

EMPLOYEE POLICY BOOK

2026 – 2027 Edition

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I. COLORADO ACADEMY MISSION STATEMENT AND VALUES

The mission statement of Colorado Academy is as follows:

Creating Curious, Kind, Courageous, and Adventurous Learners and Leaders.

The following values guide and inform our work:

- **We foster courage**: exploring new challenges in academics, athletics, the arts, and experiential learning.
- **We nurture curiosity**: the foundation of lifelong, creative discovery.
- **We choose kindness**: engaging graciously in an inclusive, joyful community.
- **We encourage understanding**: listening to others and acting ethically, with integrity and respect.
- **We embrace inclusivity**: working through education to create empathy and compassion.
- **We promote habits of health**, both physically and mentally, strengthening resilience and confidence.
- **We believe in a dynamic response** to the needs of an ever-changing world.
- **We inspire thoughtful individuals** who are ready to transform the future.

II. PURPOSE OF EMPLOYEE POLICY BOOK

A. Introduction

This Employee Policy Book (the "Policy Book) provides an overview of Colorado Academy's employment practices, expectations, and benefits. All employees are expected to read and understand the Policy Book. All employees are encouraged to speak with their supervisors, the Head of School, Assistant Head of School, Chief Financial and Operating Officer (CFOO), or Human Resources (HR) concerning any questions they have about CA's policies, procedures, practices, or other issues of concern.

Neither this Policy Book nor any other Colorado Academy guideline, policy, or practice creates an employment agreement or contract. In the absence of a written employment agreement or appointment letter which expressly provides to the contrary, employment with CA is "at will." This means that employment with CA is at the mutual consent of CA and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice.

B. Scope and Applicability

This Policy Book supersedes all prior handbooks and policies. Although CA has attempted to cover as many situations as possible in this Policy Book, no handbook can anticipate every circumstance. Moreover, CA may modify, interpret, vary, deviate from, or make exceptions to these policies at any time, with or without notice, under appropriate circumstances, as determined in its sole and absolute discretion. Certain employee benefits summarized by this Policy Book are described in separate plan documents and Summary Plan Descriptions (SPDs). Where conflicts exist, official plan documents control over any statement made in this Policy Book or by any member of the administration.

The guidelines set forth in the Policy Book apply to all employees of CA including, but not limited to:

1. Part-time, Seasonal and Temporary Employees

Part-time, seasonal, and temporary employees do not receive the benefits set forth in the Policy Book and should consult with Human Resources to determine which benefits, if any, are available.

2. Employees with Written Appointment Letters

If any employee of CA has a written appointment letter signed by the Head of School, the Policy Book applies to the employee only to the extent that the Policy Book is consistent with the appointment letter. In case of differences or inconsistencies, the employee's written appointment letter shall control.

No one is authorized to provide or execute an appointment letter, employment agreement, or special arrangement concerning the terms or conditions of employment unless the appointment letter, employment agreement, or arrangement is in writing and signed by both the Head of School and the employee.

C. Subject to Change

Practices, policies, benefits, and procedures at CA are subject to change and further development considering experience, changing demands of our operations, and government regulations. For this reason, CA's practices, policies, benefits, and procedures are under review on an ongoing basis and may be modified, altered, or eliminated at any time, with or without notice to employees, in CA's sole discretion.

We will attempt to keep employees up to date regarding changes that affect them. No member of the administration other than the Head of School and their designated representatives has the authority to change anything in the Policy Book or to make promises or commitments which conflict with, or are at variance with, the Employee Policy Book.

III. EQUAL EMPLOYMENT OPPORTUNITY AND NONDISCRIMINATION

A. Equal Employment Opportunity and Nondiscrimination

Colorado Academy prohibits discrimination and unlawful harassment in any of its programs, procedures, or practices on the basis of age, color, disability, national origin, ancestry, race, religion or creed, gender expression, sex, sexual orientation, gender identity, military service, marital status, genetic information, or other protected classifications defined by federal or Colorado laws. The policy applies in all aspects of employment with CA.

Colorado Academy is committed to fostering an inclusive, respectful, and equitable workplace. Employees are expected to engage in professional conduct that reflects cultural awareness, respect for differing identities, and openness to diverse perspectives. Employment decisions including hiring, evaluation, promotion, and compensation are based on qualifications, performance, and institutional needs.

B. Policy Against Bullying, Discrimination and Harassment

All employees are expected to treat all members of the CA community including, but not limited to, fellow employees, students, teachers, parents/guardians, guests, vendors, visitors, and volunteers, with respect. Prohibited conduct includes behavior that interferes with work performance or creates an intimidating, bullying, hostile, or offensive environment, whether verbal, physical, visual, social or electronic and will result in discipline or termination, regardless of whether the prohibited conduct constitutes harassment or discrimination under this policy. However, because of both CA's commitment to equal employment opportunity and its legal obligations, behavior which constitutes discrimination or harassment will be managed particularly severely.

1. Zero Tolerance

CA strives to provide a workplace free of bullying, discrimination, or harassment of employees by supervisors, co-employees and third parties. Bullying, discrimination, or harassment of any kind will not be tolerated and will result in discipline, which may include termination.

2. Bullying

Bullying is a form of behavior or conduct that is unwelcome to the reasonable person and has the purpose or effect of unreasonably interfering with an individual's work performance or has the purpose or effect of creating an intimidating, hostile, or offensive working environment. It is a form of harm (i.e., aggression, intimidation, embarrassment, threat, cruelty, offensiveness, insult, hurt, etc.) where there is a power imbalance; the person doing the bullying has power over the person being victimized. There are five main types of bullying:

- ***Physical:*** using physical force or aggression against another person (e.g., physical assaults, violence, unwanted touching, pranks, etc.)
- ***Verbal:*** using words to harm someone (e.g., name calling, intimidation, swearing, etc.)
- ***Visual:*** using images to harm or embarrass someone (e.g., signs, gestures, pictures, etc.)

- ***Social/relational:*** harming someone by excluding them, ignoring them, or spreading rumors (e.g., gossiping, causing reputational damage, etc.)
- ***Cyberbullying:*** using electronic media to harm someone (e.g., texting, social media, blogs, websites, videoconferencing, e-mail, etc.)

3. General Harassment

Bullying becomes unlawful harassment when the harmful behaviors described above are done in a discriminatory manner based on an individual's age (40 and over), race, sex, sexual orientation, gender expression, gender identity, color, religion or creed, national origin, ancestry, disability, genetic information, military service, marital status, or any other applicable status protected by federal, state or local law, and if:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; and/or
- Such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

4. Sexual Harassment

Colorado Academy prohibits sexual harassment and inappropriate sexual conduct. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; and/or
- Such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Employees are expected to always conduct themselves in a professional manner. Conduct which may violate this policy includes, but is not limited to, sexually implicit or explicit communications whether in:

- Written form, such as cartoons, posters, calendars, notes, letters, e-mail;
- Verbal form, such as comments, jokes, foul or obscene language of a sexual nature, gossiping, or questions about another's sex life, or repeated unwanted requests for dates; and/or
- Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another's body.

5. Procedure for Reporting

Any employee who believes they have been subjected to bullying, discrimination, harassment, or sexual harassment by any employee or person at CA should report the alleged conduct immediately to their division principal or department supervisor.

If reporting to a direct supervisor feels uncomfortable, or if the conduct continues despite a previous report, the matter should be directed to Human Resources.

Every report of perceived harassment will be investigated, and corrective action will be taken where appropriate. CA expects employees to make a timely complaint to enable the school to investigate and correct any behavior that may be in violation of the policy. All complaints will be investigated in a timely and impartial manner. All people involved in an investigation are required to maintain confidentiality about the matter to the greatest extent possible. However, it may not be possible to maintain complete confidentiality while conducting a complete investigation.

6. Retaliation

CA strictly prohibits any form of retaliation against individuals who report bullying, harassing, or discriminatory conduct or who cooperate in the investigation of such reports in accordance with this policy. Retaliation includes, but is not limited to, hostile or disparaging remarks, social exclusion, interference with job duties, or any other adverse conduct directed at a reporting party. Acts of retaliation are treated as a serious violation of CA policy, subject to immediate disciplinary action up to and including termination.

C. Communicable Disease and Contagious Illness Policy

Colorado Academy recognizes that serious communicable diseases and contagious illnesses contracted by employees including, but not limited to, HIV, tuberculosis, measles, COVID-19, etc., not only have a potentially tragic impact on those who contract them but also pose potentially significant and sensitive issues for the members of our school's community. Accordingly, we have established this policy for dealing with employment issues in connection with communicable diseases and contagious illnesses.

Employees who have contracted a serious communicable disease or contagious illness are encouraged (but not required) to inform Human Resources. An employee who has contracted a communicable disease or contagious illness will continue to work so long as they:

- Do not pose a substantial health risk to themselves, to students, or to any member of the school community;
- Are, with reasonable accommodation, able to perform the essential duties of their position. The Americans with Disabilities Act addresses the challenge of determining what constitutes "reasonable accommodation"; and
- Have not exhibited exclusionary symptoms in the last 24 hours without the assistance of medication, as per the Colorado Department of Public Health and Environment's "How Sick Is Too Sick?" document, which is available from the CA health team upon request.

In the event of an outbreak, CA will follow guidance from the CDC and Colorado Department of Health and Environment. For measles, such guidance states that all students and employees who are not vaccinated against or otherwise immune to measles, and/or are not able to produce a record of such vaccination, will be required to quarantine in their home for 21 days following the occurrence of the most recent case. Personal leave time must be used for this quarantine period, followed by unpaid leave for any remaining workdays once paid leave is exhausted.

All decisions concerning an employee's fitness for returning to work will be made on an individual basis by the Head of School in consultation with appropriate medical personnel.

Only people with a need to know shall have medical knowledge of a particular case. Human Resources, in consultation with the affected employee(s), will determine who will be informed and how to preserve confidentiality. All employees, whether they are officially informed or become aware of the situation through other means, will be expected to continue to work with the affected employee once the school has determined that the individual does not pose a threat to the health and safety of others. The affected employee should be treated with compassion and understanding. School employees will not harass or otherwise discriminate against this individual. Any employee who does not adhere to these requirements is subject to disciplinary action up to and including termination.

Colorado law requires the school to report certain diseases and conditions to the Colorado Department of Public Health and Environment for surveillance and disease control purposes. For more information about diseases and conditions that must be reported to the state, please visit ***https://www.colorado.gov/pacific/cdphe/report-a-disease***.

D. Accommodating Disabilities

It is the policy of CA to comply with the Americans with Disabilities Act ("ADA"), the Pregnancy Discrimination Act, and all applicable federal and state fair employment laws. When an employee notifies CA of a disability as defined in the ADA – including disabilities related to pregnancy, childbirth, and related conditions – that prevents the performance of one or more essential job functions, CA will provide reasonable accommodations to otherwise qualified individuals, unless doing so would create an undue hardship on the school

Employees seeking accommodations should contact Human Resources. Upon receiving a request, CA will engage in an interactive dialogue with the employee to determine the precise limitations of the disability and explore possible reasonable accommodations. Medical certification of the disability and/or of the need for accommodation may be requested. Employees are encouraged to suggest specific accommodations they believe would allow them to perform their job functions; however, CA is not required to provide the specific accommodation(s) requested and may offer an alternative accommodation, provided any such accommodation can be made without imposing an undue hardship on the school.

Questions regarding employee rights and responsibilities under the ADA, the meaning of terms used in this policy, or the application of this policy should be directed to Human Resources.

IV. COMPENSATION AND ATTENDANCE

A. Compensation

Colorado Academy seeks to provide competitive, fair, and equitable compensation aligned with its mission, financial sustainability, and market benchmarks. Compensation decisions are informed by role scope, experience, internal equity, and external market data for independent schools. Individual compensation adjustments are not guaranteed and remain at the discretion of the Head of School.

1. Pay Days

Pay day for all employees is the last business day of the month, or the preceding business day if the last business day of the month falls on a federal holiday. Electronic transfer of paychecks to a designated bank accounts is offered and encouraged as a convenience. A statement of earnings and deductions for each pay period and for the year to date is available online in Paycom for all employees. CA is required by law to make certain deductions from employee salaries for applicable taxes. Additional deductions for charitable contributions, employee-paid benefits, or other approved purposes may be requested through Human Resources.

2. Overtime Policies

a) Exempt Employee: An employee who is not eligible for overtime pay. This classification is determined by virtue of the level of autonomy, authority and responsibility defined in the job description. Faculty are exempt employees. All exempt employees are paid on a straight salaried basis. Exempt employees are normally not paid for time worked in excess of forty (40) hours in one week. However, solely at the discretion of the Head of School, time off or additional compensation may be granted where unusual time commitments are asked of exempt employees. If an adjustment is to be made, the adjustment must be made within the same pay period as the extra hours worked (within the same month).

b) Non-exempt Employee: An employee eligible for overtime pay. Non-exempt employees may be either hourly or salaried. Non-exempt hourly employees are required to submit timesheets at the conclusion of every pay period and are paid based on the actual number of hours worked. Non-exempt salaried employees are paid a fixed monthly salary. However, their pay will be adjusted upward for any overtime worked and downward for any unpaid leave or absences.

Non-exempt employees are eligible for overtime pay at one and one-half times their regular rate of pay for all hours worked in excess of 40 hours per workweek, in excess of 12 hours in a day, or in excess of 12 consecutive hours without regard to the starting and ending time of the workday. The regular rate of pay for hourly employees is their hourly wage. The regular hourly rate of pay for salaried non-exempt personnel is determined by dividing their regular annual salary rate by 2,080 (dividing by 52 weeks and again by 40 hours). Only actual hours worked are counted towards the qualification for overtime pay. Paid leave for any reason does not count towards meeting the qualification.

The established workweek for CA begins at 12:01 a.m. on Monday and ends at 12:00 midnight on Sunday. The monthly pay period for hourly non-exempt employees begins on the 22nd of the month and ends on the 21st of the month.

Regardless of the number of hours employees are scheduled or expected to work, all non-exempt employees are required to record all hours worked. All non-exempt employees must promptly and accurately report all time worked in the timekeeping system each pay period including all overtime worked. All supervisors are responsible for ensuring that all overtime hours worked by employees reporting to them are timely submitted to the business office. Overtime work must be approved by the budgetary head of the department and the CFOO.

Non-exempt employees will be compensated for all overtime worked, regardless of whether the overtime was approved in advance. However, failure to obtain advanced approval of the overtime may result in discipline of those responsible.

During busy periods, CA may require employees to work extended hours. Overtime is considered a condition of employment, and refusal to accept it when reasonable notice has been given is cause for disciplinary action up to and including termination.

If a non-exempt employee receives two different rates of pay for different job functions, overtime will be paid at a blended rate that is calculated in accordance with the Fair Labor Standards Act (FLSA).

3. Premium for Certain Weekends, Holidays, and Unscheduled Work

An hourly non-exempt employee who works on a Saturday, Sunday, or who is requested to return to the campus following the conclusion of their regular work period, will be compensated for the added service for the greater of the actual time worked or three (3) hours.

Hourly non-exempt employees will be paid twice their hourly wage for all pre-approved work performed on a school holiday. Moreover, an hourly non-exempt employee who works on a school holiday will be compensated at twice the hourly wage for the greater of the actual time worked or three (3) hours.

4. Teaching Faculty Salary Scale

Colorado Academy establishes a minimum base salary floor for teaching faculty to promote equity, transparency, and consistency while retaining flexibility to attract and retain exceptional educators. The minimum base salary is based on years of qualifying teaching experience and highest degree earned (i.e., Bachelor's, Master's, Doctorate). The salary scale represents the minimum compensation thresholds. Individual salaries may exceed the scale based on institutional needs, market conditions, role responsibilities, and performance.

Qualifying experience includes paid, lead instructional teaching in independent schools, public or charter school, and accredited international schools. Experience is credited on a year-for-year basis for full-time teaching roles.

