled and committed to attend the district with the commencement of the next academic year and succeeding years as prescribed by the Iowa Code. District policies applicable to students attending the district shall apply to students attending the district under open enrollment. The district may require the parent to complete additional paperwork and may, in its discretion, reassign the student's attendance center on a yearly basis.

Students in grades nine through twelve open enrolling into the school district will be eligible for participation in interscholastic athletics, at the varsity level, in accordance with applicable law. Reimbursement for transportation costs may be made available to qualifying parents/guardians.

Open Enrollment out of the District

Unless otherwise allowed by law, parents wishing to open enroll student(s) out of the district under the Open Enrollment Act shall notify the superintendent/designee of that intention by March 1 of the preceding school year (for rising 1st – 12th graders) and by September 1st of the current year (for kindergarteners). The formal notification shall state that the parent/guardian intends to enroll their student in a public school in another school district and shall describe the reason(s) for enrollment in the receiving district. The notification shall be made on form(s) prescribed by the Department of Education which are available on the district website and at the district office. A parent may request a waiver of the timeline above to open enroll out of the district for "good cause," as defined by Iowa Code and outlined in the Iowa Department of Education's Open Enrollment Handbook provided the circumstance giving rise to the "good cause" occurred/began after March 1.

The district shall consider requests for special education students to open enroll out of the district on a case-by-case basis to ensure that the receiving district is appropriate for the student's needs. The area education agency director of special education serving the receiving district will determine whether the receiving district's program is appropriate. The special education student will remain in the district until the final determination is made.

The superintendent/designee shall present all applications for open enrollment out of the district, including those filed after the March 1 deadline for "good cause", to the board for action in alignment with the Iowa Department of Education's Open Enrollment regulations. A student who is open enrolled may re-enroll in the district of residence at any time (unless under suspension or expulsion). The parent or guardian must notify the district of residence and the

receiving district in writing of the decision to enroll the pupil in the district of residence. A re-enrollment in the district of residence will terminate open enrollment.

The board will not approve a student's request to allow the receiving district to enter the district for the purposes of transportation.

Legal References:

Iowa Code §§139.9, 274.1, 279.11, 282.1, .3, .8, .18, 299.1, (1989)

470 Iowa Admin. Code 7

281 Iowa Admin. Code 11.3 (10)- (11), 11.4 (13).S.F. 2201

Cross References:

501.31 Approval of Open Enrollment Transfer In

606.06 Insufficient Classroom Space

Adopted:

August 7, 1989

Reviewed:

February 16, 2009

June 15, 2015

March 21, 2016

October 17, 2016

September 21, 2020

March 31, 2022

Revised:

February 16, 2009

June 15, 2015

March 21, 2016

October 17, 2016

September 21, 2020

April 18, 2022

**SERIES 500
STUDENT PERSONNEL**

501.05 ENROLLMENT & ATTENDANCE CENTER ASSIGNMENT

Enrollment

A student is enrolled in the district when the student is attending school consistent with the district attendance policies.

Subject to the exceptions outlined herein, secondary students must be enrolled in at least six (6) credits and Physical Education each semester. Exceptions to these course requirements may be available to accommodate alternative scheduling arrangements, at-risk programs, early graduation, and/or other circumstances approved by the principal/designee.

Enrollment Eligibility (Starting School and Transfers into the District)

Subject to the policies related to resident and non-resident students below, children will be allowed to enroll in the district's regular education program when they have reached the age of eligibility. An eligible child must be five (5) years of age on or before September 15 of the current year to participate in the district's kindergarten program; the child must be six (6) years of age on or before September 15 of the current year to begin first grade. The superintendent/designee shall determine what is satisfactory evidence for proof of age.

Students who have reached eighteen years of age and who are still eligible to attend an Iowa public school per Iowa law may, with or without declaring their residence independent of their parent(s) residence, attend school in the District without payment of tuition, subject to the requirements for residency outlined in this policy.

For students transferring to the district from another district, the superintendent/designee shall request cumulative records from the previous district. If the student does not offer proof of grade level from the previous district, the superintendent/designee shall make a grade level determination and may require testing and/or other information to make this determination.

The superintendent/designee shall determine the credits that may transfer to the district from the student's previous education elsewhere. If the student has not previously attended an accredited school, the superintendent/designee may accept and/or reject credits and/or grades.

Students expelled or suspended from their previous school district shall only be enrolled in the district after approval of the board.

Designated health and immunization certificates must be provided to the superintendent/designee prior to the first day of school or the district may deny admission to the student.

Resident Students

Children who are residents of the school district community will attend the school district without paying tuition.

To be considered a resident, the student must:

- Be physically present within the district's boundaries including at times other than when school is in session; and
- not have an established residence in another district by operation of law; and
- meet at least one of the following conditions:
 - Be in the district for the purpose of making a home and not solely for school purposes;
 - Meet the definition of a "homeless student" under state or federal law;

- Live in a juvenile detention center or a residential facility in the district.

A student may establish a dwelling with someone other than the parents and attend public school in the school district without paying tuition if the primary purpose for residing in the school district is not for the purpose of obtaining a free public education.

The mere existence of a guardian residing in the district does not establish residence for educational purposes. Open-enrollment students are not considered resident students for certified enrollment count.

Non-Resident Students

Students who are eligible to attend an Iowa public school but who are not resident students as described above are “non-resident students.” Non-resident students may enroll in the district at the discretion of the superintendent/designee upon application and payment of tuition if ineligible for open enrollment. The tuition rate for non-resident students shall be the current per-pupil cost of the school district as computed by the board secretary and as authorized by the Iowa Department of Education.

Non-resident students who are eligible to attend an Iowa public school and who have evidence that, in the district’s discretion, indicates they will become legal residents of the district by the enrollment certification date of the current school year may be allowed to attend school in the district without payment of tuition.

Students in grades eleven or twelve who are no longer residents of the district but who were resident students in the preceding school year may continue to attend school in the district without payment of tuition until they graduate. If these students are not of legal age, they shall be required to identify a place of residence and responsible adult in the district for purposes of administration. The superintendent/ designee may establish regulations for securing proof of this resident adult contact person.

Persons visiting the United States on a student visa do not meet the two basic criteria for tuition-free residence in Iowa’s public schools. They shall, therefore, pay tuition to attend school in the Ankeny Community School District. Exceptions are approved for foreign exchange students in keeping with district policy.

Subject to the exceptions set forth herein, resident students whose families move from district who wish to continue attending school in the district must complete an open enrollment application in keeping with law and policy.

Under certain conditions, students may be able to transfer between districts. These situations are determined individually by the Iowa Department of Education.