2026-27 SALARY SCALE FOR 10-MONTH TEACHING FACULTY			
EXPERIENCE	**BACHELOR'S**	**MASTER'S**	**DOCTORATE**
1 to 5 years	$ 64,900	$ 66,900	$ 70,900
6 to 10 years	$ 73,300	$ 75,300	$ 79,300
11 to 15 years	$ 80,700	$ 82,700	$ 86,700
16 to 20 years	$ 88,700	$ 90,700	$ 94,700
21 to 25 years	$ 94,600	$ 96,600	$ 100,600
26 to 30 years	$ 97,500	$ 99,500	$ 103,500
31 to 35 years	$ 102,500	$ 104,500	$ 108,500
36 to 40 years	$ 108,900	$ 110,900	$ 114,900
41+ years	$ 110,900	$ 112,900	$ 116,900

Partial years of prior teaching experience may be credited on a prorated basis based on time and teaching load, subject to review by the Division Principal and Human Resources. For consistency and equity, years of service are credited based on the following table. For purposes of this calculation, "full-time" constitutes employment that included employee healthcare benefits (as required by law) and/or was at least thirty (30) hours per week on average:

TEACHING EXPERIENCE	FULL-TIME	PART-TIME
Full-Year Substitute Teaching	0.25	0.25
Long-Term Substitute (full term)	1.0	Prorated
Graduate Teaching	1.0	Prorated
Teaching Assistant (non-primary)	1.0	Prorated
Private Tutoring/Coaching/Lessons	0.25	0.25
Student Teaching (as part of education)	0.25	0.25

The minimum salary for any part-time teaching faculty is prorated to the nearest semester or trimester based on their teaching load for the year and may be further reduced to offset the value of full employee benefits for a faculty member who works less than a full load (e.g., fewer than five sections or 40 hours per week on average). Final determinations regarding credited years of teaching experience rest solely with the Head of School.

B. Attendance and Punctuality

Employees are expected to be present and on time during all scheduled working hours. In the event of an absence due to illness or emergency, the relevant division principal or department supervisor must be notified in accordance with departmental policies, and no less than one hour prior to the scheduled start time. Timely notification allows administration to arrange appropriate coverage and maintain continuity of operations.

Employees absent for three consecutive days without notifying their division principal or department supervisor may be considered to have voluntarily abandoned their position, and employment may be terminated accordingly. Repeated, excessive, or unreported late arrivals,

absences, early departures, mid-day departures from campus, or inappropriate use of sick leave may result in disciplinary action up to and including termination.

In the event of a prolonged absence, both Human Resources and the relevant division principal or department supervisor must be kept informed of the employee's circumstances and anticipated return date. Questions regarding attendance policies should be directed to the relevant division principal, department supervisor, or Human Resources.

C. School-Year Appointment Letters

Certain employees (e.g., exempt faculty) receive 10-month, 11-month, or other partial-year appointment letters ("School-Year Appointment Letter(s)") in which they are expected to work on campus during the school year and have a portion of summer off. Employees with School-Year Appointment Letters typically return to campus on or before mid-August Professional Days and begin summer break following the last Professional Day held at the end of the school year (typically during the week of Commencement); however, the exact start and end dates are at the discretion of the Division Head or Department Director. To support these employees with a steady stream of income and to retain employee benefits during the summers, exempt employees with School-Year Appointment Letters are paid evenly over a full twelve (12) months for the work performed during the school year. School-Year Appointment Letters are typically paid in arrears, with the first paycheck associated with a new School-Year Appointment Letter being paid on the 31st of August and continuing monthly through the 31st of July.

Although employees with School-Year Appointment Letters receive a summer break, these exempt employees are expected to do ongoing work to prepare for their classes in the next school year and, at times, they may be expected to participate in meetings or different professional development and training opportunities, identified by either the employee and/or divisional leadership, with the goal of preparing for the school year and keeping our faculty up-to-date with current teaching methods, practices, and any new knowledge in their respective fields. Depending on the program, such training may need to take place outside of normal working hours and/or in the summer months. Additionally, employees with School-Year Appointment Letters are expected to monitor email during summer months to ensure that they do not miss any essential information or requirements. That said, school leadership will make every effort to respect off-campus summer breaks in June and July for employees with School-Year Appointment Letters.

Appointment letters do not create an actual or implied contract; all CA employees are "at will".

D. Work Hours

1. Faculty

The primary occupation of CA students is academic study. The structures which support that study must be clearly defined, consistent, and orderly. The style which the faculty sets will be reflected in student response. All faculty are expected to arrive at school by 7:50 a.m.to be ready to welcome students to their classrooms, and they must be present at their division until at least 3:50 p.m.

Lower School class sessions begin at 8:00 a.m., Middle School class sessions begin at 8:05 a.m., and Upper School class sessions alternate beginning at 8:15 a.m. and 8:45 a.m.; the school day concludes at 3:20 p.m. for all divisions. The last twenty (20) minutes of the school day is a time when it will be appropriate to meet with students, to offer tutoring

where it is needed for a student in a particular class, to offer other kinds of support for which there is not time in the class day, and to collaborate with colleagues.

All faculty are expected to attend divisional meetings, committee meetings in which they have responsibilities, and other meetings called by the administration. Faculty are also expected to participate in Back-to-School Night. Meetings may be scheduled either before or at the end of the regular school day, but effort is made not to have both an early morning meeting and an afternoon meeting on the same day. Typically, no meetings will be held after 3:50, unless it is for a special committee, cohort, or training.

Additionally, working at an independent school comes with job expectations and responsibilities to assist with the school's recruitment, admission, and re-enrollment efforts; the operation and financial sustainability of the school depend on the enrollment of mission-aligned families. Typically, responsibilities occur during the school day such as when teachers host visitors in their classroom, provide feedback to the Admission Office, interview applicants, and welcome tours for brief class observations. After-hours commitments occur when employees serve on an Admission Committee, teach in a grade that hosts assessment events on weekends (i.e., Pre-K and Kindergarten applicant playgroups), and support the recruitment of prospective students and families to the school at admission events, such as Admission Preview, Athletics Open House, and Accept/yield events. Exempt employees with School-Year Appointment Letters are expected to support a reasonable number of admissions and other events throughout the school year which, at times, may fall outside of normal work hours as further defined below.

2. Staff

The normal workday and week for full-time staff is eight and forty hours, respectively. A typical workday for administrative staff begins at 7:45 a.m. and ends at 4:15 p.m. with a half-hour lunch break, Monday through Friday. Staff should consult their supervisor about the workday hours applicable to their function.

E. School Holidays

1. Eligibility

Eligibility for school holiday compensation will be effective on the date of employment. Temporary employees and employees who work fewer than twenty (20) hours per week will not be eligible for holiday compensation. Those who normally work less than forty (40) hours per week, but at least 20 hours per week, will receive holiday pay based on an average number of hours worked during a regular workday. Holiday pay is not considered time worked in the computation of overtime pay. If eligible nonexempt employees work on a recognized holiday, they will receive holiday pay plus wages at their straight-time rate for the hours worked on the holiday.

2. Paid Holidays

The school observes the following paid holidays, which vary based on role. CA may remain open for business which is a regular workday for 12-month staff and administrators. When CA is closed for business (e.g., federal holidays), eligible employees will be paid for the holiday. Specific paid holiday dates for most employees are as follows, and variations to this schedule will be communicated by a direct supervisor.

2026-27 PAID HOLIDAYS	SCHOOL-YR APPOINTMENT		12-MONTH EMPLOYEES	
	DATES	DAYS	DATES	DAYS
Labor Day	9/7/26	1	9/7/26	1
Fall Break	10/1/26 - 10/2/26	2	10/1/26 - 10/2/26	2
Thanksgiving	11/23/26 - 11/27/26	5	11/23/26 - 11/27/26	5
Winter Break	12/21/26 - 12/31/26	9	12/21/26 – 12/25/26	4
New Year's Day	1/1/27	1	1/1/27	1
Martin Luther King, Jr. Day	1/18/27	1	1/18/27	1
February Break	2/12/27	1	N/A	-
Presidents Day	2/15/27	1	2/15/27	1
Spring Break	3/22/27 - 3/29/27	6	N/A	-
April Break	4/23/27	1	N/A	-
Memorial Day	5/31/27	1	5/31/27	1
Juneteenth (observed)	N/A	-	6/18/27	1
Independence Day (observed)	N/A	-	7/5/27	1
TOTAL PAID HOLIDAYS		**29**		**18**

3. Additional Days

Additional paid holidays may be designated by the administration for certain divisions or departments. The designation, if any, will be made annually after consideration of the calendar and will be communicated accordingly.

4. Adjustments to Paid Holidays

When a holiday falls on a Saturday or Sunday, either the preceding Friday or following Monday will be designated as the paid holiday. A holiday that falls during an employee's vacation period will not be counted as part of the vacation taken. Occasionally it will be necessary for certain employees to work on CA's observed holidays as provided above, based on the nature of the job description and the needs of the school. Non-exempt employees will be paid double time. Exempt staff may take a flexible holiday at any time agreed-upon between the employee and supervisor. Exempt faculty with a 10- or 11- month School-Year Appointment Letter may have their appointment adjusted to reflect the additional required working days.

5. Accommodation of Religious Holidays

Employees who wish to take time off for a religious observance that is not one of CA's Paid Holidays may use vacation time or an approved personal day to do so. In the event an employee does not have vacation time or a personal day available and wishes to take time off for a religious observance, they may request the day off without pay. In either case the employee must request and obtain prior approval from their supervisor using the Paycom HR system.

6. Pre- and Post-Holiday Absences

To provide consistency for our students, employees with School-Year Appointment Letters are typically not allowed to be absent preceding and following school holiday periods, particularly when school is in session.

F. Personal Days

Employees on a ten (10) or eleven (11) month School-Year Appointment will receive up to two (2) personal days each academic year. Two days will be credited at the start of the school year in August with unused days rolling over from year to year with a maximum balance of two (2) days. Personal days are for use at the employee's discretion, with a supervisor's approval; employees are not required to provide a reason for personal days. Teaching faculty's personal days must be requested and approved in advance using the ReadySub system; all other employees should request these days in the Paycom HR system. Unused personal days will be paid out upon separation from employment.

G. Vacations

1. Exempt 12-Month Employees

All full-time, exempt 12-month employees (excluding those with a School-Year Appointment Letter), accrue thirty (30) days of paid vacation each year, beginning with the first year of employment. Vacation time is earned on a pro rata basis each month worked. Employees do not earn vacation time while on a leave of absence. Those employees who normally work less than full-time (forty hours per week) but more than twenty hours per week will earn vacation time based on the actual hours worked during a pay period.

2. Non-Exempt Employees

All non-exempt staff employees who work more than twenty (20) hours per week will earn paid vacation days monthly on a pro-rata basis; employees who have a School-Year Appointment Letter do not accrue vacation time. The number of vacation days earned by full-time, non-exempt staff employees is based on years of continuous service as follows:

- 1 through 5 years of service: 15 Vacation days per year or 1.25 days per month
- 6 through 10 years of service: 20 Vacation days per year or 1.67 days per month
- 11 or more years of service: 25 Vacation days per year or 2.08 days per month

3. Scheduling and Approval

Employees are encouraged to use earned vacation time during periods when school is not in session. All vacation requests must be submitted and approved by the employee's supervisor through the Paycom HR system prior to the first day off. A request for time off should be made at least two days in advance of the start of the leave period.

4. Accumulation

Vacation time can be accumulated up to a maximum of twenty-five (25) days (200 hours for a 40-hour per week employee). Employees are not eligible to earn any additional vacation time once they have reached a maximum of 25 days until they use all or a portion

of their earned vacation. Accrued but unused vacation is paid out upon termination of employment.

H. Remote Work

Remote or hybrid work arrangements are limited (no more than one day per week), discretionary, and role-dependent, and approval is based on operational needs, performance, and departmental consistency. CA prioritizes in-person presence to support students, collaboration, and community.

Certain administrative offices (e.g., Admission, Development, Business Office) may offer partial remote work schedules (no more than one day per week) based on the role, time of year, and with appropriate schedule staggering to have a consistent in-person presence in each department. Partial remote work arrangements must be approved by the department director in advance and are contingent upon keeping with a workstyle of accessibility, communication, and productivity during work hours (as further defined below). Employees pre-approved for partial remote work must be available via phone and email throughout the normal workday and may be required by a supervisor to come to campus on a day they are typically scheduled to work remotely (e.g., meetings, in-service, orientation). Employees are expected to devote their full attention to the job when working remotely; remote work must not be used as a substitute for childcare.

Temporary exceptions allowing fully remote work may be made for short periods of time to accommodate illness, quarantine, or temporary disability, where possible based on the role, and in consultation with the employee's supervisor and Human Resources. Remote work arrangements may be modified or revoked at any time to meet school needs. Disputes or inconsistencies regarding remote work approval should be directed to Human Resources.

Approved remote workdays are considered regular workdays and subject to the same availability, performance, and attendance expectations as on-campus work.

I. Summer Compressed Work Weeks for Administrative Staff

During the summers when school is not in session, certain Administrative Staff (e.g., Admission, Development, Business Office, Technology, Administrative Assistants, etc.) may work a 4-day compressed work week of 34 hours, either over four 8.5-hour days or spread Monday through Friday. Hourly and salaried non-exempt employees may also work a compressed work week but will only be paid for hours actually worked. Compressed work weeks are at the discretion of the Department Director based on the needs of the school/department and are only allowed if at least one departmental employee is present each day with appropriate schedule staggering to have a consistent in-person presence in each department, Monday through Friday. Certain tasks, events, meetings, or other responsibilities during the summer may necessitate a normal five-day work week or other schedule adjustments; these changes are also at the full discretion of the Department Director.

J. Emergency School Closures or Delays

When the school must be closed or delayed due to unforeseen emergencies (e.g., inclement weather, government mandate, utilities outage, etc.), CA administration will determine the appropriate operating schedule for the day and will make every effort to report closures or delays by 4:00 AM to provide ample advanced notice to employees, parents/guardians, and students; these communications will be sent to all appropriate constituents via text message and email. Emergency

closures, paid leave, and statutory leave programs operate concurrently as applicable. Human Resources determines coordination.

If the school is open during inclement weather, employees unable to report to work because they believe they cannot safely reach the campus are encouraged to stay home. Employees who do not report to work when the school is open will be required to use available leave. If an employee does not have available leave, there may be adjustment to their compensation (i.e., unpaid leave) for the day(s) missed.

When weather conditions or other circumstances permit a safe, delayed start to the school day, CA will operate on a two-hour delay. Employees are expected to arrive at school by 9:30 AM. Exceptions apply to ECE teachers (as noted below) and critical food service and facilities staff; the direct supervisor of these departments will notify these individuals of their earlier start times. When there is a two-hour delay, buses will conduct their regular morning routes on exactly a two-hour delay. Student drop-off will occur no earlier than 9:50 AM and before-care will not be offered. The school day for all divisions will start exactly two hours after the normal start time; lower school students will report to their classroom and middle and upper school students will report directly to their advisories.

When school is officially closed, employees in emergency response positions must report to work and will be compensated for a regular workday; non-exempt employees will also receive their regular hourly compensation for the actual hours worked or a minimum of 3 hours, whichever is greater. Employees who work at least twenty (20) hours per week (other than those in emergency response positions) will be compensated for the average number of hours worked during a regular workday when school is officially closed.

If the school must be closed for an extended period (beyond five days), employees may be required to work in a virtual/remote environment as the job functions permit and at the discretion of school administration. Employees who are unable to work remotely, due to the nature of the position, job description, and/or access to technology, are expected to be accessible by phone and email during normal operating hours and should respond within 24 hours. If an extended school closure necessitates staffing reductions, Human Resources will notify the affected employees of any layoffs, furloughs, or terminations in writing.

V. PAID TIME OFF

Colorado Academy intends to provide a method of furthering the health and general welfare of employees and of establishing standards to ensure maximum and reasonable job attendance. Therefore, school-provided paid time off should not be viewed as a permissive level of absence to be taken whenever desired. CA will keep records for a period of at least two years documenting the hours worked and leave accrued and used by each employee.

A. Employee Notification

Employees unable to report to work are required to notify their division principal or department supervisor with as much advanced notice as possible so that appropriate arrangements for coverage can be made. Employees who must leave work must likewise notify their division principal or supervisor.

Time off, for any reason other than illness, must be approved in advance by an employee's division principal or department supervisor. A request for time off may be denied when the employee's presence on the job at a particular time is necessary for the safety of our students or is otherwise critical. All employee absences due to paid sick leave or personal days must be reported in Paycom; additionally, faculty must request a substitute through the Ready Sub system.

B. Sick Leave

Employees can use sick leave for the following safety or health needs:

- A mental or physical illness, injury, or health condition that prevents work, including diagnosis or preventive care;
- Domestic abuse, sexual assault, or criminal harassment leading to health, relocation, legal, or other service needs;
- Has a family member experiencing a condition described in (1) or (2) above;
- Needs to grieve, attend funeral services or a memorial, or deal with financial and/or legal matters that arise after the death of a family member;
- Needs to care for a family members whose workplace, school or place of care has been closed due to a public health emergency, inclement weather, loss of utilities or another unexpected occurrence; or
- Needs to evacuate their home due to inclement weather, loss of utilities, or another unexpected occurrence.

Extended absences related to an employee's illness or injury, or the illness or injury of an employee's immediate family member will run concurrently with leave provided by the Family and Medical Leave Act.

1. Accruals

All full-time twelve-month employees will accrue sick time at the rate of eight (8) hours per month. Employees who work less than full-time will accrue paid sick leave at a rate of one (1) hour per thirty (30) hours worked.

Full-time employees with ten-month School-Year Appointment Letters receive a full allotment of eighty (80) sick leave hours at the start of each school year. Full-time employees with eleven-month School-Year Appointment Letters are credited eighty-eight (88) paid sick leave hours.

All employees may carry over unused paid sick leave each year for up to a maximum balance of eighty (80) hours. Employees are not entitled to payment for unused sick leave upon termination of employment.

2. Certification

After the fourth consecutive day of absence due to illness or injury, or in cases where frequency of intermittent absences impairs the capacity of the school to function properly, the school requires a doctor's note confirming the illness or injury of the employee, stating that the absence from work is a medical necessity, identifying the date when the employee may return to work and whether there are any restrictions or accommodations requested upon return to work.

3. Public Health Emergency

If a public health emergency is declared due to a communicable disease, employees may be entitled to supplemental sick leave in accordance with city, state, or federal law. In these cases, supplemental leave must be used to quarantine/self-isolate, seek medical diagnosis, or seek preventative medical care for the communicable disease that caused the public health emergency, or to care for immediate family members who must quarantine/self-isolate, seek medical diagnosis or seek preventative medical care for the communicable disease that caused the public health emergency. Supplemental sick leave may also be used if CA or the school or place of care of an employee's child has been ordered closed by a public official due to a public health emergency.

C. Bereavement Leave

Full-time employees who have completed three months of employment may receive up to four (4) days' leave with pay because of a death in the employee's immediate family, with the approval of a supervisor. For purposes of this benefit, immediate family includes a spouse, civil union partner, children, parents, stepparents, stepchildren, parents-in-law, brothers, sisters, brothers/sisters-in-law, son/daughter-in-law, grandparents, grandchildren, grandparents-in-law, aunts, uncles, nieces, and nephews.

D. Faculty Professional Leave

From time to time, a faculty member may request or be asked to take time away from their teaching assignments in order to undertake, with the approval of the division principal, a project designed to enhance the teacher's skills, to visit another school, to represent the school, or in some other way to occupy themselves in a manner which the Principal deems to warrant an absence from the teaching assignment. Compensation is not affected by approved faculty professional leave.

E. Military/Reserve Duty

1. Unpaid Military Leave

Employees will be given unpaid leave for any period during which the employee is in the service of any of the Uniformed Services of the United States of America, as defined by the Uniformed Services and Employment and Reemployment Rights Act of 1994. Each employee may receive at least five years of unpaid military leave during their career at CA. This leave is available regardless of whether the employee enters the service voluntarily or involuntarily.

To receive military leave, the employee must notify CA before their departure that they will be absent for military duty. This requirement will be waived if prevented by military or another exigency. Employees on military leave may elect to use any portion of their accrued vacation days while on leave, to receive pay for the applicable period. However, the employee should inform Human Resources of the dates s/he wishes to take as vacation on or before the dates in question.

During the first twelve weeks of military leave, CA will continue to provide the same insurance benefits that were provided to the employee immediately prior to commencement of the leave. The employee will continue to be responsible for payment of their share of insurance premiums, if any. If the employee remains on military leave after the expiration of this twelve-week period, they must elect whether to continue insurance coverage at their own expense, under a program like COBRA. If concerned about an inability to make this election upon expiration of the twelve weeks, such as because of unavailability in the field, the employee should arrange with Human Resources before departing on leave.

The entire period of military leave will be counted as service at CA for purposes of determining seniority (for example, for purposes of determining the rate at which the employee accrue vacation). Vacation and sick leave will continue to be accrued during the first twelve weeks of military leave (subject to the maximums set forth elsewhere in this Policy Book), after which they will no longer accrue.

The statutory provisions regarding reemployment of people returning from military leave are complex and cannot be set forth here in their entirety. However, CA is committed to complying with all relevant laws.

When applying for reinstatement, the employee must present their orders or other proof of service and discharge papers or other documents reflecting the date and circumstances under which the period of military service ended, unless those documents are not then available, in which case they must be presented as soon as available.

2. Military Leave with Differential Pay

Employees with greater than six months seniority who are members of the United States Reserves or National Guard will receive up two weeks of military leave with differential pay per year, to be used during periods in which the employee is in full time service with the Reserves or National Guard (typically, the annual two weeks of encampment training). For this two-week period, CA will pay the employee the difference between their ordinary wages or salary and the pay they receive from the military for the same period, excluding only quarters allowances.

To receive military leave with differential pay, the employee must notify CA of the dates required for the leave as early as possible. Upon returning to work, the employee must provide CA with both a copy of their orders for the leave period and statements reflecting the military pay and allowances received during the leave period. Leave may not begin before or extend after the period during which the employee is on full time duty with the Reserves or National Guard. Military leave with differential pay is not available for weekend duty.

An employee can elect to apply accrued vacation to any portion of leave while fulfilling their Reserves or National Guard obligations. However, the employee will not receive both vacation pay and the pay differential. Rather, any periods for which accrued vacation is utilized will be treated as unpaid military leave and will not be counted against the two weeks of eligibility for military leave with differential pay.

F. Jury Duty

Upon receipt of subpoena or summons, an employee must immediately notify their supervisor and provide a copy of the subpoena or summons. While we encourage employees to serve, there may be times when there is conflict with CA's needs. Accordingly, we may suggest that the employee request the Court to reschedule service at a more convenient time. Employees will be granted leave for the duration of jury or witness duty, and time spent on jury duty will not be charged against vacation time or sick days.

A full- time employee may receive pay for up to 10 days of witness or jury duty. Part-time employees will receive compensation for the hours they were scheduled to work during the first ten days of their jury service. In addition, the employee may retain the Court's payment for jury or witness service. During such duty, the employee is expected to report to work whenever possible. Also, the employee may be required to submit verification of the date and time of each appearance to Human Resources.

G. Voting

Upon request, employees shall be entitled to be absent from work for two hours to vote in an election, at the beginning or end of the work shift. However, when mail-in voting is available, CA requests that employees minimize disruption to the school day whenever practical.

H. Discretionary Leave

CA cannot anticipate all personal or professional circumstances which might arise and cause an employee to seek a leave of absence. Accordingly, division principals and department directors have discretion to consider requests for leave which do not fall within the categories set forth above. Requests for discretionary leave should be made as far in advance of the requested start of the leave as possible. A discretionary leave of absence will only be granted in exceptional circumstances and ordinarily will be unpaid. In addition to granting or denying requests for discretionary leave outright, division principals may grant requests in part or condition any grant of discretionary leave on terms they deem appropriate under the circumstances.

Employees may be required to pay the full cost of their insurance benefits while on discretionary leave, and will not accrue seniority, vacation, or sick leave while on leave. If the school continues to pay its share of premiums for the employee during unpaid leave, the employee will be required to reimburse the school for those premiums if she or he is unable to return to work at the scheduled

conclusion of the leave. Rarely will an employee be granted discretionary leave for longer than twelve weeks.

If an employee granted discretionary leave is unable to return at the scheduled conclusion of the leave, their employment will be terminated. Under extraordinary circumstances, CA may attempt to hold the employee's position open for a period and reinstate the employee when they are able to return. Positions can only be held open with the approval of the Head of School, who has complete discretion to decide whether and for how long to do so.

I. Colorado's Family And Medical Leave Insurance (FAMLI)

The state of Colorado has enacted paid FAMLI benefits in accordance with the Family and Medical Leave Act (FMLA). FAMLI provides partial income protection for eligible employees who are temporarily unable to work due to their or a family member's qualifying medical or legal reason, specifically, for the care of a newborn, adopted child, or fostered child; to care for a family member with a serious health condition; for the employee's own serious health condition; for qualifying military exigency leave; or to address safety needs or the impact of domestic violence and/or sexual assault. FAMLI provides partially paid leave, paid by the state of Colorado, for up to twelve (12) weeks or sixteen (16) weeks under certain circumstances related to pregnancy and childbirth.

Contributions to the state FAMLI fund are a shared responsibility between the employer and the employee. Therefore, CA remits the full 0.88% of the employee's wages to the FAMLI fund in accordance with the law and regulations, half of which is a payroll deduction of 0.44% from the employee's earned wages taken from each paycheck, with CA contributing the other half (0.44%) on the employee's behalf.

FAMLI wage replacement benefits will be paid at a rate between 60% and 90% of the employee's average weekly wage with lower wage earners receiving a higher percentage. Benefits are calculated on a sliding scale using the individual's average weekly wage from the previous five calendar quarters in relation to the average weekly wage for the state of Colorado and may increase over time. State benefits are capped at $1,381.45 per week. However, for eligible employees who have been employed by CA for at least one full year, CA will "round up" to 100% of average weekly wages for employees that qualify for FMLA and FAMLI, making up for any gap between 100% of the employee's average weekly wages less the gross amount received from the state through FAMLI. Eligible employees are not required to use sick, personal, or vacation time to receive the "rounded up" 100% of their base salary or wages while receiving FAMLI payments.

The benefits under FAMLI can only be taken once per year across a rolling annual calendar year. FAMLI leave runs concurrently with FMLA and is subject to similar rules regarding health benefits, job protection, notice, and special rules for schools. Contact Human Resources for more information on Colorado's state FAMLI program.

1. Health Benefits While on FAMLI

CA will maintain group health insurance coverage for an employee on family and medical leave on the same terms as if the employee had continued to work. For insurance to continue, employees must continue to pay their share of health insurance premiums while on leave through payroll deduction or by sending payments to Human Resources no later than the 10th day of the month. Failure by the employee to make payments may result in cancellation of coverage or, if CA pays the employee's share of the premiums, CA will recover the cost of these payments from the employee at the end of the period of leave.

An employee will be financially responsible for the medical insurance premiums paid on that employee's behalf while on leave (including the portion of premium ordinarily paid by CA), if the employee fails to return to work after a leave under this policy for reasons other than the continuation, recurrence, or onset of a serious health condition, or other circumstances beyond the employee's control.

2. Job Protection

If an employee has worked at CA for at least 180 days before taking FAMLI leave, upon return from FAMLI leave, an employee will be restored to their original job, or to an equivalent job with equivalent pay, benefits, and other employment terms and conditions, without loss of seniority, in accordance with state and federal law. However, if the period of leave encompasses the beginning of a new academic year, a decision of whether to retain the employee will be made as set forth in the appointment letter. The fact the employee is on leave will not be considered when making this decision. If a decision is to terminate employment, then the employee's employment will terminate on the last day of the academic year, or as otherwise provided in the appointment letter.

An employee's use of FAMLI will not result in the loss of any employment benefit that the employee earned or was entitled to before using this leave. However, seniority as well as benefits such as vacation, personal, and sick leave days do not accrue during the leave period. Under limited circumstances, CA may be entitled to replace rather than reinstate certain highly paid "key" employees after using leave under this policy.

3. Special Rules Applicable to Schools

When an instructional employee requests leave which extends into the final weeks of a school year, CA may require the employee to extend their leave through the end of the term. This may apply, at CA's sole discretion, if:

- the leave is at least three weeks long and the scheduled return would occur during the last three weeks of the term;
- the leave begins within the final five weeks of the term, lasts longer than two weeks, and is scheduled to end during the last two weeks of the term; or
- the leave begins within the last three weeks of the term.

If an instructional employee requests intermittent leave which will require the employee's absence for more than twenty percent of scheduled work hours, CA may require the employee to instead take full, non-intermittent leave for that period of time. In the alternative, the school may require the employee to transfer into another position in which it can better accommodate the intermittent leave (with equivalent pay and benefits). If leave extends into a period during which the employee is not required to report for work, that period will not be counted against the twelve-week limit. For more information regarding these rules, see Human Resources.

J. Misuse of Leave

Misuse of leave is not tolerated by CA. Leave benefits are intended solely to provide income protection in the circumstances set forth in this policy and may not be used for any other reason. In any case where the school determines, in its sole discretion, that an employee is misusing or

abusing their leave benefits including, but not limited to, using sick or personal leave to extend vacations or school holidays, the employee may be subject to disciplinary action up to and including termination of employment.

VI. EMPLOYEE BENEFITS

Various employee benefits and insurance programs are available to employees of Colorado Academy, if qualifications for participation and required contributions (where applicable) are met. These programs are not available to temporary or seasonal employees. The sections that follow are designed to provide helpful information with respect to each program. Except as otherwise noted below, an employee's eligibility for participation in the health, dental and vision insurance programs require a time commitment of 75%, or at least thirty (30) hours per week on average. Participation begins the first day of the month following the date of hire, or the first of the month if employment begins on the first workday of a month. Coverage ends on the last day of the month following termination.

Please be aware that the benefits described in this section may change or be discontinued at any time, with or without notice. Employees are encouraged to visit ***coloradoacademybenefits.com*** for detailed information on all of CA's benefits offerings. In the event of any conflict between the language of this Policy Book and the actual terms of any plan document in effect at CA, the plan document will control.

A. Medical, Dental, and Vision Insurance

CA provides health insurance coverage through the Independent School Benefits Consortium (ISBC) for employees and their dependents with a variety of coverage options with differing premium costs for employees. Pre-existing condition limitations do not apply. Currently, CA covers 100% of employee-only medical premiums for the base-level High-Deductible Health Plan (HDHP). Dental and Vision Insurance benefits are also available on a voluntary basis to employees and their spouses and dependents; premiums for dental and vision insurance are paid by the employee through a payroll deduction.

Health benefits participation must be elected within thirty (30) calendar days of the date of hire; otherwise, enrollment will be deferred until the next open enrollment date (typically in November each year). Special enrollments are allowed at other times for specific life events as defined by federal regulations.

Employees who voluntarily terminate employment with CA, have twenty (20) or more years of continuous employment with CA and are at least 63 ½ years old at the time of termination are eligible to continue health coverage on CA's group health plan at a reduced rate.

B. Cafeteria Plan

CA offers flexible compensation plans under the provisions of Internal Revenue Code Section 125 as the vehicle for delivery of its health insurance, health care expense reimbursement, and dependent assistance reimbursement plans (collectively, the "Cafeteria Plan"). The Cafeteria Plan includes a Health Savings Account (HSA) for participants in a high-deductible health plan and a Flexible Spending Account (FSA) for medical, limited purpose medical, and childcare expenses. Cafeteria Plans allow employees who work at least a half-time commitment (20 hours per week) to direct a portion of their otherwise taxable salary into three separate areas of non-taxable benefits:

- Payment of the health, dental, and vision insurance premiums;
- Direct reimbursement for out-of-pocket and uninsured medical and dental care expenses; and/or
- Direct reimbursement for eligible dependent care expenses, as regulated by the IRS.

C. Supplemental Accident, Hospital, and Critical Illness Insurance

Employee-paid supplemental insurance coverage is available for employees and eligible dependents. Employees may elect to enroll in each plan on an individual basis. Participation must be elected within thirty (30) calendar days of the date of hire, otherwise enrollment will be deferred until the next open enrollment date. Special enrollments are allowed at other times for specific life events as defined by federal regulations. Coverage may be portable upon separation of employment.