Determining Residency

Each case involving the bona fide residence of a student will be decided upon its individual merits by the superintendent/designee. Whenever a question of actual residence arises, the superintendent/ designee shall make a factual determination of the main reason for the student’s presence in the district, in keeping with Iowa Code and guidelines established by the Iowa Department of Education.

In the absence of information to the contrary, district officials may assume that students seeking enrollment are residents of the district unless application is made under open enrollment provisions.

The district need not challenge a legally-established guardianship. If the district received information that disputes the assumption of a student’s residence, the district may revise its determination of the student’s actual residence.

Attendance Center Assignment

The board shall have discretion to determine attendance center boundaries and to assign students to attendance centers. The board shall annually make available to the public a list of the District's attendance centers. The superintendent/designee shall make an annual recommendation to the board regarding each student's assigned attendance center.

Subject to the limitations outlined herein and/or elsewhere in law and/or policy, the superintendent/ designee shall have discretion to assign students to classrooms.

Parents of kindergarten through fifth grade siblings who are in the same grade may request the siblings be placed in the same or different classrooms. To be valid, the request must be written and submitted to the relevant attendance center's principal at the time of registration for classes or within fourteen days after the children's first day of attendance during the school year; the principal shall honor a valid request. The district retains complete discretion to select the classroom teacher(s) to which the siblings are assigned. If, after the initial grading period following the placement of siblings in the same or different classrooms, the principal determines the placement is disruptive to the class, the principal may assign one or more of the siblings to different classrooms.

There are board approved Early Childhood Special Education and Pre-kindergarten programs dependent upon funding.

The Superintendent/designee and Board shall endeavor to assign all resident students to their zoned, grade-appropriate attendance centers and to keep students at the same attendance center as their sibling(s) enrolled in grade(s) also served by that center. However, in their discretion, the Superintendent/designee may assign resident students to their non-zoned attendance centers, including but not limited to, when:

- Such adjustment is necessary to address class size and/or feeder capacity;
- Pursuant to Iowa law, there has been a proven allegation of bullying and/or harassment and it is in the best interest of the student to be reassigned;
- The resident student has moved to another attendance area in the district during the school year, the student desires to complete the school year at the attendance center s/he was attending, and the administration approves arrangements for transportation and attendance;
- The resident student presents documentation demonstrating with a high-degree of certainty that his/her residence will change during the school year to another attendance area in the district, the student desires to start the school year in the attendance center zoned to the new residence, and the administration approves arrangements for transportation and attendance;
- The student's zoned in-district attendance center for their senior year of high school is different than the zoned in-district attendance center the student attended at the end of their junior year, the student and parent desire for the student to be assigned to the junior year attendance center for the student's senior year, and the administration approves arrangements for transportation and attendance;
- Assignment to another attendance center would provide educational benefit for the student, including because of the student's need for special services (special education, LIEP supports, etc.); and/or
- The student's sibling(s) have been assigned to a non-zoned school in order to receive special services and/or due to proven allegations of bullying and/or harassment and the student requests assignment to the same attendance center as their sibling(s).

Intra-district transfers occurring due to custodial changes and/or residential changes or requirements in federal law are not subject to this policy.

All nonresident students shall attend the attendance center assigned by the Superintendent/designee. The district, in its discretion, shall assign students open enrolling into the district to an attendance center in the that has available space. Students who open enroll to continue in the district may be subject to a building reassignment.

All open enrolled students will be assigned to the feeder with the lowest certified count-day enrollment at the time of the student's registration.

Cross Reference:

501.08 Placement and Acceptance of Credits Upon Transfer
501.31 Open Enrollment Transfers Into the District
501.32 Open Enrollment Transfers Out of the District
501.35 Intra-District Open Enrollment
504.10 Health Certificate
604.08 International and Foreign Exchange Students
606.06 Insufficient Classroom Space
606.10 Class Size
702.30 Student Eligibility for Transportation

Legal Reference:

Lakota Cons. Ind. School v. Buffalo Center-Rake Comm. School, 334 N.W.2d 704 (Iowa 1983)
Mt. Hope School Dist. V. Hendrickson, 197 N.W. 47 (Iowa 1924)
Oshel v. Creston Comm. School Dist., DPI Admin. Doc. 570 (1981)
33 D.P.I. Dec. Rule 80 (1984)
20 U.S.C. § 1232g
Iowa Code §§ 139A.8; 256.11(A); 257.6; 279.8; 279.11; 280.3, .14; 282.1, .2, .3, .4, .6, .7, .8, .18; 299A; 599.1
Iowa Code §§ 281 I.A.C. 12.2; 12.3(6), (7); 12.5; 17.6(4); 41.404(6)(e)
1956 Op. Att'y Gen. 185.
1946 Op. Att'y Gen. 197.
1938 Op. Att'y Gen. 69.
1930 Op. Att'y Gen. 147.
1980 Op. Att'y Gen. 258.
IASB No. 501.2 (2011)

Adopted:

April 18, 2022

R.R. for Policy 501.05

Registration Requirements

The superintendent/designee shall annually establish student registration requirements. These may include, but are not limited to: completion of registration application(s) and form(s); presentation of proof of residency and/or proof of student birth date; delivery of documentation related to special programs (e.g., special education, gifted and talent) and/or previous school information; delivery of health documents such as records of immunization, physical examination, vision screening, and/or dental screening.

Falsification of any information or document required for residency verification or the use of the address of another person without actually residing there may result in the revocation of student enrollment, being held liable to pay tuition for the time in attendance as a non-resident student, and/or filing a complaint with the appropriate law enforcement agency for criminal prosecution against all parties involved.

Kindergarten Registration

The district shall typically conduct kindergarten registration during the first week of February and shall communicate a specific date via multiple venues including, but not limited to the district's website. Kindergarten registrations will not be accepted prior to the start of the designated registration period.

Generally, the district will communicate building placements for kindergarten students during the second week of June. Registrations received on or after the designated final day of the registration period will be deemed late and will not be considered until all other placements have been made.

If the number of enrolling kindergarteners exceeds capacity at a school(s), the district shall consider the following when making building assignments:

1. classroom space availability,
2. enrollment of siblings in the school, and/or
3. date and time the student's online registration was completed and all other necessary registration paperwork was submitted to the district.

If the student needs special services, including but not limited to LIEP (English Language Learning) or special education, the student may be placed at an elementary school that can best serve the student's needs, regardless of whether it is the student's neighborhood school.