D. Life and Accidental Death and Dismemberment (AD&D) Insurance

Employer-paid group term life insurance in the amount of two times the employee's annual salary, up to policy-defined limits, and a schedule of indemnification for loss of sight or accidental dismemberment is paid for by CA for eligible employees. The effective date of participation is the first day of the month coincident with or next following date of hire.

Participation must be elected within thirty (30) calendar days of the date of hire, otherwise enrollment will be deferred until the next open enrollment date. Special enrollments are allowed at other times for specific life events as defined by federal regulations, and half-time commitment is necessary for participation.

E. Voluntary Life Insurance

Employee-paid group term life insurance is available for employees and eligible dependents. Participation must be elected within thirty (30) calendar days of the date of hire, otherwise enrollment will be deferred until the next open enrollment date. Special enrollments are allowed at other times for specific life events as defined by federal regulations, and half-time commitment is necessary for participation. Coverage may be converted to an individual plan upon separation, contact Human Resources for more information on portability.

F. Long-Term Disability Insurance

CA pays for long-term disability insurance to provide eligible employees with 65% of salary income (up to a maximum of $8,500 per month) during periods of extended disability arising from illness or accident. There is a 90-day elimination period before payments begin, and they will continue for the duration of total disability to age 65. Additionally, during the period of disability where applicable, CA's contributions to the employee's retirement program are continued at the level in effect at the time of disability. The effective date of participation is the first day of the month coincident with or next following date of hire. A 75%-time commitment is necessary for participation.

Participation must be elected within thirty (30) calendar days of the date of hire, otherwise enrollment will be deferred until the next open enrollment date. Special enrollments are allowed at other times for specific life events as defined by federal regulations, and half-time commitment is necessary for participation.

G. Workers' Compensation

If an employee is injured on the job, the employee must immediately report the injury to both their supervisor and Human Resources to maintain the rights and benefits available to the employee under the workers' compensation statutes. Injuries connected with employment are subject to the provisions of workers' compensation statutes. An employee who is injured while on the job must

report that injury immediately to their supervisor and to Human Resources within twenty-four (24) hours of the occurrence of the injury. Colorado state law requires timely filing of reports when employees sustain injury in connection with their employment. Failure to file the required report subjects CA to penalties and can result in the denial of benefits to the employee.

To qualify for Workers' Compensation coverage, employees are required to first seek medical care through one of CA's approved clinic sites. After the first three days of absence following a work-related disability, eligible employees will receive up to two-thirds' income replacement benefits from our workers' compensation insurance carrier, in accordance with Colorado state law. Absences related to an injury covered by worker's compensation will run concurrently with leave provided by the Family Medical Leave Act.

H. Retirement Plan

Eligible employees of CA participate in the Independent School Group Retirement Plan ("Retirement Plan"). The Retirement Plan is a multiple-employer defined contribution plan, and employees are immediately vested in employee contributions to the plan and will become fully vested in employer contributions after two years of continuous service to CA. Employees are required to work at least twenty (20) hours per week, and 1,000 hours per year, to be eligible to participate in the Retirement Plan. Once an employee becomes eligible to make contributions, they remain eligible regardless of hours worked in the future; however, they must work at least 20 hours per week to receive employer contributions as defined below. A full Summary Plan Description (SPD) is available on the faculty resource board.

CA's contributions to the Retirement Plan on behalf of the employee begin on the first of the month following the date of hire and is a percentage of annual salary based on the number of years of employment with CA. The contribution rate graduates from 6% to 10% according to the following schedule:

- Years 1 through 7: 6% of eligible compensation
- After year 7: 7% of eligible compensation
- After year 8: 8% of eligible compensation
- After year 9: 9% of eligible compensation
- After year 10: 10% of eligible compensation

Employees are not required to contribute to receive the school's contribution, but employees who work 1,000 or more hours per year may make voluntary contributions to the Plan within guidelines established by the IRS.

I. Admission and Financial Aid for Children of Employees

The intent of Colorado Academy's admission policy is to achieve the proper balance among all stated priorities in a particular section, grade, or division of the school. In no particular order, these admission priorities include class gender balance, qualified siblings, qualified employee children, applicants with varied interests, talents, and experiences, and applicants from diverse social, economic, racial, ethnic, and cultural backgrounds. Priorities are statements of desirability that when achieved in balanced representation, fulfill the broad outlines of admission policy. In other words, admission of employees' children is a priority but is not guaranteed.

CA's financial aid program as determined by Board policy gives priority of available funds to children of full-time, full-year employees. Each year, employees interested in applying for financial aid must complete all steps of the financial aid application process by the deadlines, as outlined by the school. Each year, children of employees must also meet re-enrollment criteria.

For purposes of this policy, full-time is defined as employees who work 40 hours per week on average (i.e., 100% load for faculty); full-year is defined as being employed for the entirety of the school year for faculty (i.e., 10- and 11-month appointments) and twelve months for staff. All other things being equal and where funds are available, children of full-time, full-year employees are awarded financial assistance under the following conditions.

- Before a student is considered for a financial aid grant, the parent/guardian is required to complete the admission process during the regular admission season, with final review for acceptance by the Admission Committee.
- For newly admitted or re-enrolled children of full-time, full-year employees who choose not to apply for financial aid, or who do not qualify for assistance, the tuition obligation will be reduced by 50% ("Tuition Remission"). In the event an admitted child has two parents/guardians employed full-time at CA, only one 50% tuition remission per child is allowed.
- For newly admitted or re-enrolled children of full-time, full-year employees who choose to apply for financial aid and who qualify for assistance, the expected tuition obligation, as determined by the Clarity platform and the judgment of CA's Financial Aid Committee, will be further reduced by 50%. Employees who choose to apply for financial aid must meet the stated deadline for submission of all documents.
- Tuition Remission is an employee benefit that will be prorated if an employee ends employment with CA while their child remains enrolled. If the employee terminates employment prior to the end of the school year, the Tuition Remission benefit will be prorated based on the number of school days during the year that the student's parent/guardian was actively employed at CA. Any additional tuition owed upon termination (i.e., cancellation of prorated Tuition Remission) is due in accordance with the non-employee monthly payment schedule.

Children of temporary, seasonal, or part-time employees (i.e., working less than 40 hours per week on average) do not receive the 50% tuition reduction but may still be considered for financial assistance through the financial aid process.

J. Child Care Assistance Subsidy

CA offers a reimbursable child care assistance subsidy to employees with qualifying child care for eligible dependents (up to age five), such as biological child, stepchild, adopted child or any child for whom the employee is the court appointed guardian. Employees whose children are enrolled in CA's Early Childhood Education (ECE) program are not eligible for this subsidy, since CA's ECE program is already offered at below-market rates.

Eligibility for the child care assistance subsidy requires an employment commitment of 75%, or at least thirty (30) hours per week on average. CA will pay up to two-hundred dollars ($200) of qualifying child care services per each month per eligible dependent for full-time employees (i.e.,

40 hours per week). Employees working between 30 and 40 hours per week on average will receive a prorated subsidy. Charges for registration, late fees, or other one-time expenses are excluded from reimbursement. Subsidies paid by CA are a taxable benefit to the employee and will be reported as such on IRS Form W2.

K. Discounted Auxiliary Programs

CA offers a range of auxiliary programs, including summer camps, after-school care, Lower School athletics, and enrichment opportunities, at market rates. Children of full-time CA employees are eligible to participate in these programs, typically at a 50% discounted rate. In circumstances where employees are required by a supervisor to remain on campus beyond regular work hours for meetings or other work-related obligations, the discounted program fees for that day may be waived at the discretion of School Leadership. Additionally, CA summer camp employees whose students attend summer camp will receive a 50% discount during the days they are working in summer camp.

L. Mental Health Support

CA provides mental health resources for all employees through Spring Health. Spring Health provides up to six counseling or coaching sessions at no cost to each employee and each of their household members. Additional sessions beyond the six may be added and paid for by the employee. Additional sessions may be eligible for coverage under a medical insurance plan; however, it's the employee's responsibility to verify in-network coverage prior to extending care. Any charges beyond the six free sessions are the sole responsibility of the employee.

Employees participating in CA's medical plan also have access to unlimited mental health counseling sessions offered through the ISBC Health Hub. For more information, visit ***coloradoacademybenefits.com***.

VII. GENERAL WORKPLACE POLICIES

A. Right to Access

CA has the right, at its discretion, at any time to search and/or access the information or items contained within all CA-owned property and equipment and including, but not limited to:

- Desks, closets, files, offices, workstations, and any other property of CA;
- Any information which is electronically stored or transmitted over CA's network, services, equipment, devices, computer systems, or off-site cloud locations;
- Messages sent or received using a coloradoacademy.org email address, Google messaging, or a work phone number; and
- Any personal property and vehicles on the Colorado Academy campus.

B. Background Check

Prior to employment, CA will conduct criminal history records and Motor Vehicle Records (MVR) checks for all employees. Employees authorize CA to perform continuous monitoring of criminal and MVR records, and adverse findings, if any, will be shared with the employee. Both offers of employment and continued employment by CA are contingent on the results of the ongoing review of criminal and MVR records. An outside firm is used to perform these background reviews, and the results are received and reviewed by Human Resources.

Additionally, school bus drivers with a Commercial Driver's License (CDL) must also complete drug and alcohol testing in compliance with Federal Department of Transportation requirements. A positive test result or failure to appear for testing will result in immediate disciplinary action up to and including termination.

C. Confidentiality

All employees are expected to show the highest regard for the privacy of each student and the school and must strictly observe the confidentiality of records and other information associated with students and the school. Employees are required to respect and maintain the confidentiality of all information, including but not limited to, school records, documents, reports, files, correspondence and communications, student, employee interactions, student enrollment and performance records, health records, and pictures ("Confidential Information") to which the employee has access in carrying out responsibilities and duties both during and after employment with Colorado Academy. Except for student work being removed for the purpose of grading, no Confidential Information may be copied or removed from school premises. The obligation to keep Confidential Information confidential continues even after an employee no longer works for CA. Confidentiality obligations protect the school and its students, not employee privacy. CA may access systems as needed to enforce policy or law.

Employees are encouraged to pursue academic research and publications. However, any writing intended for publication, whether in print or electronic, must be reviewed and approved by the Head of School prior to publication for purposes of ensuring the protection of student privacy and other Confidential Information.

Employees must be careful to discuss Confidential Information only when necessary and appropriate in the context of school operations. Confidential Information may not be shared or

disclosed to anyone that is not associated with CA. Care should be taken to prevent confidential discussions from being overheard by other students, parents/guardians, or staff members who are not involved (e.g., discussing problems in the hall or reception areas).

It is essential that prior to having conversations with service providers, including psychologists, testers and other educational professionals, parents or guardians sign permission slips authorizing such discussion. Calls, letters, emails, or other forms of communication from legal counsel should be directed to a division principal or to the Head of School.

D. Conflicts of Interest

A conflict of interest can be broadly defined as a situation that raises a question about the objectivity of an employee's judgment and decision-making with respect to the work Colorado Academy does in educating students. Employees should always act in the best interests of CA and must not use their positions at CA to benefit either themselves, a family member, or an entity owned and controlled (directly or indirectly) by the employee or the employee's family member (a "Related Party"). A "Family Member" includes one's lineal ascendants, descendants, siblings, and spouse, as well as spouse's lineal ascendants, descendants, and siblings (by birth or adoption in all cases) and may, depending on the circumstances, include more remote relatives or relatives of in-laws.

Employees must avoid activities which could create a conflict of interest (or the perception of a conflict of interest), damage CA's reputation, or exploit an employee's relationship with CA. Employees should consult with the Director of Human Resources and obtain approval from the Head of School prior to engaging in activities which could create a conflict of interest including, but not limited to:

- Hiring, promoting, or compensating a Family Member;
- Hiring or promoting two Family Members within a department, division, or reporting line;
- Dating or having a romantic relationship with a supervisor or subordinate;
- Giving preferential treatment to a Related Party with respect to any School business (e.g., admission decisions, grading, student, or employee discipline, etc.);
- Entering a business transaction on behalf of the School with a Family Member or other Related Party (e.g., purchasing or selling goods or services, awarding contracts, offering reduced pricing/discounts, etc.);
- Providing services that compete directly with CA's offerings (e.g., auxiliary programs);
- Using the School's directories, tax exempt status, confidential or proprietary information, or other benefits to solicit personal business or generate personal gain;
- Participating in outside employment which interferes or coincides with School operations and/or the employee's core business hours at CA;
- Personal tutoring or coaching for pay of a CA student by a CA employee;
- Accepting gifts from students or families which are more than trivial in nature; and
- Disclosing confidential information acquired while performing duties and responsibilities.

In general, the use of good judgment, based on high ethical principles, will guide employees with respect to lines of acceptable conduct. Questions about whether a situation is a conflict of interest should be discussed with Human Resources.

1. Outside Employment

Full-time employees are expected to treat CA as their primary employer. This means any conflicts that may exist between employees' responsibilities to their positions at CA and any secondary employment must be resolved in favor of CA as primary employer. Although CA encourages and promotes outside personal enrichment and pursuit of other endeavors, outside engagement should not interfere with an employee's ability to conduct daily job functions at CA, nor should outside engagements be performed during CA's normal business hours.

2. Gifts to Employees

Employees are in general prohibited from accepting personal gifts (including tickets to entertainment events), favors, or services from students, parents/guardians, or suppliers of goods or services to CA, because such practice could appear to adversely affect our impartial judgment. However, the acceptance of occasional gifts, favors and tickets to entertainment events which are reasonable in nature, frequency and cost may be appropriate but cannot be more than $100 in value. Requesting or soliciting personal gifts, favors, entertainment or services, no matter how trivial, is not permitted under any circumstances.

3. Private Tutoring and Coaching

Private tutoring or coaching of Colorado Academy students by CA employees for compensation is not allowed. Exceptions to this policy include private music lessons and other exceptions may be made with explicit permission from the student's division head.

4. Off-Campus Activities

Employees must be aware of off-campus activities that may compromise CA's ability to educate students in a manner consistent with the school's mission and best teaching practices. This caution can apply to actions or statements by CA employees on or off campus and in digital spaces. Examples include writing or speaking about CA in ways that associate CA with the views expressed by the employee [especially through the public media], can damage the reputation of CA, or have the potential to interfere with the effective application of a teacher's classroom duties.

5. Employee Relationships with Parents/Guardians

Employees must maintain clear boundaries with parents/guardians of CA students. These relationships must not compromise CA's ability to educate students by the appearance of either favoritism or unfairness in the exercise of professional judgment. Employees are prohibited from developing romantic relationships with a parent/guardian while a student is enrolled in their class.

6. Employment of Relatives

Colorado Academy is committed to a policy of employment and advancement based on qualifications and merit and does not discriminate in favor of or in opposition to the employment of Relatives. This policy applies to all current employees and candidates for employment.

"Relative" is defined as one of the following: spouse or significant other, parent/stepparent, child/stepchild, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece, first cousin, in-laws (e.g., father, mother, son, daughter, sister, brother), or individuals who are not legally related, but who reside with another employee.

Due to the potential for perceived or actual conflicts, such as favoritism or personal conflicts from outside the work environment, which can be carried into the daily working relationship, Colorado Academy will hire Relatives of current employees only if candidates for employment will not work directly for or supervise a relative or occupy a position in the same line of authority or in which employees can initiate or participate in decisions involving a direct benefit to the relative (e.g. hiring, retention, transfer, promotion/advancement, wages, leave requests). Further, all employees must receive prior approval by the Head of School before hiring or promoting Relatives within the same department, division, or reporting line.

Relatives working at CA must take special care to avoid both actual and perceived conflicts of interest by maintaining appropriate professional boundaries with each other in all school and employment matters. The division principal or department director is responsible for ensuring policy compliance. Human Resources is responsible for monitoring changes in employment after initial hire to ensure compliance with this policy. Employees are responsible for immediately reporting any changes to their supervisor.

If any employee, after employment or change in employment, enters one of the above relationships, one of the affected individuals must seek reassignment or a change in the reporting relationship. Such changes must be approved by the Head of School. If a decision cannot be made by the affected employees within 14 days of reporting, reassignment will be made by the department director and the Head of School.