Attendance Center Assignment for Newly-Enrolling Elementary Students

Any elementary student newly enrolling in the district may be assigned to a school other than their neighborhood school. In making attendance center assignments for newly-enrolled elementary school students, the district shall:

1. Determine if there is space in the relevant neighborhood school for all elementary-aged students within the newly-enrolling family.
2. If there is space at the neighborhood school, assign students to the neighborhood school. If there is not space for all elementary-aged students in the family at the neighborhood school, assign the newly-enrolling students to the attendance center with lowest class ratios that can accommodate all elementary-aged members of the family.
3. Notify parents that transportation will be provided for students if the family lives more than 2 miles from the assigned elementary school.
4. If/when space becomes available at the neighborhood school, contact impacted families and offer them the choice of a) having students remain in the assigned school for the remainder of the year and transferring to the neighborhood school at the beginning of the next school year, or b) returning to the neighborhood school immediately.

Intra-District Transfer

Students may seek and the district, in its discretion, may consider intra-district transfer from one district attendance center to another for one or more of the following reasons:

- Pursuant to Iowa law, there has been a proven allegation of bullying and/or harassment and it is in the best interest of the student to be reassigned;
- The resident student has moved to another attendance area in the district during the school year, the student desires to complete the school year at the attendance center s/he was attending, and the administration approves arrangements for transportation and attendance;
- The resident student presents documentation demonstrating with a high-degree of certainty that his/her residence will change during the school year to another attendance area in the district, the student desires to start the school year in the attendance center zoned to the new residence, and the administration approves arrangements for transportation and attendance;
- The student's zoned in-district attendance center for their senior year of high school is different than the zoned in-district attendance center the student attended at the end of their junior year, the student and parent desire for the student to be assigned to the junior year attendance center for the student's senior year, and the administration approves arrangements for transportation and attendance;
- Assignment to another attendance center would provide educational benefit for the student, including because of the student's need for special services (special education, LIEP supports, etc.); and/or
- The student's sibling(s) have been assigned to a non-zoned school in order to receive special services and/or due to proven allegations of bullying and/or harassment and the student requests assignment to the same attendance center as their sibling(s).

Students seeking intra-district transfer shall submit these requests between April 1 – May 1 of the school year prior to the desired intra-district transfer unless extraordinary circumstances, as determined by the district, warrant a deviation from that time frame.

Subject to the superintendent/designee's discretion, the following apply to intra-district transfers:

- An approved intra-district transfer is valid for the following school year, takes effect at the beginning of the school year, and remains in effect for a minimum of one school year.
- Parents of students who transfer within the district under these guidelines shall provide the student's transportation to and from school without reimbursement from the district.
- Ninth through twelfth grade students who transfer within the district shall not be eligible for varsity play for the entirety of the following school year (August 1 - July 31). However, students who transfer to another district attendance center due to a bona fide harassment and/or bullying complaint shall not be prohibited from participating in athletics and/or activities due to their intra-district transfer and shall, if otherwise eligible, be eligible for participation no later than 10 days from the date of transfer.
- The parent of a student attending a non-zoned attendance center due to an intra-district transfer may, at any time, request that the student attend the zoned school. In evaluating such a request, the district will consider factors including but not limited to: the reasons for the student's transfer, the physical capacity of the zoned school, and the best interests of the student and other students. A student returning to a zoned school from an intra-district transfer shall be subject to the varsity play eligibility restrictions outlined above.

The board may sever an intra-district transfer if it is in the best interest of the district to do so. Unless extraordinary circumstances require otherwise, the action to sever shall be taken on or before May 15 of the school year prior to the intended elimination of the transfer. A severed intra-district transfer shall take effect at the start of the school year following the severance unless the board and parent of the transferee student mutually agree in writing to an earlier effective date. Restrictions on varsity play eligibility shall not apply when the board severs the intra-district transfer.

Parents may appeal intra-district transfer decisions to the superintendent/designee for review. The superintendent's/designee's decision shall be final and binding.

[Click here for the Intra-District Transfer Application](#)

Special Education

For building assignment of special education students, the district will use the formula for caseload determination specified in the District Developed Special Education Service Delivery Plan.

800 SERIES BUSINESS PROCEDURES

802.55 Post-Issuance Compliance Regulation

Issuers of tax-exempt governmental bonds must comply with federal tax rules pertaining to expenditure of proceeds for qualified costs, rate of expenditure, use of bond financed property, investment of proceeds in compliance with arbitrage rules, and retention of records.

As an issuer of such bonds, the District is required by IRS rules and regulations to take certain actions subsequent to the issuance of the bonds to ensure the continuing tax-exempt status of such bonds. Further, Section 6001 of the Code and Section 1.6001-1(a) of the Treasury Regulations impose record retention requirements with respect to tax-exempt governmental bonds. The District Treasurer shall be responsible for developing, implementing and administering procedures to ensure District compliance with applicable tax regulations and requirements.

Cross-Reference:
802.50 Bond Issues
802.56 Bond Disclosure

Adopted:
March 26, 2012

Reviewed:
October 16, 2017
March 31, 2022

Revised:
April 18, 2022

802.55 R.R. Definitions

- “Advisors” means the Issuer’s Bond Counsel, Financial Advisor, paying agent, and Rebate Analyst.
- “Bonds” mean bonds, notes or other obligations subject to the Code, Rules and applicable securities regulations.
- “Code” means the Internal Revenue Code of 1986, as amended.
- “Governing Body” means the Board of Directors of the Issuer.
- “Issuer” means the Ankeny Community School District, in the County of Polk, State of Iowa.
- “Rules” means Sections 103 and 141 through 150 of the Internal Revenue Code of 1986, as amended, and the U.S. Treasury Regulations promulgated thereunder.

Purpose

These operating procedures, which to the best knowledge and belief of the Governing Body and administrative staff have heretofore been followed, although not set forth in formal written operating procedures are intended to assure that the Issuer shall meet its compliance obligations as an issuer of tax-exempt bonds and particularly with respect to the expenditure of proceeds for

qualified costs, rate of expenditure, use of bond financed property, investment of proceeds in compliance with arbitrage rules, and retention of records.

These operating procedures are designed to implement Issuer's Policy 802.55 and ensure that the Issuer complies with its tax compliance obligations under applicable provisions of the Rules and the Code.

Effective Date and Term

The effective date of these procedures shall be the date of approval by the Governing Body, and shall remain in effect until superseded or terminated by action of the Governing Body. The Issuer shall comply with these procedures upon issuance of Bonds and as long as the Bonds remain outstanding. These procedures may be revised to comply with amendments to the Rules during the period the Bonds are outstanding.