E. Copyright and Fair Use

CA recognizes and respects intellectual property rights and is committed to fulfilling our moral and legal obligations with respect to our use of copyright-protected works. Employees are expected to follow copyright laws and fair use guidelines. Employees may not reproduce copyrighted works in print, video, or digital form in violation of the law. In general, laws that apply to printed materials also apply to visual and digital formats such as websites, streaming media, music downloads, mobile apps, CDs, and DVDs.

The CA Library Department holds a Motion Picture License which enables employees to have public and in-class viewings of copyright-protected movies that are listed under the license. If there are films employees want to show that are not included with our license, there are fees for purchasing copyright permission to hold a public viewing.

Employees should contact the Director of Libraries or Divisional Librarian for more information, including clarification of permitted "fair use" of any copyrighted works.

F. Dress Code

CA values professionalism, respect, and a positive work environment. As such, we expect employees to present themselves in a manner that reflects these values by adhering to the following:

- Professional Appearance: Employees are expected to always maintain a professional appearance that is appropriate and respectful in an educational environment. This includes appropriate grooming, hygiene, and wearing clean, neat, well maintained, and appropriate attire that is suitable for a school environment.
- Prohibition of Offensive Attire: Attire that is offensive, discriminatory, or inappropriate in a school setting is prohibited. This includes clothing with offensive language, symbols, or images.
- Avoidance of Political or Controversial Statements: Clothing or accessories displaying political slogans, messages, or controversial images or statements are not appropriate for the workplace. This includes attire that could be deemed divisive, inflammatory, or disruptive within the school environment.

Supervisors are responsible for ensuring compliance with this dress code policy and have the authority to address any violations and may take disciplinary action, which may include counseling, verbal warnings, or other corrective measures. By adhering to this dress code policy, employees contribute to a positive work environment that fosters professionalism, respect, and collaboration.

G. Electronic Document Sharing

CA is required by federal and state regulations to share a variety of documents with employees on a regular basis. If an employee has a school email address and uses the email on a regular basis as part of their job, CA may share these required documents with those employees via email.

H. Fundraising

To request formal approval for fundraising, a written description of the fundraising activity, sponsoring group, anticipated use of funds and audience to be solicited must be completed. Student fundraisers must first be approved by the Faculty Sponsor and Division Principal before going to the Advancement Office for final approval. All other non-student fundraising ideas, whether by employee, parents/guardians, or others, must be approved by the applicable Division Principal or Department Director before going to the Advancement Office.

The Director of Advancement and Head of School will then review the proposal and decide whether it should be submitted to the Development Committee of the Board before issuing approval, or not, in writing to the sponsoring individual or group. There may be times the Development Committee will wish to take a project to the full Board before approving or denying the request.

No fundraising activity which sells items for, and returns funds to, entities without a direct CA affiliation will be approved whether student-initiated or not. Fundraisers should be creative and, whenever possible, enlist support of the greater Denver community, beyond the CA community. This is meant to limit the solicitation of CA parents/guardians to Advancement Office campaigns and fundraising initiatives.

Employees outside of the Advancement Office are prohibited from soliciting gifts directly from parents.

I. Funds Collected by Employees and Students

Any money collected by employees or students in cash or check form must be turned into the Business Office for safekeeping upon receipt. No funds should be held or stashed away in desks or file drawers. All checks, including checks for Horizons at CA, must be made payable to Colorado Academy.

J. Insurance

1. Professional Liability

CA's general liability insurance provides coverage to employees for all acts performed while performing the duties and responsibilities required of their position of employment. Errors and omissions coverage protects the employee from claims against them as individuals.

2. Automobile

When employees use their personal automobiles for school business, the employee's auto insurance provides the primary coverage, should an accident occur. This is true for both liability and property damage that is the result of an auto accident. Accordingly, employees driving a personal vehicle on school business are required to have in place current insurance coverage with at least the minimum dollar amount and types of coverage required by the State of Colorado. The school carries automobile liability coverage which is secondary to the insurance carried by an employee and protects the school, not the driver or the owner of the vehicle.

3. Personal Property

The school carries no fire, theft, loss, damage, or mysterious disappearance insurance for any personally owned property, regardless of the circumstances of the loss. All insurance on personal possessions is the sole responsibility of the employee.

K. Intellectual Property

Employees' duties and responsibilities to CA may include the preparation of materials, including, without limitation, written or graphic materials. Any such materials conceived or written by an employee as part of an employee's work for CA and/or related to the business of CA was or shall be done as a "work made for hire," as defined and used in the Copyright Act of 1976, 17 U.S.C. § 1, *et seq.* In the event of publication of such materials, and since the work is a "work made for hire," CA shall solely retain and own all rights, titles, and interests in and to said materials, including, without limitation, all rights of copyright. If, for any reason, such work is determined not to be a "work made for hire" or such doctrine is not effective, by the acceptance of employment with CA, an employee irrevocably assigns, conveys and otherwise transfers to CA and its respective successors, affiliates, licensees, and assigns, in perpetuity, all right, title and interest worldwide in and to such work and all proprietary rights therein, including, without limitation, all copyrights, trademarks, design patents, trade secret rights, moral rights, and all contract and licensing rights, and all claims and causes of action with respect to any of the foregoing, whether now known or hereafter to become known. In the event an employee has any right in such work which cannot be assigned, the employee agrees to waive enforcement worldwide of such rights.

L. Professional References

From time to time, a colleague or former colleague may ask a CA employee to write a recommendation for future employment. Official references for former CA employees should come from Human Resources or the Head of School and will be neutral in nature: limited to title and dates of employment. Employees who choose to provide a personal reference for a former CA employee must comply with the following:

- The recommendation must be construed as unofficial and in no sense may be represented as written on behalf of the school. The colleague recommendation should always include the following disclaimer: "This letter of recommendation is furnished by me as a colleague of [the employee] and does not constitute a recommendation by Colorado Academy. I do not have access to the personnel files of [the employee] and am not sufficiently informed to give an unqualified recommendation of [the employee] as a potential employee. Any request for a recommendation from Colorado Academy must be made in writing to the office of the Head of School."
- The employee's relationship with the recommended colleague and areas of competence should be clearly defined.
- The recommendation should be for a specific position with a specific potential employer and should not be issued as a general letter of recommendation [to whom it may concern, for instance].
- The letter may not be written on Colorado Academy letterhead.
- Letters of recommendation should not be sent via email unless the letter is attached as a document which cannot be altered (ex. "pdf "file).
- The content of the recommendation letter must be truthful.
- In follow-up phone calls, employees should repeat only the content of the original letter; calls for supplementary information should be directed to the Head of School.
- When in doubt about the proper course, err on the side of extreme caution and consult with the Head of School or Human Resources.

Failure to comply with the above protocol could result in disciplinary action up to and including termination.

M. Personnel Files

Employee personnel records are the property of Colorado Academy. Employees, while employed, can request to review the contents of their personnel file upon written request to Human Resources. Please note that personnel files include official formalized records (e.g., employment appointment letters, new hire paperwork, performance improvement plans, etc.) and typically do not include less formal documentation related to employment or performance (e.g., emails, HR investigation notes, managers' notes from verbal conversations, etc.). A former employee may make one inspection of their personnel file after termination of employment. Employee personnel files will be retained for ten years after an employee's employment with CA has terminated.

N. Relationships in the Workplace

1. Family Members Visiting Campus

Children, family members, associates or friends are welcome for occasional, brief visits to campus. However, children may not visit the workplace if their presence adversely affects the employee's work or conflicts with the needs of co-workers. Non-routine visits by children that do not interfere with an employee's ability to perform their work functions, or the productivity of co-workers are allowed. To manage the cost of food services, family members are only allowed to eat lunch in the Campus Center infrequently and with prior approval by a supervisor.

2. Romantic Relationships with Coworkers

The development of a romantic relationship with a coworker is permitted only under the following circumstances:

- No employee in a management or supervisory position shall have a romantic or dating relationship with an employee whom they directly supervise or whose terms or conditions of employment they may influence (e.g., promotion, termination, discipline, and compensation).
- Employees are expected to always conduct themselves in a professional manner. Workplace dating or romantic relationships must not interfere with any employee's professionalism, including treating others with respect and refraining from behavior that may make others feel uncomfortable or may create a perceived conflict of interest (e.g., overt physical displays of affection and using sexual language).

O. Standards of Professionalism

CA's reputation is shaped by the quality of work its employees produce and the manner in which they represent the institution. All interactions – whether with students, parents and guardians, trustees, alumni, suppliers, colleagues, or the general public – must reflect the standards of professionalism, quality, integrity, and kindness that define Colorado Academy's mission and culture.

Personal appearance, conduct, habits, and communication all play a significant role in upholding the school's image. Employees are expected to exercise sound judgment in their use of social media and must refrain from posting or sharing content, including messages, images, or video, that could adversely reflect upon CA's reputation.

The quality of Colorado Academy's working environment is equally central to its success. All employees are expected to treat one another with consistent respect and courtesy.

P. Use of School Property

Equipment and other property owned by CA should not be taken home and should not be used for personal reasons without prior approval from a direct supervisor. Laptops and iPads that are issued for use by a specific employee may be taken home for school related business. If the property being used off campus is lost or damaged, the employee is financially responsible for replacing CA's property and equipment (see section on Acceptable Use of Technology Resources.)

Employees are eligible to use the tennis courts, gyms, and the swimming pool at hours when they are not being utilized for the CA athletic program, or summer camp, or for any official school functions. Access to these facilities terminate at the conclusion of employment with CA.

Use of campus facilities by employees for personal events may be allowed but must be approved in advance via a signed Facility Use Agreement through the Office of Auxiliary Programs.

Q. Resolving Disputes

Employees are expected to actively participate in conflict resolution and to address disputes according to the following chain of command:

- If a conflict with a colleague arises, the first step is to attempt a direct conversation with that colleague in order to reach a mutually agreeable resolution.
- If the dispute cannot be resolved directly, the matter should be brought to the relevant division principal or direct supervisor. A frank conversation at this level is often the most efficient path to resolution.
- If the matter remains unresolved or is of a nature that makes discussion with a direct supervisor uncomfortable or inappropriate, it should be directed to Human Resources.
- If satisfactory resolution has not been reached through the direct supervisor or Human Resources, the matter may be escalated to any member CA's Leadership Team up to and including the Head of School.
- With the exception of complaints that fall under the Whistleblower Policy described below, the Board of Trustees may only be approached after all other steps in this chain of command have been exhausted.

R. Whistleblower Policy

This Whistleblower Policy supersedes standard dispute resolution procedures. A whistleblower is an employee who reports an activity that they consider to be a violation of a law, rule, regulation, code of ethics, or a clear mandate of public policy to one or more of the parties specified in this Whistleblower Policy. The purpose of this policy is to establish a procedure for Colorado Academy employees to report illegal or dishonest activity or other misconduct involving the school's financial or business affairs, and to protect employees from retaliation who, in good faith, provide truthful information.

Illegal or dishonest activity may involve another employee or outside persons or firms doing business with CA. Examples of illegal or dishonest activities are violations of Federal, State, or local laws, billing for services not performed, fraudulent financial reporting or other misconduct involving CA's financial or business affairs. This policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

1. Employee Reporting Process

Employees who have knowledge or a concern of illegal or dishonest activity or misconduct should communicate with an immediate supervisor, Human Resources, the CFOO, or the Head of School. Communications may be verbal or written. No specific format is required; however, all communications should include as much information as possible to permit a

thorough and complete evaluation of a complaint or charge. This includes material evidence, names, or people able to corroborate the accusations, if possible, and how to contact the complainant to assure anonymity, if anonymity is desired.

The recipient of the complaint is responsible for ensuring that all information regarding the complaint is properly recorded and thus becomes the formal record of the complaint. A copy of the written complaint will be provided to the complainant for confirmation of accuracy.

2. Role of the Head of School

All complaints received under this policy will be promptly submitted to the Head of School, who is responsible for overseeing the investigation and coordinating corrective actions. The Head of School will determine the level of investigation that the complaint warrants and who is the appropriate party to perform the investigation. He is responsible for determining if the facts support or do not support the complaint. The Head of School will provide a written explanation of the decision to the employee who made the complaint.

The Head of School in their discretion may report to CAs outside general counsel complaints received under this policy, their status, and their resolution. The Head of School is required to report to the Chair of the Board of Trustees regarding School compliance with this policy.

For violations involving the Head of School, the Chair of the Board of Trustees will fill the role of the Head of School and perform the responsibilities identified in the preceding paragraphs and report such complaints to the CA Executive Committee.

A person who believes that their report of illegal or dishonest activities or other misconduct involving the school's business or financial affairs is not receiving appropriate attention from the Head of School may contact the Chair of the Board of Trustees.

3. Employee Responsibility

An employee (whistleblower) who makes a complaint or charge must exercise sound judgment and act without malice to avoid baseless allegations or frivolous complaints. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

4. Employee Protection

Colorado Academy will protect whistleblowers against adverse action in the form of retaliation. This includes, but is not limited to, protection from employment actions such as termination, compensation decreases, poor work assignments and threats of physical harm. Any whistleblower who believes they are being retaliated against should contact the Head of School, or, in the case of perceived retaliation by the Head of School, the Chair of the Board of Trustees.

Confidentiality of the whistleblower will be maintained as far as is possible. However, at the discretion of the Head of School or the Chair of the Board, the whistleblower's identity may have to be disclosed to conduct a thorough investigation or to comply with applicable laws.

Any employee, however, who knowingly files a false or materially misleading report of illegal or dishonest activities or other misconduct involving the school's business or financial affairs, is subject to disciplinary action up to and including termination.

S. Breastfeeding

CA offers a private, designated lactation space for parents to breastfeed their children on the second floor of the infant nursery house in the Early Childhood Education (ECE) Village. This lactation space includes a refrigerator, freezer, and hospital-grade breast pump with tubing; parents should provide their own collection equipment and milk storage items. If an alternative space is needed, please contact a department supervisor and/or Human Resources. ECE staff and CA employees are required to follow the storage and handling of breast milk guidelines as defined by Colorado Department of Human Services regulations and Colorado Rules and Regulations Governing the Health and Sanitation of Childcare Facilities. Contact the Director of ECE for more information.

T. School Insignia

CA's insignia are defined herein as the school's name, crest, logos, and any other official emblems that are unique to Colorado Academy and are vital parts of the school's brand and image. Consistence in the usage of insignia helps to develop and maintain the brand and lends credibility to CA's endeavors. As such, CA's insignia may not be used nor modified in any way without the prior written authorization of the Director of Marketing and Communications, CFOO, or the Head of School. This includes, but is not limited to, the use of CA insignia on websites, social media accounts, and clothing.

VIII. RESPONSIBILITIES WITH STUDENTS

A. Student and Adult Interactions

CA employees are compassionate, generous, and caring adults who have a sense of their professional responsibilities and of the significant roles they play as models for the children and adolescents they teach. Those relationships create an environment conducive to learning, serve as a model of ethical and caring adult behaviors, and provide children with a safe and stable context from which they can manage their growth in security. Relationship building is a professional skill with a deep moral obligation underpinning it; every teacher knows the importance of this teaching dimension and the lifelong significance of its effects for both student learning and personal growth. As with any "bonding" experience with emotional and moral roots, there are dangers of which adults must be aware: too much intensity in the experience can create emotional dependencies, can lead to romanticized projections, can create exclusive attention denied to other students, and can inappropriately blur the personal and professional.

B. Role of the Adults

Any adult who works with students has a responsibility to approach their work with the highest degree of professionalism. Student safety – both physical and emotional – must be at the forefront of all interactions with students. Although the school values positive student-teacher relationships, there needs to be a professional distance and separation in relationships between students and adults. Our role as a CA employee is to support student learning across a broad spectrum of subjects and activities. Employees should be aware of the important limits of the relationship. There are many subjects of a personal nature in which adults must refrain from engaging with students. Thus, good judgment and clear communications with administrators are critical for ensuring student safety and healthy adult-student relationships.