Responsible Parties

The District Treasurer shall be the party primarily responsible for ensuring that the Issuer successfully carries out its tax compliance requirements under applicable provisions of the Rules with regard to all obligations of the Issuer. The District Treasurer is referred to as the "Compliance Officer" for purposes of this policy. The Compliance Officer shall be assisted by other staff and officials when appropriate and at the Compliance Officer's discretion. The Compliance Officer shall also be authorized to retain and consult with the Advisors during the time the Bonds are outstanding for assistance in carrying out post-issuance tax compliance requirements.

The Compliance Officer shall be responsible for monitoring post-issuance compliance, maintaining a copy of the transcript of proceedings or minutes in connection with the issuance of any tax-exempt obligations and obtaining records that are necessary to meet the requirements of this regulation, seeking out training and education to be implemented upon the occurrence of new developments in the area and upon the hiring of new personnel to implement this regulation, and assigning post-issuance tax compliance responsibilities to other staff. The Compliance Officer shall consult Advisors or such other professional service organizations as are necessary to ensure compliance with the post-issuance tax compliance requirements of the Issuer. The Compliance Officer shall provide training and educational resources to staff responsible for ensuring compliance with any portion of the tax compliance requirements of this policy.

Expenditure of Bond Proceeds – Review Process

The Compliance Officer shall review the resolution authorizing issuance for each tax-exempt obligation, and shall:

1. obtain a computation of the yield on such issue from the Issuer's financial advisor;
2. create a separate Project Fund (with as many sub-funds as shall be necessary to allocate proceeds among the projects being funded by the issue) into which the proceeds of issue shall be deposited;
3. review all requisitions, draw schedules, draw requests, invoices and bills requesting payment from the Project Fund;

4. determine whether payment from the Project Fund is appropriate, and if so, make payment from the Project Fund (and appropriate sub-fund if applicable);
5. maintain records of the payment requests and corresponding evidence of payment;
6. maintain records showing the earnings on, and investment of, the Project Fund;
7. ensure that investments acquired with proceeds are purchased at fair market value;
8. identify bond proceeds or applicable debt service allocations that must be invested with a yield-restriction and monitor the investments of any yield-restricted funds to ensure that the yield on such investments does not exceed the yield to which such investments are restricted;
9. in the event the Issuer seeks to utilize bond proceeds for costs that were incurred prior to the issuance of the Bonds, the Compliance Officer shall consult with the Advisors to ensure that such expenditures are within the sixty (60) day period prior to the date in which the Issuer made a “declaration of intent” to reimburse such costs or are preliminary expenditures under the Code. If proceeds are used for such reimbursement, a copy of the declaration of intent shall be obtained and included in the records for the Bonds if not already part of the transcript; and
10. if not otherwise provided for in the Tax Exemption Certificate executed by the officers of the Issuer at closing, the Compliance Officer shall prepare an “allocation memorandum” for each issue of Bonds that accounts for the allocation of the proceeds of the Bonds to expenditures not later than the earlier of:
 - A. Eighteen (18) months after the later of:
 - I. the date the expenditure is paid, or
 - II. the date the project that is financed by the Bonds is placed in service; or
 - B. Sixty (60) days after the earlier of:
 - I. the fifth (5th) anniversary of the issue date of the Bonds, or
 - II. the date sixty (60) days after the retirement of the Bonds; and
11. maintain records related to any investment contracts, credit enhancement transactions and the bidding of financial products related to the proceeds.

Rate of Expenditure

The Compliance Officer shall ensure that the expenditure of bond proceeds will be monitored against the expenditure expectations represented in the tax exemption certificate for such bond issue to ensure that:

- Five percent (5%) of the net sale proceeds were spent or committed within six (6) months of the issue date;
- Eighty-five percent (85%) of the net sale proceeds were spent within three (3) years of the issue date; and
- the Issuer proceeded with due diligence to complete the project and fully spend the net sale proceeds; or
- One hundred percent (100%) of proceeds used for current refunding within ninety (90) days of issuance.

Failure to meet the expected expenditure expectations represented in the tax exemption certificate for such bond issue shall be documented and retained by the Compliance Officer in the records for the bond issue.

Arbitrage Rules and Rebate Requirements

The Compliance Officer shall review the Tax-Exemption Certificate for each tax-exempt obligation, and the expenditure records, and shall:

1. monitor and ensure that proceeds of each such issue are spent within the temporary period set forth in such certificate;
2. if the “small issuer” exception does not apply (not more than \$15 million issued in a calendar year, of which not more than \$5 million was for non-construction purposes), monitor and ensure that the proceeds are spent in accordance with one or more of the applicable exceptions to rebate as set forth in such certificate (e.g. six month exception, eighteen month exception, two year “construction issue” exception);
3. not less than sixty (60) days prior to a required expenditure date within applicable rebate exception(s), confer with bond counsel if it appears expenditures will fail to meet the applicable temporary period or rebate exception expenditure requirements of the Tax-Exemption Certificate;
4. in the event of failure to meet a temporary period or rebate exception:
 - A. procure a timely computation of any rebate liability and, if rebate is due, file a Form 8038-T and arrange for payment of such rebate liability;
 - B. arrange for timely computation and payment of “yield reduction payments” (as such term is defined in the Code and Treasury Regulations), if applicable;
5. ensure that the investment of bond proceeds is made only in permitted investments of the Issuer as outlined in Iowa Code chapters 12B and 12C, and any official policy;
6. consult with the Advisors to ensure that the investment of bond proceeds is performed in compliance with the arbitrage rules and rebate requirements;
7. consult with the Advisors to identify bond proceeds that must be yield-restricted and shall monitor the investments of any yield-restricted funds to ensure that the yield on such investments does not exceed the yield to which such investments are restricted;
8. contact the Rebate Analyst (and, if appropriate, bond counsel) prior to the fifth anniversary of the date of issuance of each issue of bonds of the Issuer and each fifth anniversary thereafter to arrange for calculations and reports of the rebate requirements with respect to such bonds;
9. if a rebate payment is required to be paid by the Issuer, the Compliance Officer shall prepare or cause to be prepared the appropriate form to be filed with the IRS (Form 8038-T);
10. The Compliance Officer shall ensure that guaranteed investment contracts (GIC) will be purchased only using the three-bid “safe harbor” of applicable Treasury regulations, in compliance with fee limitations on GIC brokers in the regulations. The Compliance Officer shall ensure that all other investments will be purchased only in market transactions.

Filings with Internal Revenue Service

The Compliance Officer, with assistance from Bond Counsel, shall ensure that each issuance of Bonds is properly reported with the Internal Revenue Service (IRS) as required by Section 149(e) of the Code. On the issue date of each series of Bonds, the Compliance Officer shall consult with the Advisors to identify the deadline to file the requisite IRS form for such issue.