Employees must be mindful and intentional about the appearance of their relationships with students. If employees have questions about what an "appropriate" relationship with a student is or have concerns about another colleague's relationship with a student, there are various avenues for advice and disclosure. One can speak to the Head of School, Assistant Head of School, the CFOO, Director of Risk Management, a division principal, or one of the school's mental health counselors. The appearance of impropriety can carry the same consequences as being inappropriate with students. Certain behavior that might be seen as "helping" a student might be beyond the scope of an adult's expertise or school responsibilities and might be damaging for a student's emotional and physical safety. Likewise, the significant divide between a student's emotional maturity and an adult's is something all need to recognize when working with a student. Adults have tremendous power and influence over young people. Thus, adults must always be mindful of this disparity and should not make requests of students that play on their vulnerability.

At the heart of educating students is an irreducible tension: we want authentic, meaningful relationships with students, while also ensuring that no relationship is experienced as exclusive or preferential – and the goal is not to eliminate that tension, but to manage it with clarity and consistency. Adults must:

- Conduct themselves in ways to reduce the likelihood of students perceiving special access to, or advocacy from, an adult beyond that adult's defined role (e.g., advisor, affinity group leader, dean);

- Actively work to ensure that no student feels they have a unique or privileged relationship with an adult that's not equally available to others within that adult's role;
- Reinforce, through both words and actions, that all adults operate as part of a unified team grounded in mutual respect, trust, and professional alignment – even when specific roles require differentiated support for students;
- Be mindful about maintaining appropriate boundaries in communication, ensuring that students do not gain "inside" knowledge of school operations, conflicts, or tensions; and
- Remember their professional role, and never engage with a student as a friend, parent, family member, or therapist.

C. Four Behavior Standards

- ***Roles:*** Employees must stay in their professional roles in all interactions with students and families and avoid personal roles, which send mixed or ambiguous signals to students. Adults should function as a role model, always making the student's interests primary and never meeting the adult's needs through the student.
- ***Power:*** Employees are in positions of perceived and actual power over students and should always be alert to this inherent power imbalance. It is the responsibility of teachers to assist students with developing into autonomous individuals.
- ***Boundaries:*** Boundaries are the physical and emotional limits individuals set in their interactions and relationships with others. Boundary violations occur when a person in a position of responsibility crosses a boundary with someone who is vulnerable to meet their own needs.
- ***Accountability:*** Employees should avoid even the appearance of impropriety. Leave the door to the room open and avoid repeated unscheduled meetings alone with students. Be especially careful to stay in a professional role and maintain professional boundaries when using technology to communicate privately with students.

D. Mandatory Reporting of Child Abuse

The State of Colorado mandates educators' responsibilities in protecting students regarding child abuse. Specifically, any independent school employee or official (among others) who has reasonable cause to know or suspect that a child has been subjected to abuse or neglect or who has observed the child being subjected to circumstances or conditions that would reasonably result in abuse or neglect shall, immediately upon receiving such information and within twenty-four (24) hours of becoming aware of the issue, directly report such fact to 911 (in case of emergency) or to 844-CO-4-KIDS (844-264-5437). Mandatory reporters cannot delegate reporting responsibilities to others at the school (e.g., counselor, Principal, etc.). Accordingly, each employee must make the report themselves but can have a school counselor help them with the process and/or join them while making the report. CA employees must also complete an internal ***Incident Report*** to ensure there is retrievable documentation of CA compliance with mandatory state reporting requirements.

Colorado Academy requires all employees to abide by this law. In addition, all employees should notify their division principal and school counselor as soon as possible if the employee believes there to be grounds for making a report.

"Abuse" or "child abuse or neglect" means an act or omission in one of the following categories which threatens the health or welfare of a child:

- Skin bruising, bleeding, malnutrition, failure to thrive, burns, fractures, subdural hematoma, tissue swelling or death;
- Any case in which a child is subjected to unlawful sexual behavior; and
- Any case in which a child needs services because the child's parent/guardian fails to take the same actions to provide adequate food, clothing, shelter, medical care, or supervision that a prudent parent/guardian would take; or any case in which a child is subject to emotional abuse.

Should an employee be accused or suspected of committing child abuse, they will be temporarily put on administrative leave and suspended from all duties (with pay). Such suspension of duties will remain in effect pending the outcome of the investigation by the appropriate authorities.

E. Appropriate Boundaries

Student boundary rules supersede all technology and communication policies and apply without exception:

- The development of personal or private relationships with students is strictly prohibited. Private one-on-one communication and social contact with students outside regular school hours, whether in person or digital, is not permitted.
- Contact with students must be restricted to professional duties, conducted in group settings capable of broad supervision.
- Meetings with students behind closed doors are not permitted.
- Private video conferencing with students after school hours is not permitted.
- Interaction with students via social media (e.g., friending, direct messaging, posting) is not permitted.
- Communication with students or their parents/guardians should not occur via personal mobile phone or text message, except in genuine emergency situations.
- For situations requiring immediate feedback, Google Chat between school accounts is an approved communication method. Google Chat functions similarly to text messaging, but all messages are archived in accordance with Colorado Academy's retention policies.
- Special arrangements privately contracted with students and/or parents/guardians, including but not limited to, house sitting, babysitting, dog sitting, are not permitted.
- Tutoring currently enrolled students is not permitted without explicit approval from the relevant division head, and such approval is granted only under extraordinary circumstances.
- Employees may not develop any social media relationships with parents/guardians beyond clearly professional networks such as LinkedIn. Questions about this policy should be directed to a direct supervisor.

CA makes every effort to avoid placing students and employees together in settings where alcohol is present. It is illegal to sanction the consumption of alcohol by any enrolled student, and employees must not participate in occasions where students are in the presence of alcohol. Alcohol consumption by employees is prohibited on all student travel. On only two school functions permit alcohol to be served where students are present – the Auction and the Commencement Dinner – and at both events students are under the direct care of their parents/guardians. Under no other circumstances, formal or informal, should employees find themselves in situations where alcohol is part of student-adult interaction.

Employees who are also parents/guardians of children enrolled at CA must take particular care to maintain appropriate boundaries with their children's classmates and those students' families. Questions or concerns should be directed to the relevant division principal or supervisor.

Adults who oversee students on a daily basis are bound by school policies regarding the care, supervision, safety, health, and moral well-being of those in their charge. Enforcement of stated policies is an unalterable obligation, for both legal and professional reasons. Any violation of the welfare of students, whether on-campus and off-campus, formal or informal, can lead to the immediate dismissal of the employee.

Good and mature judgment is of the essence in these matters. It would be difficult to imagine a position too conservative on this subject. Please study ***Appendix C*** and ***Appendix D***, which are designed to help guide employees and increase awareness of appropriate professional boundaries. Violations of these guidelines for interactions with students, or any conduct considered inappropriate or unsatisfactory may, at CA's discretion, subject the employee to disciplinary action up to and including termination, and may result in a report to be made of such fact to the county department of social services or local law enforcement agency in compliance with the State of Colorado's mandated reporter guidelines.

F. Conferencing and Advising

CA employees value ensuring that everyone is known, encouraged and respected. It is important to learn more about the children we teach, their individual learning differences, their histories, their interests, their competencies, and areas of expertise. Lower and Middle School teachers send a welcome message to their students before school starts, and after school begins, they welcome open communication with parents/guardians. This includes face-to-face conversations, phone calls, email, and conferences early in September, again in October and then in the spring. In the Upper School, the advisor serves as the students' and the families' first point of contact when a problem arises at school.

G. Counseling of Students

The general objectives of the School Counseling Program are to aid students to meet the challenges of modern life armed with knowledge of their physical, social, intellectual, and emotional development; become knowledgeable about educational, occupational, and social opportunities; learn decision-making skills and combine these insights into personal plans of action.

School Counselors collaborate directly with administrators, faculty, parents/guardians, and professional community resources in order to meet the specific academic, developmental, social, and emotional needs of students. Students and/or parents/guardians can schedule appointments with the School Counselor in their division to discuss any range of emotional, behavioral, social, or learning concerns. In cases where the needs of the child warrant the involvement of an outside professional (e.g., psychologist, psychiatrist, occupational therapist, speech and language therapist, or tutoring), an appropriate referral will be made.

Members of the school community commit themselves to maintaining professional tact and discretion regarding any confidential information they receive. However, employees are cautioned about entering confidential relationships with students, including the use of journals. Students should be informed by teachers that information revealed to them either verbally or through a written process which raises any concerns about their health or well-being, a danger to themselves or others, cannot be held in confidence and will be shared ("duty to warn") with the School

Counselor in their division for safety and liability purposes. Confidential information may be disclosed to the Head of School, Assistant Head of School, Division Heads, Deans, outside professionals, law enforcement officers, parents/guardians, or others where appropriate.

Any employee who becomes aware of a student who may pose a danger or threat to themselves or others is required to immediately notify that student's division School Counselor. The School Counselor will respond appropriately to assess and preserve the safety and well-being of the at-risk student.

H. Social Media

Employees are prohibited from interacting with students via social media (e.g., friending, direct messaging, posting, etc.) with current students or former students under the age of eighteen (18). Initiating or accepting "friend requests" of current school parents/guardians is also prohibited. Also see the ***Acceptable Use of Technology Resources*** section for additional guidelines for appropriate use of technology resources.

I. Enforcement of Student Rules

Employees should read and understand the student/parent handbook and other division-specific guidelines for the division in which they teach. Most rules for students are simple, predictable, and necessary, and it is the responsibility of all employees to enforce them. Nothing more quickly undermines an employee in the eyes of their students, colleagues, or supervisors than "looking the other way."

J. Information to Parents/Guardians

All communications generated by CA will be distributed to the custodial parent/guardian, stepparent(s), and the non-custodial parent/guardian alike. Similarly, parents/guardians are granted permission to visit the student on school grounds. However, given the unique legal situation of each family, CA may make exceptions to the policy. In particular, the removal of the student from the school campus by the non-custodial parent is an issue that will be addressed by the division principal or the Head of School.

Faculty communication with parents/guardians about a student's work, failed work, and incomplete work must be timely to be effective. No criticism of a school is more telling than the criticism by parents/guardians that they were advised too late in a deteriorating situation and that the school did nothing earlier in the way of remediation.

Faculty are expected to communicate with parents/guardians proactively and appropriately regarding student progress in an ongoing fashion. Divisional expectations regarding the specific timing and shape this communication should take varies depending upon the developmental age of the child.

K. Requests by Authorities to Speak with Individual Students

Occasionally social workers, police officers, or other individuals will arrive on campus and ask to speak with students. All such individuals should be referred to the division principal, or in the principal's absence, to the Head of School. Under no circumstances should such individuals be permitted to see the student before receiving approval from the Principal or Head of School.

L. Third-Party Studies on Colorado Academy Students

CA's policy is to decline all invitations from doctoral candidates or individuals seeking to use enrolled students as a sample group for studies, surveys, or research assignments. Any such request, whether from an individual, an organization, or an educational institution, should be declined with the explanation that participation is not permitted under school policy.

M. Student Discipline

When a student does not exhibit appropriate behavior, CA has student discipline policies to address the incident. These policies are outlined in the Student/Parent Handbook, and employees are responsible for adhering to these policies. Colorado Academy does not tolerate verbal or physical abuse of any kind.

Corporal punishment of a student is expressly prohibited by CA and Colorado state law.

N. Tutoring

Questions are sometimes raised about Colorado Academy policies regarding tutoring assistance for students who need specific skill remediation. Learning difficulties encountered in the classroom cause student, teacher, and parent/guardian concern. The teacher is always the first line of identification and remediation, and it is the teacher who offers suggestions to parents/guardians about home assistance or teacher help sessions for students at appropriate times during the school day. The teacher knows the student's history from their permanent file and has the kind of daily learning encounters that can best identify problems and suggest skill-building extra help.

If problems persist, diagnostic testing or professional tutoring may be recommended. To determine the need for testing or tutoring, the teaching team (including teacher, principal, and learning support staff) will meet to discuss the student's needs and plan appropriate action. It is not appropriate for teachers to refer families to outside evaluators or tutors. The learning support staff or the principal will make referrals after thorough consultation with the teaching team.

The school does not supervise tutors or evaluate their work with students. However, the learning support staff has names of tutors who have worked successfully with CA students. On-campus tutoring should be avoided. Any requests for on-campus tutoring must be approved in advance by division principals, and employees may not tutor CA students for compensation unless explicitly approved in writing by the Division Principal.

Colorado Academy teachers who are asked to tutor CA students for compensation should consult with their divisional principal or director. Also see the Conflict-of-Interest section of this Employee Policy Book.

O. Student Images

Throughout the school year, students are often recognized for taking part in activities and achievements at Colorado Academy. The recognition could be included in, but is not limited to, promotion on the school website, digital newsletters, brochures, or social media. Certain parents/guardians may prefer to maintain their family's privacy by declining to sign an annual Media Consent and Release for their student(s). This is with the understanding that CA will not reproduce said photograph, interview, likeness, or student work for any commercial value or receive monetary gain for such use.

CA's Marketing and Communications Department is responsible for monitoring the "Do Not Publish" list whereby parents/guardians prohibit their students' photos from being published or used by CA and its employees. Accordingly, employees may not share or publish any photos or videos of CA students in any public forums or with individuals outside of the CA community without express permission from the Marketing and Communications Department.

IX. EMPLOYEE GROWTH AND PROFESSIONAL DEVELOPMENT

CA's goal in all aspects of our evaluation and advancement process is to be fair and transparent in how we help each employee become successful in their work at CA and encourage excellence. CA believes that high quality evaluation involves the participation of the employee, focuses on professional growth, and leads to improved student outcomes.

CA values internal growth and encourages qualified employees to apply for open positions. Internal candidates are evaluated using the same criteria as external candidates. Advancement opportunities depend on institutional needs, role availability, and demonstrated performance.

A. Educational Assistance

Recognizing the importance of professional growth and development, CA has established an Educational Assistance Plan for all full-time employees who have completed at least one year of employment with CA. Under this plan, CA will reimburse a full-time employee up to $3,000 per fiscal year for satisfactory completion (i.e., grade of C or better) of formal educational coursework or other training which through anticipated gains in knowledge and/or specific skills could enhance the employee's performance of their job at CA (i.e., advanced degrees).

The determination of which courses qualify for reimbursement is made by the CFOO for staff and the Head of School for faculty and must be approved in advance. Reimbursable expenses are limited to tuition and fees. Full-time employees must apply for the Educational Assistance Plan funding by completing the electronic Professional Development application form available on the Faculty Resource Board and including a copy of the official transcript and proof of payment.

In recognition of faculty members' pursuit of advanced degrees, CA will increase a full-time teaching faculty member's salary by $2,000 upon receipt of a master's degree and $4,000 upon receipt of a doctorate degree while employed as a full-time teaching faculty member at CA. It is the employee's responsibility to notify Human Resources upon graduation.

B. Professional Development (PD)

CA supports its PD program through regular budgetary allocation and through endowed funding established for that purpose (e.g., Benson, McHugh, etc.). It is a professional expectation that employees continue to upgrade their skills through professional development over time. Employees are encouraged to consider workshops, conferences, summer programs, research, and curriculum development as a part of their professional goals. Professional development participation does not guarantee promotion or role change.

No expenses should be incurred until the employee receives final approval from the Division Head or Department Director. Considerations for approval include the overall cost of the program and the frequency of requests.

1. Staff

Staff may apply for professional development funding by completing the Professional Development application form available on the Faculty Resource Board. No expenses should be incurred until the staff member receives final approval from the Department Director. Considerations for approval include the overall cost of the program, the overall

departmental budget for professional development funds, professional development hours required to maintain certain certifications, and the frequency of requests.

2. Faculty Rotating Funds

Full-time teachers may apply for Faculty Rotating PD Funds to attend workshops and conferences that support and deepen the work that they do at CA. Leave replacement teachers may be eligible for Faculty Rotating PD Funds for the academic year work at CA if the professional development opportunity pertains directly to and will immediately enhance their current work at CA.

To provide PD opportunities to as many different faculty members as possible, Faculty Rotating PD Funds operate with a rolling three-year limit of $3,000 per faculty member over a three-year "window" of time (ex: this year, last year, and the previous year). With the support of their principal, faculty may utilize these funds in whichever ways they see fit (ex: one larger professional development experience every three years or smaller experiences over three years) if the total award does not exceed $3,000 over three years.