If a bond issue consists of tax-exempt Bonds, the Issuer must report the tax-exempt portion on Form 8038-G or 8038-GC. The Compliance Officer shall confirm the proper filing of an IRS

8038 Series return and maintain a transcript of proceedings and minutes for all tax-exempt obligations issued by the school district including, but not limited to, all tax-exempt bonds, notes and lease-purchase contracts. Each transcript shall be maintained until 11 years after the tax-exempt obligation documents have been retired. The transcript shall include, at a minimum:

- Form 8038;
- Minutes, resolutions and certificates;
- Certifications of issue price from the underwriter;
- Formal elections required by the IRS;
- Trustee statements;
- Records of refunded bonds, if applicable;
- Correspondence relating to bond financings; and
- Reports of any IRS examinations for bond financings.

Reporting the Issuance of Tax-Exempt Bonds

The original issuance of a tax-exempt bond issue with an issue price of one-hundred thousand dollars (\$100,000) or greater shall be reported on Form 8038-G. The original issuance of a tax-exempt bond issue with an issue price less than one-hundred thousand dollars (\$100,000) shall be reported on Form 8038-GC.

- Forms 8038-G and 8038-GC shall be filed by the Compliance Officer or Bond Counsel no later than the 15th day of the 2nd calendar month following the quarter in which the Bonds were issued.
- The Compliance Officer shall consult with the Advisors to ensure the Form 8038-G is accurately filled out.

Rebate Reporting Requirements

The Compliance Officer shall contact the rebate analyst prior to the 5th anniversary of the issue date on each series of Bonds and each 5th anniversary thereafter to arrange for calculations of the rebate requirements with respect to such Bonds. If a rebate payment is required to be paid, the Compliance Officer shall prepare or cause to be prepared a Form 8038-T, and submit such Form 8038-T to the IRS with the required rebate payment.

If the Issuer is authorized to recover a rebate payment previously paid, the Compliance Officer shall prepare or cause to be prepared a Form 8038-R, with respect to such rebate recovery, and submit such Form 8038-R to the IRS.

Use of Bond-Financed Property

The Compliance Officer shall monitor the use of all bond-financed facilities in order to determine whether private business uses of bond-financed facilities have exceeded the de minimis limits set forth in Section 141(b) of the Code (generally 10% of bond proceeds) as a result of leases and subleases, licenses, management contracts, research contracts, naming rights agreements or other arrangements that provide special legal entitlements to nongovernmental persons. Prior to entering into such leases or other contracts, the Compliance Officer shall consult with Bond Counsel to ensure appropriate action is taken with respect to the bond-financed facilities.

To this end, the Compliance Officer shall:

1. maintain appropriate records and a list of all bond financed assets. Such records shall include the actual amount of proceeds (including investment earnings) spent on each of the bond financed assets;
2. with respect to each bond financed asset, the Compliance Officer will monitor and confer with bond counsel with respect to all proposed:
 1. management contracts,
 2. service agreements,
 3. research contracts,
 4. naming rights contracts,
 5. easements or sub-leases,
 6. joint venture, limited liability or partnership arrangements,
 7. sale of property;
 8. any other change in use of such asset; or
 9. output contracts (including retail and wholesale requirements contracts);
3. maintain a copy of the proposed agreement, contract, lease or arrangement, together with the response by bond counsel with respect to the proposal for at least three (3) years after retirement of all tax-exempt obligations issued to fund all or any portion of bond financed assets, or obligations issued to refund those obligations;
4. provide training and educational resources to any staff member that has the primary responsibility for the operation, maintenance, or inspection of bond-financed facilities with regard to the limitations on the private business use and on the private security or payments with respect to bond-financed facilities;
5. ensure that no item of bond-financed property will be sold or transferred to a nonexempt party without advance arrangement of a “remedial action” under the applicable Treasury Regulations and the Compliance Officer shall consult with bond counsel prior to the sale or transfer of any bond-financed property; and
6. In the event of an action with respect to a bond financed asset, which may cause the private business tests or private loan financing test to be met, the Compliance Officer shall contact bond counsel for advice and ensure timely remedial action under IRS Regulation Sections 1.141-12.

Advance Refundings¹

The Compliance Officer shall be responsible for the following current, post issuance and record retention procedures with respect to advance refunding bonds:

- Identify and select bonds to be advance refunded with advice from internal financial personnel, and/or the Issuer’s Financial Advisor;
- Identify, with advice from Advisors, any possible federal tax compliance issues prior to structuring any advance refunding;
- Review the structure with the input of the Advisors, of advance refunding issues prior to the issuance to ensure;
 - that the proposed refunding is permitted pursuant to applicable federal tax requirements if there has been a prior refunding of the original bond issue;
 - that the proposed issuance complies with federal income tax requirements which might impose restrictions on the redemption date of the refunded bonds;

¹ The Tax Cuts and Jobs Act of 2017 eliminated the authority to issue tax-exempt advance refundings. Taxable advance refundings may be issued.

- that the proposed issuance complies with federal income tax requirements which allow for the proceeds and replacement proceeds of an issue to be invested temporarily in higher yielding investments without causing the advance refunding bonds to become “arbitrage bonds”; and
- that the proposed issuance will not result in the Issuer’s exploitation of the difference between tax exempt and taxable interest rates to obtain an financial advantage nor overburden the tax exempt market in a way that might be considered an abusive transaction for federal tax purposes.
- Collect and review data related to arbitrage yield restriction and rebate requirements for advance refunding bonds. To ensure such compliance, the Compliance Officer shall engage a rebate consultant to prepare a verification report in connection with the advance refunding issuance. Said report shall ensure said requirements are satisfied.
- Ensure, whenever possible, the purchase of demand deposit Treasury securities from the State and Local Governmental Series (“SLGS”) to size each advance refunding escrow. The Financial Advisor shall be included in the process of subscribing SLGS. To the extent SLGS are not available for purchase, the Compliance Officer shall, in consultation with Bond Counsel and the Financial Advisor, comply with IRS regulations.
- To the extent as Issuer elects to the purchase a guaranteed investment contract, the Compliance Officer shall ensure, after input from Bond Counsel, compliance with any bidding requirements set forth by the IRS regulations.
- In determining the issue price for any advance refunding issuance, the Compliance Officer shall obtain and retain issue price certification by the purchasing underwriter at closing.
- After the issuance of an advance refunding issue, the Compliance Officer shall ensure timely identification of violations of any federal tax requirements and engage Bond Counsel in attempt to remediate same in accordance with IRS regulations.