The following types of professional development do not count against the three-year limit of $3,000 per faculty member:

- **Annual Faculty Awards**, as described below, are made to recognize excellence in teaching. Faculty are nominated by their peers and decided upon by the Head of School.
- **Summer Work Grants** geared toward school-identified (or school-mandated) work that maintains or develops the academic program.
- **Advanced Degree** tuition support may be offered at the sole discretion of the Head of School. Advanced Degree work must be in a field that directly enhances the individual's current (or future) work at CA.
- **Mandated Professional Development** may be required by a division head related to an experience or school visit to support a larger school initiative or an agreed-upon goal that falls outside the immediate priorities of that faculty member.
- **Other Professional Development** to further the mission of CA and/or enhance the experience of its employees and students may be offered at the discretion of the Head of School.

C. Evaluation

Colorado Academy's evaluation process reflects the school's commitment to professional growth, accountability, and alignment with its mission and values. Evaluation is designed as an ongoing cycle of reflection and feedback that supports individual development and institutional excellence. CA's Employee Growth Cycle emphasizes four principles: fostering a culture of ongoing professional learning, ensuring clear and cohesive systems, providing equitable access to growth opportunities, and aligning professional goals with CA's mission and strategic direction.

The *Aspiring for Excellence* frameworks define what excellence looks like across roles and serve as the foundation for evaluation. These frameworks emphasize four core domains: planning and preparation, environment and culture, delivery of work, and professional responsibilities. Evaluations occur annually, prior to re-appointments in February, and may include interim check-

ins as appropriate. Each employee engages in a reflective process with their supervisor or division head that includes self-assessment, goal setting, and a review of progress toward professional and institutional priorities.

For faculty, this process includes classroom observation and discussion guided by the *Aspiring for Excellence in Teaching & Learning* framework (***Appendix A***). Faculty participate in an evaluative process which includes self-reflection, discussion of a professional growth plan, classroom observation, and conversations about efficacy and student progress with their division principals. The outcome of this process is a focused course of action tailored to help each teacher encourage increased student progress. Within each of the three divisions, a variety of strategies are employed to support teachers. The strategies include professional growth activities and workshops, targeted self-evaluation, professional development planning, as well as division head and Head of School observations with feedback.

For staff and administrators, reflection and goal setting are based on the *Aspiring for Excellence in Support of Teaching & Learning* framework (***Appendix B***).

When performance concerns arise, supervisors will provide timely, verbal and written feedback and classroom observations (for faculty). This process often includes specific suggested areas for improvement with a timeline for accomplishment. This more formal process can lead to a formal Performance Improvement Plan (as further described below), probationary status, non-renewal of employment for the following school year, and/or immediate termination.

D. Annual Employee Awards

1. Yoeman Fisher Teaching Excellence Award

The Yoeman Fisher Award was instituted in 1980 in honor of a beloved Lower School teacher who was retiring. It was put into place to recognize an individual with an extensive career of outstanding teaching at Colorado Academy. The criteria for the award are:

- Peers, students, and parents/guardians consider the individual to be a creative, inventive, inspiring, and knowledgeable teacher.
- The individual as a role model displays in their own life the qualities of invention, curiosity, and intellectual discipline which we seek to inculcate in students.
- The individual is seen by their peers as a source of sound advice and an intelligent critic of teaching strategy.

2. Frances Newton Outstanding Faculty Award

Named in the spring of 2003, and endowed by an anonymous donor, the award recognizes those who model teaching excellence, who render exemplary service on behalf of students and colleagues, and who in their teaching practice provide examples of the multiple talents and values that are mirrored in the school's mission.

3. Connie Adcock Award for Inspirational Teaching

Named in the spring of 2011, and endowed by an anonymous family, this award was created to honor this one-of-a-kind Faculty member upon her retirement from Colorado Academy, after teaching First Grade and Kindergarten for 21 years. It recognizes a teacher

who ignites in students a lifelong love of learning and creative expression using innovative teaching methods.

4. Head of School's Award for Distinguished Service

Designated by the Head of School, this award recognizes an employee who provides extraordinary service to the school. The recipient of this aware goes above and beyond, playing a unique and vital role in the wellbeing and education of our entire CA community.

5. Alanna Brown Staff Award

This aware, created in 2024 in honor of CA's past CFO and Business Manager, Alanna Brown, recognizes a staff member who has provided extraordinary service to the students, employees, and administration.

E. Performance Improvement Plan (PIP)

If an employee is not meeting professional standards during any year of their career at CA, a more formal evaluation process (PIP) may be initiated. This includes meeting with the division head, department director, Head of School, and/or Human Resources to discuss the issue(s) which may be preventing the employee from successfully meeting expectations.

The PIP will include a plan and timeline to help the employee address these challenges and monitor progress at regular intervals. This process may include formal classroom observations (for faculty) and/or periodic written and oral feedback from a supervisor. This process may lead to being placed on a probationary status, non-renewal of employment for the following school year, and/or immediate termination.

As outlined in the PIP, any timeline established is not a promise of continued employment through the end of the PIP nor through the end of any appointment. Failure to meet or exceed expectations or any display of gross misconduct will result in further disciplinary action, up to and including termination, prior to and/or subsequent to the end of the PIP or appointment letter term.

There may be occasions, in the sole and absolute discretion of the Head of School, when immediate termination of employment is justified. In such circumstances, no PIP will be given.

X. TRAVEL SPONSORED BY THE SCHOOL

Employees who are given authorization to travel for professional development or any other purpose on behalf of the school are expected to exercise good judgment with respect to incurring expenses and are expected to spend school funds prudently. Employees will be reimbursed for actual and reasonable expenses incurred while traveling on behalf of the school. All reimbursement requests must be substantiated by original, itemized receipts. CA reserves the right to refuse reimbursement for any expenses not properly authorized or documented.

A. Airfare

It is the responsibility of employees to book the least expensive airfare consistent with their itinerary and the business purpose of their trip. Employees should strive to make their travel plans as early as possible, thus taking advantage of advance purchase fares. Baggage fees charged by airlines that are reasonable and appropriate for the purpose and length of the trip are reimbursable. Other airline fees including, but not limited to, seat upgrades, in-flight movies, and ticket change fees are considered personal expenses and will not be reimbursed.

B. Lodging

When making lodging decisions employees are requested to make financially prudent selections of hotels and motels, using IRS per diem rates as a rule of thumb. CA supports separate rooms for all employees when traveling on school business. Meals ordered through room service are reimbursable, but employees are encouraged to estimate the cost of a restaurant meal in comparison to in-room dining and exercise prudence. Luggage storage and reasonable tips for service are reimbursable expenses. In-room movies and other recreational activities while traveling will not be reimbursed.

C. Meals

The actual expense of meals while out-of-town will be reimbursed. IRS per diem rates are not used by CA for reimbursement but should serve as a guideline for budget purposes or for use when requesting professional development funds. Excessive tipping (greater than 20%) or excessive alcohol are not authorized expenditures. The IRS requires all business meal expense documentation including a list of attendees and business purposes. This information must be noted on receipts submitted for meal reimbursement when attendees include individuals in addition to the employee submitting the receipt.

D. Rental Vehicles

Rental cars must be limited to economy or mid-size class vehicles. When renting a vehicle in an employee's name for school business travel, it is recommended that additional insurance be purchased from the rental agency to provide supplemental liability and property coverage. CA will reimburse the cost of this insurance as part of the total rental expense.

E. Mileage

CA will reimburse authorized use of personal vehicles (including electric vehicles) for school-related travel at the current IRS mileage rate. Actual expenses such as gasoline and oil are not reimbursable. Reimbursement applies only to miles traveled in excess of an employee's regular daily commute to and from school.

F. Recreational Expenses

Expenses incurred during personal time while traveling on school business are considered personal expenses and will not be reimbursed. This includes, but is not limited to, hotel health club or fitness room fees, sightseeing trips, tours, and entertainment such as movies. Lodging costs for additional days spent in a destination for personal or recreational purposes are not authorized school expenses.

G. Travel Companions

CA recognizes that employees may, at times, be accompanied by non-employee travel companions. Direct expenses of non-employees will not be reimbursed.

H. Expense Reimbursements

Within thirty (30) calendar days of completion of a trip, employees must submit an expense reimbursement form and supporting documentation (e.g., invoices, receipts) to obtain reimbursement of expenses, document the use of cash advances, or substantiate use of a school purchasing card.

XI. ACCEPTABLE USE OF TECHNOLOGY RESOURCES

The purpose of the Colorado Academy technology resources and network is to support the educational mission of the school. The use of such resources should be limited to those activities that support CA's educational objectives. This policy outlines key principles regarding technology use and expectations of privacy when using school-provided resources. This policy is designed to maintain the safety and security of the school and all employees, students, and community members.

A. General Use

Employees may not use electronic devices in any way that is a violation of the law, harassing, or disruptive to the educational environment, including accessing, publishing, displaying, or printing any obscene, threatening, offensive, inappropriate, or illegal material.

Accessing accounts, files, or communications of others without appropriate authorization is prohibited. CA reserves the right to monitor network usage and to limit or block access for any user who uses excessive amounts of network resources or bandwidth. Attempting to impair the network or to bypass restrictions set by the technology department, circumvent any security or filters, obtaining another user's password or rights to another user's account, files, or e-mail is a violation of School rules and is, in many cases, also a violation of the law.

B. Privacy and Monitoring

CA reserves the right to inspect all electronic data and usage occurring over CA's network or on school property without prior notice. This includes individual computers, iPads, email accounts, local files, and cloud storage. To maintain a safe and secure network, CA may decrypt traffic passing through its network. As a result, employees should have no reasonable expectation of privacy in information sent over CA equipment or network and should not assume that any messages or materials on their device or CA's systems are private or that deleted messages, data, or information are necessarily removed.

In support of a fair and equitable learning and working environment, CA prohibits the misuse of technology in a way that unduly violates individual privacy. Accordingly, using certain types of concealed or visible recording devices (e.g., smart glasses, USB cameras, or pen cameras, etc.) is prohibited. Students may not capture, record, or transmit an image or video of any person without their permission or create a facsimile of that person for any purpose. The use of any recording equipment at any time in a locker room, bathroom, or locations in which inappropriate or privacy-violating images or audio could be obtained is prohibited. Video or audio recordings of classroom activities, students, or teachers are prohibited; exceptions are allowed with express permission by a teacher (only for educational or instructional purposes), with prior written consent of the Head of School, or if authorized by law enforcement in relation to an investigation.

Additionally, any photograph, image, facsimile of a person, voice recording, or video shared on social media, AirDrop, or on similar device-to-device transmission, that has the effect of harassing, sexually harassing, or embarrassing a member of the CA community is prohibited, regardless of whether that media was created on school grounds or at a school-sponsored event, and regardless of whether it was created with the intent to harass or embarrass.

C. Accounts and Passwords

Each employee is provided with a login to access CA's network, email, and other technology resources. Employees should guard their password and treat it as confidential information. Employees are responsible for any activity done on CA's system using their login information.

Employees must not share accounts or passwords with anyone else, including another CA employee. The only exception is an in-person request by a member of the CA technology department for assistance with troubleshooting or configuration of equipment. If for any reason an employee believes that their school account has been compromised or improperly accessed, they should contact the technology department immediately.

Multi-factor authentication is required for all employees on any cloud or web-based service including, but not limited to, Google. Multi-factor authentication will require a second factor (such as a text message or code) before allowing a user to login from a new device. All employees are required to change their password once a year.

D. Storage of Files and Documents

Employees should store all important documents and files in Colorado Academy's Google Drive. Google Drive is backed up daily and has multiple, built-in options for file recovery. The school does not provide any data backup for individual desktops, laptops, or iPads.

While the school recognizes that it can be difficult to separate personal and work activities, storing personal (non-work related) pictures, videos, music, and files on school devices and/or storage is not permitted.

E. Personal Identifying Information

No personal identifying information should be stored on school devices or storage except in extremely specific instances where the information is required by an administrative office and approved by the business office or technology department. Personal identifying information should never be sent by email unless it has been securely encrypted and should not be transferred to a personal (non-school-owned) device or account. Personal identifying information includes, but is not limited to:

- Social security numbers
- Bank account numbers
- Credit, debit cards, or pin numbers
- Driver's license number
- Passport numbers
- Passwords, pass codes, or security questions
- Student, employee or other identification numbers
- Medical information
- Biometric data

The school permits the following exceptions for all users for storing personal identifying information:

- Password managers that are specifically designed to securely store passwords and related information may be used on school devices.
- The use of secure biometric access control (such as a fingerprint sensor) that unlocks a computer, phone, or other device may be used on school devices.

Personal information (such as tax forms, medical records, etc.) should never be stored on school storage or devices.

F. Device Security

All laptops and iPads provided by Colorado Academy should use encryption to protect sensitive information in case of loss or theft. The encryption settings should not be disabled or modified.

All school computers are required to have a password lock that will activate automatically after a period of inactivity. For staff, the time limit should be fifteen (15) minutes or less. For faculty, the time limit should be thirty (30) minutes or less. School computers and devices should always be locked with a password or other security control when left unattended.

Personal devices such as mobile phones, iPads, and computers that are used to access school resources (e.g., email or grades) should be protected by a password, passcode, fingerprint, or other security mechanism. The school may require registration or other security measures on personal devices if they are being used to access school resources. Protected information should never be stored on a personal device (see E above).

G. Reporting an IT Security Incident

Employees must report any actual or suspected security incident to the technology department as soon as possible and no later than 24 hours after becoming aware of it. A security incident includes, but is not limited to:

- A lost or stolen school device
- Unauthorized access to a school account or system
- Personal or student information sent to the wrong recipient
- Student data entered into an unapproved application or service
- A successful phishing attack or malware infection

To report an incident, contact the technology department at ***help@coloradoacademy.org*** or by phone at 303-914-2525. Do not attempt to investigate or resolve the incident before reporting. Early reporting allows the school to take steps to limit exposure, notify affected parties if required, and meet any obligations under Colorado state law.

Employees who report incidents in good faith will not face disciplinary action for the underlying mistake. Failure to report a known incident, however, may itself result in disciplinary action.

H. Equipment

Colorado Academy may provide technological equipment, such as a laptop or iPad, to an employee for their lawful use in performing the responsibilities of their job. This use by the employee is intended for administrative, academic, and/or instructional purposes only. It should not be used for activities that are non-work related such as the storage of personal files (e.g., family photos or personal music/videos. All equipment, software, and hardware that is provided to employees will remain the property of CA. Employees are expected to use and maintain equipment appropriately, including all components, cords, and other accessories, and to keep all software and applications up to date as directed by the Technology Department. Employees must return equipment in good working order upon termination of employment or on request from Colorado Academy. Maintenance repair service for all equipment should be arranged with the Technology Department. Employees should not attempt any hardware repairs or any other act which may void the warranty of equipment without express permission from the Technology Department.

Employees are financially responsible for actual repair or replacement costs resulting from loss or damage due to misuse or abuse of school equipment. Employees are fully responsible for the use of equipment by others who they allow to use the equipment. The actual replacement cost for the equipment shall be the then-current actual price of similar equipment in terms of condition (i.e., quality, durability, and performance, including any upgraded models), or a similar model if the current one is no longer available due to changing product developments. The school will cover the cost of accidental damage that occurs to equipment during normal business use except in cases of gross negligence or intentional damage (as determined in the sole discretion of the school). A police report must be filed for items that are reported stolen.

Since employees' technology equipment may contain confidential information, it should solely be used by the assigned employee, and it is not appropriate to allow family members, students, or other individuals access to school equipment.

I. Digital Communication

All content sent via school email or posted on course pages, blogs, social media accounts, or other digital platforms reflects on the employee as a professional and as a representative of CA. The content of all messages and posts should be considered carefully with this in mind.

School email accounts (*first.last@coloradoacademy.org*) must be used for all communications with students, parents/guardians, and other members of the CA community. Personal email accounts must never be used for school-related communication. Email is not a secure or confidential medium; protected information (e.g., social security numbers, credit card numbers) must not be transmitted through email (see also section E above).

Email distribution lists should be used judiciously. Inappropriate uses include, but are not limited to, jokes, advertising, betting pools, and personal fundraising. Care should be taken to avoid replying to all recipients when a reply is intended only for the original sender.