Record Retention

Management and retention of records related to the Issuer’s bond issues shall be supervised by the Compliance Officer. Records and documents pertaining to cancellation, transfer, redemption or replacement of Issuer bonds shall be preserved by the Issuer or its agent for a period of not less than 11 years, as set forth in Iowa Code Section 76.10. Other records shall be retained during the period in which the bonds remain outstanding (plus any refunding bonds) plus three (3) years. Records may be in the form of documents and electronic copies of documents, appropriately indexed to specific bond issues and compliance functions.

The Compliance Officer shall collect and retain the following records with respect to each issue of Bonds of the Issuer and with respect to the facilities financed with the proceeds of such Bonds:

- audited financial statements of the Issuer;
- appraisals, demand surveys, or feasibility studies, if any, with respect to the facilities to be financed with the proceeds of such Bonds;
- applications, approvals and other documentation of grants;
- publications, brochures, and newspaper articles, if any, related to the bond financing;
- trustee or paying agent statements;
- records of all investments and the gains (or losses) from such investments;
- paying agent or trustee statements regarding investments and investment earnings;

- reimbursement resolutions, if any, and expenditures reimbursed with the proceeds of such Bonds;
- allocations of proceeds to expenditures (including costs of issuance) and the dates and amounts of such expenditures (including any requisitions, expenditure/draw schedules, expenditure/draw requests, invoices, bills, and cancelled checks with respect to such expenditures;
- contracts entered into for the construction, renovation, or purchase of bond-financed facilities;
- an asset list or schedule of all bond financed depreciable property and any depreciation schedules with respect to such assets or property;
- records of the purchases and sales of bond-financed assets;
- private business uses of bond-financed facilities that arise subsequent to the date of issue through leases and subleases, licenses, management contracts, research contracts, naming rights agreements, or other arrangements that provide special legal entitlements to nongovernmental persons and copies of any such agreements or instruments; arbitrage rebate reports and records of rebate and yield reduction payments, if any; resolutions or other actions, if any, taken by the Board of Education subsequent to the date of issue with respect to such Bonds;
- formal elections authorized by the Code or Treasury Regulations that are taken with respect to such Bonds
- relevant correspondence relating to such Bonds;
- documents related to guaranteed investment contracts or certificates of deposit, credit enhancement transactions, and financial derivatives entered into subsequent to the date of issue;
- copies of any and all forms filed with the IRS for each series of Bonds including, as applicable, Form 8038-G, Form 8038-GC; and
- the official transcript prepared by Bond Counsel with respect to each series of Bonds of the Issuer.

Identification of Violations and Corrections

If, during the period the Bonds remain outstanding, it is determined that a violation of federal tax requirements has occurred, the Compliance Officer shall immediately consult with the Advisors to ensure that corrective or remedial action is taken. In consultation with Bond Counsel, the Compliance Officer shall become acquainted with the remedial actions under Treasury Regulations, Section 1.141-12, to be utilized in the event that private business use of bond-financed facilities exceeds the de minimus limits under Section 141(b)(1) of the Code. In consultation with Bond Counsel, the Compliance Officer shall become acquainted with the Tax Exempt Bonds Voluntary Closing Agreement Program, described in Notice 2008-31, 2008-11 I.R.B. 592, to be utilized as a means for an issuer to correct any post-issuance infractions of the Rules with respect to its outstanding Bonds.

Continuing Disclosure Obligations

In addition to its post-issuance compliance requirements under applicable provisions of the Rules, the Issuer has agreed to provide continuing disclosure, such as annual financial information and event notices, pursuant to a continuing disclosure certificate or similar document (the "Continuing Disclosure Certificate") prepared by Bond Counsel and made a part of the

transcript with respect to each issue of Bonds of the Issuer that is subject to such continuing disclosure requirements. The Continuing Disclosure Documents shall be executed by the Issuer to assist the underwriters of the Issuer's Bonds in meeting their obligations under Securities and Exchange Commission Regulation, 17 C.F.R. Section 240.15c2-12, as in effect and interpreted from time to time ("Rule 15c2-12"). The continuing disclosure obligations of the Issuer shall be governed by the Continuing Disclosure Certificate, by Rule 15c2-12, and by the Bond Disclosure Policy. The Compliance Officer shall be primarily responsible for undertaking such continuing disclosure obligations and to monitor compliance with such obligations.

Other Post-Issuance Actions

If, in consultation with the Advisors, the Compliance Officer determines that any additional action not identified in this policy must be taken by the Compliance Officer to ensure the continuing tax-exempt status or "qualified" status of any issue of the Issuer's Bonds, the Compliance Officer shall take such action if the Compliance Officer has the authority to do so. If, after consultation with the Advisors, the Compliance Officer determines that this policy shall be amended or supplemented to ensure the continuing tax-exempt status or "qualified" status of any issue of the Issuer's Bonds, the Compliance Officer shall follow the appropriate Issuer policy that this document be so amended or supplemented.

Taxable Governmental Bonds

Most of the provisions of this policy, other than the provisions Continuing Disclosure Obligations subsection of this policy, are not applicable to governmental Bonds the interest on which is includable in gross income for federal income tax purposes (i.e. "taxable governmental Bonds"). If an issue of taxable governmental Bonds is later refunded with the proceeds of an issue of tax-exempt governmental Bonds, then the uses of the proceeds of the taxable governmental Bonds and the uses of the facilities financed with the proceeds of the taxable governmental Bonds shall be relevant to the tax-exempt status of the refunding Bonds. Therefore, if there is any reasonable possibility that an issue of taxable governmental Bonds may be refunded, in whole or in part, with the proceeds of an issue of tax-exempt governmental Bonds then, for purposes of this policy, the Compliance Officer shall treat the issue of taxable governmental Bonds as if such issue were an issue of tax-exempt governmental Bonds and shall carry out and comply with the requirements of this policy with respect to such taxable governmental Bonds. The Compliance Officer shall seek the advice of Bond Counsel as to whether there is any reasonable possibility of issuing tax-exempt governmental Bonds to refund an issue of taxable governmental Bonds.

**800 SERIES
BUSINESS PROCEDURES**

802.56 Bond Disclosure Policy

Article I: Key Participants and Responsibilities

Section 1.01. Compliance Officer. By adoption of this policy, the district hereby appoints the board treasurer to act as the Compliance Officer hereunder.

Section 1.02. Responsibilities. The Compliance Officer is responsible for the following tasks:

- (A) reviewing and approving all preliminary and final official statements relating to the district's securities, together with any supplements, for which a Disclosure Agreement is required (each, an "Official Statement"), before such documents are released, in accordance with Article III below;
- (B) moderating board of directors' approval of all financial obligations triggering a Listed Event Notice under any new Disclosure Agreement entered into on or after February 27, 2019;
- (C) reviewing the district's status and compliance with Disclosure Agreements, including filings of disclosure documents thereunder and in compliance with this policy, in accordance with Articles IV and V below;
- (D) serving as a "point person" for personnel to communicate issues or information that should be or may need to be included in any disclosure document;
- (E) recommending changes to this policy to the board of directors as necessary or appropriate;
- (F) communicating with third parties, including coordination with outside consultants assisting the district, in the preparation and dissemination of disclosure documents to make sure that assigned tasks have been completed on a timely basis and make sure that the filings are made on a timely basis and are accurate;
- (G) in anticipation of preparing disclosure documents, soliciting "material" information (as defined for purposes of federal securities law) from employees identified as having knowledge of or likely to have information of Listed Events under Article IV or relevant to Disclosure Agreements;
- (H) maintaining records documenting the district's compliance with this policy; and
- (I) ensuring compliance with training procedures as described below.

The responsibilities of the Compliance Officer to make certain filings with the MSRB under Articles III (Annual Report Filings) and IV (Listed Event Filings) may be delegated by contract to a dissemination agent, under terms approved by the board of directors.

The Compliance Officer shall instruct employees of the obligation to communicate with the Compliance Officer on any information relating to financial obligations or amendments to existing financial obligations promptly following occurrence.

Article II: Official Statements

Section 2.01. Review and Approval of Official Statements. Whenever the district issues securities, an Official Statement may be prepared. Each of these Official Statements contains information relating to the district's finances. The Compliance Officer (with advice from bond counsel, any retained disclosure counsel, and/or financial advisor) shall have primary responsibility for ensuring that all such information is accurate and not misleading in any material aspect. The Official Statement may also include a certification that the information contained in the Official Statement regarding the district, as of the date of each Official Statement, does not contain any untrue statement of material fact or omit to state any material fact necessary to make the information contained in the Official Statement, in light of the circumstances under which it was provided, not misleading. When undertaking review of a final or preliminary Official Statement, the Compliance Officer shall:

- (A) review the Official Statement to ensure: (i) that there are no material misstatements or omissions of material information in any sections, (ii) that the information relating to the district that is included in the Official Statement is accurate, and (iii) that when necessary the information relating to the district has been reviewed by a knowledgeable employee or other appropriate person;
- (B) draft, or cause to be drafted, for the Official Statement descriptions of (i) any material current, pending or threatened litigation, (ii) any material settlements or court orders and (iii) any other legal issues that are material information for purposes of the Official Statement; and
- (C) report any significant disclosure issues and concerns to the board of directors (with advice, as necessary, from bond counsel, retained disclosure counsel, if any, and/or financial advisor).

Section 2.02. Submission of Official Statements to Board of Directors for Approval. The Compliance Officer shall submit all Official Statements to the board of directors for review and approval. The board of directors shall undertake such review it deems necessary. This may include consultation with the Compliance Officer, bond counsel, retained disclosure counsel, if any, and/or the financial advisor to fulfill the district's responsibilities under applicable federal and state securities laws.

Article III: Annual Report Filings

Section 3.01. Overview. Under the Disclosure Agreements the district has entered into in connection with certain of its securities, the district is required each year to file Annual Reports with the EMMA system. Such Annual Reports are generally required to include: (1) certain updated financial and operating information as outlined in each Disclosure Agreement, and (2) the district's audited financial statements. The documents, reports and notices required to be submitted to the MSRB pursuant to this policy shall be submitted through EMMA in one or more electronic document format files as required by the rule at the time of filing, and shall be accompanied by identifying information, in the manner prescribed by the MSRB, or in such other manner as is consistent with the Rule. To facilitate the district's Disclosure Agreements the Compliance Officer shall:

- (A) maintain a record of all Disclosure Agreements of the district using a chart which shall identify and docket all deadlines;
- (B) schedule email reminders on the EMMA website for each issue of securities to help ensure timely filing of financial disclosures;
- (C) ensure that preparation of the Annual Reports commences as required under each specific Disclosure Agreement; and
- (D) comply with the district's obligation to file Annual Reports by submitting or causing the required (i) annual financial information and operating data and (ii) audited financial statements to be submitted to the MSRB through EMMA.
 - (i) In the event audited financial statements are not available by the filing deadline imposed by the Disclosure Agreement, the Compliance Officer shall instead timely submit or cause to be submitted unaudited financial statements, with a notice to the effect that the unaudited financial statements are being provided pending the completion of audited financial statements and that the audited financial statements will be submitted to EMMA when they have been prepared. In the event neither audited nor unaudited financial statements are timely posted, the district shall cause to be filed a "failure to file notice" in accordance with the Rule. The failure to file notice for audited financial statements shall include information describing the nature and/or cause of the failure to meet the contractual deadline and, if available, an approximate timeframe for when the completed audited financial statement is expected to be submitted. Audited financial statements shall be filed as soon as available. If updated financial and operating information is not posted by the filing deadline, the Compliance Officer shall cause a "failure to file notice" to be posted to EMMA in accordance with the Rule.
 - (ii) All documents submitted to the MSRB through EMMA that are identified by specific reference to documents already available to the public on the MSRB's

Internet website or filed with the SEC shall be clearly identified by cross reference.

Article IV: *Listed Event Filings*

Section 4.01. Disclosure of Listed Events. The district is obligated to disclose to the MSRB notice of certain specified events with respect to the Securities (a "Listed Event"). Employees shall be instructed to notify the Compliance Officer upon becoming aware of any of the Listed Events in the District's Disclosure Agreements. The Compliance Officer may consult with bond counsel, retained disclosure counsel, if any, or the financial advisor, to determine if an occurrence is a Listed Event, and whether a filing is required or is otherwise desirable. If such a filing is deemed necessary, the Compliance Officer shall cause a notice of the Listed Event (a "Listed Event Notice") that complies with the Rule to be prepared, and the Compliance Officer shall cause to be filed the Listed Event Notice as required by the rule as follows:

- (A) Prior to issuance of new Securities on or after February 27, 2019, a complete list of current Financial Obligations shall be compiled and submitted to the Compliance Officer for continuous monitoring regarding compliance with all Disclosure Agreements entered on or after February 27, 2019.
- (B) The Compliance Officer shall:
 - (i) monitor and periodically review the Listed Events identified on Exhibit A, in connection with the Disclosure Agreements identified on the chart in Exhibit B to determine whether any event has occurred that may require a filing with EMMA. To the extent Compliance Officer determines notice for an event is not required based on the event not achieving a level of materiality, Compliance Officer shall document the basis for the determination.
 - (ii) In a timely manner, not in excess of ten (10) business days after the occurrence of the Listed Event, file a Listed Event Notice for Securities to which the Listed Event applies.
- (C) For Securities to which the Listed Event or Events are applicable, the Listed Event Notice shall be filed in a timely manner not in excess of ten (10) business days after the occurrence of the Listed Event.
- (D) The Compliance Officer shall monitor securities data on EMMA regarding rating agency reports for rated Securities and may subscribe to any available ratings agency alert service regarding the ratings of any securities.

Article V: Miscellaneous

Section 5.01. Documents to be Retained. The Compliance Officer shall be responsible for retaining records demonstrating compliance with this Policy. The Compliance Officer shall retain an electronic or paper file ("Transcript") for each Annual Report the district completes. Each Transcript shall include final versions of documents submitted to the MSRB through EMMA, and any documentation related to determinations of materiality (or immateriality) of Listed Events. The Transcript shall be maintained for the period that the applicable securities are outstanding, and for a minimum of five (5) years after the date the final Annual Report for an issue of Securities is posted on EMMA.

Section 5.02. Education and Training. The district shall conduct periodic training to assist the Compliance Officer, Employees and the Supervisors, as necessary and appropriate, in understanding and performing their responsibilities under this Policy. Such training sessions may include a review of this policy, the disclosure obligations under the Disclosure Agreement(s), applicable federal and state securities laws, including the Listed Events in Exhibit A, and the disclosure responsibilities and potential liabilities of members of district staff and members of the board of directors. Training sessions may include meetings with bond counsel, retained disclosure counsel, if any, dissemination agent, if any, or financial advisor, and teleconferences, attendance at seminars or conferences where disclosure responsibilities are discussed, and/or recorded presentations. Compliance Officer shall maintain a record of training activities in furtherance of this policy.

Section 5.03. Public Statements Regarding Financial Information. Whenever the district makes statements or releases information relating to its finances to the public that is reasonably expected to reach investors and the trading markets (including, without limitation, all Listed Event Notices, statements in the annual financial reports, and other financial reports and statements of the district), the district is obligated to ensure that such statements and information are accurate and complete in all material aspects. The Compliance Officer shall assist the board of directors, the superintendent, and district's attorneys in ensuring that such statements and information are accurate and not misleading in any material aspect. Employees shall, to the extent possible, coordinate statements or releases as outlined above with the Compliance Officer. Investment information published on the district's website shall include a cautionary statement referring investors to EMMA as the official repository for the district's securities-related data.

Cross-Reference:

802.50 Bond Issues

802.55 Post-Issuance Compliance Regulation

Adopted:

April 18, 2022

EXHIBIT A
LISTED EVENTS

The following events automatically trigger a requirement to file on EMMA within ten (10) business days of their occurrence (listed events are subject to change by the SEC):

- (1) Principal and interest payment delinquencies;
- (2) Non-payment related defaults, *if material*;
- (3) Unscheduled draws on debt service reserves reflecting financial difficulties;
- (4) Unscheduled draws on credit enhancements reflecting financial difficulties;
- (5) Substitution of credit or liquidity providers, or their failure to perform;
- (6) Adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB) or other material notices or determinations with respect to the tax status of the security, or other material events affecting the tax status of the security;
- (7) Modifications to rights of security holders, *if material*;
- (8) Bond calls, *if material*, and tender offers;
- (9) Defeasances;
- (10) Release, substitution, or sale of property securing repayment of the securities, *if material*;
- (11) Rating changes;
- (12) Bankruptcy, insolvency, receivership or similar event of the obligated person¹;

Note to paragraph (b)(5)(i)(C)(12):

For the purposes of the event identified in paragraph (b)(5)(i)(C)(12) of this section, the event is considered to occur when any of the following occur: The appointment of a receiver, fiscal agent or similar officer for an obligated person in a proceeding under the U.S. Bankruptcy Code or in any other proceeding under state or federal law in which a court or governmental authority has assumed jurisdiction over substantially all of the assets or business of the obligated person, or if such jurisdiction has been assumed by leaving the existing governing body

¹ The term "obligated person" for purposes of the Rule shall mean the party, if other than the District, responsible for the Securities, e.g. in a conduit issue sold through the District, the conduit party would be the "obligated person" under the Disclosure Agreement.

and officials or officers in possession but subject to the supervision and orders of a court or governmental authority, or the entry of an order confirming a plan of reorganization, arrangement or liquidation by a court or governmental authority having supervision or jurisdiction over substantially all of the assets or business of the obligated person.

(13) The consummation of a merger, consolidation, or acquisition involving an obligated person or the sale of all or substantially all of the assets of the obligated person, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, *if material*;

(14) Appointment of a successor or additional trustee or the change of name of a trustee, *if material*;

Additionally, the following events apply to Disclosure Agreements entered by the district on or after February 27, 2019:

(15) Incurrence of a Financial Obligation of the obligated person, *if material*², or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a Financial Obligation of the obligated person, any of which affect security holders, *if material**; and

(16) Default, event of acceleration, termination event, modification of terms, or other similar events under the terms of a Financial Obligation of the obligated person, any of which reflect financial difficulties.

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² Materiality is determined upon the incurrence of each distinct Financial Obligation, taking into account all relevant facts and circumstances. A Financial Obligation is considered to be incurred when it is enforceable against the District. Listed Event Notices for Financial Obligations (e.g. under 15 and 16 above) should generally include a description of the material terms of the Financial Obligation, including: (i) date of the incurrence, (ii) principal amount, (iii) maturity and amortization; (iv) interest rate(s), if fixed, or method of computation, if variable, (v) other appropriate terms, based on the circumstances. In addition to a summary of material terms, the District may alternatively, or in addition, submit related materials, such as transaction documents (which may require some redaction), terms sheets prepared in connection with the Financial Obligation, or continuing covenant agreements or financial covenant reports.

EXHIBIT B
DISCLOSURE AGREEMENT INVENTORY
Complete upon each new issuance

NAME OF ISSUE/PRINCIPAL AMOUNT	DATE OF ISSUE	FINAL MATURITY DATE	CUSIP FOR FINAL MATURITY	DATE BY WHICH ANNUAL REPORTS MUST BE FILED (OR "EXEMPTION" UNDER THE RULE)	ANNUAL REPORTS INFORMATION TO BE FILED	SOURCE OF INFORMATION	DATE INFORMATION WAS FILED



ANKENY COMMUNITY SCHOOL DISTRICT

Item Cover Sheet

Title: Future Meeting Dates

Extended Information:

- April 21, 2022
- May 19, 2022

ATTACHMENTS:

File Name	Description	Type	Upload Date
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No Attachments Available