Google Chat using a CA account (*first.last@coloradoacademy.org*) is the only authorized form of instant digital communication with students. Google Chat functions similarly to text messaging, but all messages are archived according to CA's retention policy. Google Chat is the appropriate communication method for sports teams, international trips, Interim, and other contexts requiring immediate correspondence. Email remains the recommended method when instant access is not

required. All instant digital communication with students must include a second adult employee, such as another teacher, an assistant coach, or a co-chaperone.

Personal cell phone numbers should not be shared with students and parents/guardians nor used to communicate with students and parents/guardians except in case of emergency where there is no reasonable alternative. Google Meet can be used for an audio or video call, should a student or parent/guardian need to speak with a coach, chaperone, or other adult employee. The School requires employees to use CA email accounts and other school systems to communicate with parents/guardians. In some situations, employees may choose to share their personal phone with parents/guardians for assisting with communication when on school trips or off campus activities.

For Interim and Global Travel, chaperones will be provided with an "on call" number to contact should they need support while in the field. For international trips only, WhatsApp can be used to create a group for the students and chaperones on the trip. WhatsApp allows members of the group to call when out of the country and location sharing can also be used should a student get lost and need immediate assistance. For global programs, parents/guardians are given the vendor's emergency number which is the best way to contact their child rather than going through CA's on-call person. For Interim, parents/guardians will be provided with the CA Experiential Ed On-Call Number (303-502-2298) should they have questions or need to reach their child.

J. School Sanctioned Services for Students

The school provides students with a Google Workspace Account (e.g., Gmail, Drive, Docs), a login for the school website, an Apple ID (Grades 2 through 12), and access to other electronic services. These accounts are managed by the school and subject to all applicable technology policies.

Employees may not use any third-party application or service that collects, stores, or transmits personal information of students or parents/guardians without prior approval from the Technology Department. This includes free web-based tools, apps, AI services, and any platform that requires students or parents/guardians to create an account or submit personal data – even if no payment is involved. Unapproved tools may expose personal data to third parties in ways the school cannot oversee or control and may put the school in violation of its vendor agreements and Colorado state student data privacy law.

Tools that do not require personal information and do not require account creation may be used, provided they are solely used for instructional or business purposes.

A list of currently approved applications and services is maintained by the technology department. Any tool whose approval satatus is uncertain should be verified with the technology department prior to use.

K. Phishing, Viruses, Malware, Spam and Attachments

Computers and accounts are often compromised through phishing attacks (fake email), web sites, or software downloaded from web sites. Please be careful when clicking on any links in email or downloading programs from the Internet. Employees are required to report any suspicious activity to the technology department immediately at ***help@coloradoacademy.org***. Spam should be reported using the "Report Spam" tool in the Gmail web interface.

L. Intellectual Property Rights and Software Licensing

Colorado Academy expects all employees and students to follow applicable copyright laws and respect intellectual property. Questions regarding permitted "fair use" of copyrighted works should be directed to the relevant divisional librarian or the Director of Technology.

All software must be properly licensed to be installed on school equipment. The technology department provides oversight of licensing for all software regardless of division or department. Please be aware of the following software purchasing policies:

- Any software that is purchased for more than one device (including computer labs or iPads) must be coordinated with and approved by the technology department.
- Any software that is purchased for a single device and costs at least $20 must be coordinated and registered with the technology department.
- Any software that is purchased for a single device and costs less than $20 may be purchased from department or classroom budgets but should be registered to the school (not an individual) whenever possible.
- AI subscriptions for the following services must be purchased through the technology department: ChatGPT, Perplexity, Claude, and Gemini. Please check with the tech department before purchasing any AI software, as this list will be continually updated.

M. Printing

Printing costs are billed directly to departments and/or divisions for both copiers and printers. Toner and ink for all printers and copiers should automatically be sent to the appropriate building when running low by our contracted provider. CA has contracted with an outside company to provide all of our toner at a significant discount. Employees are not permitted to purchase their own toner, ink, or printers without permission from the technology department. Email ***help@coloradoacademy.org*** to request a toner replacement (with the location of the printer).

N. Email, Chat, and Voice Mail Retention

This email retention policy is intended to help employees determine what information sent or received by email should be retained and for how long.

Employees are encouraged to manage their email on a regular basis. Generally speaking, email communication with recipients and senders both internal and external to Colorado Academy should not be saved unless there is a legitimate business reason for doing so, or the subject of the email corresponds to a type of record identified by the *Colorado Academy Student Record Retention Policy* or the *Colorado Academy Personnel and Payroll Record Retention Policy*.

Emails for employees will be retained by CA for four (4) years in accordance with CA's retention policy. Any emails remaining on school servers and in employee mailboxes after four (4) years, irrespective of content, sender, or recipient, shall be automatically deleted from user's mailboxes and the Colorado Academy email servers.

Because email is automatically deleted, it should not be used as a long-term storage solution. Emails or attachments needed for longer retention should be printed and filed appropriately, or saved to Google Drive.

Any email related to a student safety concern – including but not limited to physical safety or mental wellness – or to a student discipline matter should be printed and forwarded to the relevant divisional principal or department director as soon as possible, and in all cases before the automatic deletion window described above.

Google Chat messages will be retained for a period of four (4) years. Any chat messages remaining after four (4) years, irrespective of content, sender, or recipient, shall be automatically deleted from Colorado Academy servers.

Voicemail messages are not retained unless an election has been made to forward voicemail messages to an employee's email account. If the voicemail message is forwarded to email, the email retention policy described above applies.

These ordinary deletion and destruction practices and procedures shall be suspended to comply with the obligations related to anticipated or actually filed litigation, or government investigation or audit.

O. Social Network Use

1. Course/Professional Use

To provide equal, age-appropriate access to course materials, faculty should limit class activities to school-sanctioned online tools. New social networking tools and features are introduced continuously, and their appropriateness for instructional use varies. Any networking tool believed to have potential classroom value should be brought to the attention of the Technology Department for review before use.

Neither employees nor students are authorized to create social network accounts using Colorado Academy's name or logos. Official social network accounts must be created or authorized and monitored by the office of Marketing and Communications or the Head of School.

2. Personal Online Activities

CA respects the rights of students and employees to engage in free and open communication of their personal information through the individual use of weblogs, internet diaries, social websites like Facebook, X, LinkedIn, Vimeo, Instagram, Snapchat, and other forms of online discourse ("Personal Online Activities").

Students and employees should be mindful of privacy settings. Because each student and employee represents the school, Personal Online Activities should be in good taste. Personal photos, especially, should be filtered for appropriateness. Unless privacy settings are manually changed, every person should assume that their personal information could be accessed by anyone on the Internet.

Also, please remember that once content is posted online, it may be redistributed through the Web or other media channels. Older versions or information may continue to exist even if the content is deleted or modified.

The content of Personal Online Activities may not contain:

- Any reference to confidential or privileged information or activities of Colorado Academy students or their families, whether by name or implication;
- Any reference to a Colorado Academy student including names, photos, and videos;
- Any reference to Colorado Academy students, employees, or trustees whether by name or implication, which would constitute defamation in any manner;
- Any reference to confidential or privileged information or activities of Colorado Academy employees or trustees;
- Any material that in the sole discretion of CA is considered obscene, defamatory, threatening, harassing, illegal, or abusive to any person or entity associated with Colorado Academy;
- Any material that is profane, pornographic, obscene, indecent, lewd, vulgar, or sexually offensive language, pictures or graphics or other communication that could be anticipated to cause a substantial disruption to the school environment;
- CA's logo or other copyrighted material of Colorado Academy without express, written consent from CA;
- Internet postings which libel or defame the Board, individual Board members, students, or other school employees;
- Content which intends to harass, bully, or intimidate employees or students.

Students and employees may not create fake accounts or profiles that use another's name, likeness, or other personal details. They also may not share false or misleading information about other individuals on social media.

3. Friending

Employees may not initiate or accept social network connection (i.e., "friend" requests) with current students, former students under the age of eighteen (18), or current school parents/guardians. Professional discretion should be exercised when connecting with alumni who are 18 or older, with the understanding that the unequal power dynamics inherent in school relationships continue to shape interactions with former students even after their enrollment has ended.

All members of an employee's social network should be reminded of the employee's role as an educator whose profile may be accessed by current or former students, and encouraged to monitor their posts accordingly. Employees should exercise similar judgment in their own posts to others' profiles, act promptly to remove any inappropriate material from their own sites, and request the removal of inappropriate material involving them from others' sites.

4. Social Network Groups

Employees who participate in online social networking groups are expected to engage only in healthy, pro-social activities consistent with CA's mission and reputation, and to conduct themselves with sensitivity within a diverse educational community in which both students and adults are expected to practice tolerance and respect for differing perspectives.

5. Privacy Settings and Content

Exercise care with privacy settings and profile content. Content should be placed thoughtfully and periodically reviewed. In addition, know that privacy settings can be changed at any time to limit access to profiles and searchability to content, and that changes should be made accordingly.

6. Public Information

Recognize that former students may have online connections with current students, and that information shared between school adults and former students is likely to be seen by current students as well.

7. Time on Social Sites

Social networking sites should not be accessed for personal use during work hours. This activity should be limited to time outside of regular working hours.

8. Off-duty Use

This Social Network Use policy does not prohibit lawfully protected communications regarding an employee's off-duty political, recreational, or other legally protected activities.

P. Use of Generative Artificial Intelligence (AI)

Employees are permitted to use AI to assist with their work but remain responsible for ensuring all content is accurate, appropriate, and reflects their personal judgment. AI tools may support work including drafting communications, creating lesson plans and educational materials, reviewing documents, generating images, performing analysis, and brainstorming ideas. AI outputs must be used as drafts or templates, not final products.

1. Assessment, Grading, and Student Feedback

Colorado Academy prioritizes personalized feedback to facilitate student mastery. Teachers may use AI to enhance feedback but remain ultimately responsible for all assessment:

- All feedback must authentically reflect the teacher's assessment of the work.
- Teachers will not allow AI to determine a student's final grade on an assignment.
- Student comments must reflect genuine observations and be personalized to the individual.

2. Publishing and External Work

When creating content for publication or external distribution, consider disclosure requirements and comply with any AI guidelines imposed by publishers or partner institutions. Verify all facts and citations before publication.

3. Recording and Transcription

AI transcription tools may be used during meetings only when all participants are notified in advance. All recordings must comply with school privacy and data security policies.

4. Data Security and Privacy

Prohibited Information: Never input the following into any AI tool:

- Social Security numbers;
- Credit card numbers or financial account information;
- Driver's license or government ID numbers;
- Medical records or health information (HIPAA/FERPA protected);
- Passwords or authentication credentials; or
- Proprietary or confidential business information.

Content Allowed on School-Approved AI Accounts Only:

- Basic constituent information (names, birth dates, addresses).
- Sensitive information (that is not listed under prohibited information).

This information may be used only in school-approved accounts with data processing agreements. All use of student information must comply with applicable privacy laws. Consult the technology department or administration when in doubt.

Only these services are school-approved:

- Google Gemini – when logged in with a CA Google account
- ChatGPT – Colorado Academy ChatGPT for Teachers or school-managed paid account
- Claude – school-managed paid account only

Other AI services may be used as long as no prohibited or personal information is entered (see above).

5. Professional Standards

All AI-generated content must be reviewed and revised for accuracy, appropriateness, and potential bias prior to use. Employees are expected to maintain their professional voice and expertise, exercise independent judgment, and refrain from deferring decisions to AI systems. All facts, sources, and citations must be verified before use.

6. Prohibited Uses

- **Deepfakes and unauthorized likeness**: The creation of fictitious representations of any member of the CA community in either video or audio (often referred to as "deep fakes") will likely end in dismissal or termination, regardless of intent. Taking another person's likeness and using it in ways that might be damaging or untruthful is a violation of the school's mission.

- **Harmful content**: Discriminatory, harassing, defamatory, or threatening content.
- **Automated sensitive decisions**: Using AI for final decisions on discipline, evaluations, or admissions without human judgment.

7. Training, Support, and Policy Updates

The school provides professional development on AI use. Contact the technology department with questions about appropriate use, account setup, or data security. This policy will be reviewed regularly; employees are responsible for staying current with updates.

Q. Technology Support

Contact the Technology Department at ***help@coloradoacademy.org***.

R. Other Responsibilities

Employees should read the Technology Use Agreement for students and support the privileges, responsibilities and restrictions outlined for student use of technology. Personal devices brought to school by students are subject to the same rules as computers owned by Colorado Academy, and employees are requested to monitor student use of personal devices. When Middle and Lower School students access the Internet, they should be monitored by an adult who is present in the classroom, library, or computer lab. It is requested that employees provide the same safeguard for Upper School students.

Employees are required to fully comply with any school-published records retention or destruction policies and schedules. If there is reason to believe or if the school communicates that school records are relevant to litigation or potential claims, those records must be preserved until the school determines the records are no longer needed.

Employees should be aware of guidelines for publishing student names and photos on web pages. They should not publish names or photos of students listed on the "do not publish" list, unless in a password-protected portion of the school website.

Faculty must maintain a course page and post major assignments, tests, and projects. Daily/weekly assignments and other information, pictures, links, etc. are strongly encouraged. The course page should also contain a course overview and curriculum information on units of study (Topics).

Employees must not unplug or change the location of school landline phones. Phone location is determined by the specific port to which each unit is assigned, and phones serve a critical function in emergency paging. Any need to move aphone to a different location should be directed to CA Tech Support.

S. Policy Violations

Consequences for violations of this policy include, but are not limited to, disciplinary action by administration, including dismissal from employment, and referral to law enforcement, legal action, and prosecution by the authorities.

T. Disclaimer

Colorado Academy's computer technology, network and internet system is to be used for educational and professional purposes. There is no assurance of privacy or warranty of any kind, either expressed or implied, nor that all services provided through this system will be error-free or without defect. CA does not guarantee the functioning of any computer, iPad, server, or network, and it is not liable for any service interruptions or inconvenience, including lost data sustained in the use of any computer, iPad or other hardware or software. Colorado Academy specifically denies any responsibility for the accuracy or quality of information obtained through the internet.

XII. TERMINATION OF EMPLOYMENT

A. At Will Employer

Employment with CA is at the mutual consent of CA and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice, except as otherwise provided by law. This is commonly referred to as an "at will" employment arrangement. Accordingly, all CA employees are "at will" and appointment letters do not create a contractual agreement of employment.

B. Employee Responsibilities

An employee whose employment with CA is terminated for any reason must return all school property including, but not limited to, keys, ID badges, purchasing/credit cards, mobile phones, uniforms, tablets, and laptop computers on or before the last day of employment. Employees are expected to schedule an exit interview with Human Resources and return school property at that time. Records, files, documents, correspondence, and other CA property may not be deleted or removed from the premises. Employees leaving CA may not destroy, copy, or use CA records, files, documents, correspondence, computer disks, or other property of CA.

C. Continuation of Insurance Coverage (COBRA)

Employees who leave CA may continue certain insurance coverage under the Federal act known as COBRA. Full details on which coverage may be continued, and eligibility may be obtained from Human Resources. At termination, COBRA information will be mailed to employees and eligible dependents.

Instead of enrolling in COBRA insurance continuation coverage, there may be other insurance coverage options available for former employees through the Health Insurance Marketplace, Medicaid, or other group health plan coverage options (such as a spouse's plan) through what is called a "special enrollment period." Some options may cost less than COBRA insurance continuation coverage; learn about these options at ***www.healthcare.gov***.

D. Resignation

Resignations by employees are deemed to be voluntary. Although employees are "at will" and may terminate their employment at any time, with or without notice, employees who decide to resign are requested to submit a letter of resignation to both their supervisor and Human Resources. The letter should contain the reason for resignation and the date the employee plans to leave. CA requests the customary minimum period of at least two weeks' notice; employees who do not provide at least two weeks' notice are not eligible for rehire.

Employees who fail to return from an approved leave of absence on time or fail to report to work for three consecutive business days without notifying their supervisor may be considered as having abandoned their employment and will be terminated. Further, employees with School-Year Appointments who fail to return from summer break will be considered as having abandoned their employment, and their termination date will be retroactively adjusted to the final day of on campus responsibilities from the prior academic year. In this situation, any employee benefits received beyond the retroactive termination date (i.e., benefits received during summer break) must be repaid to CA via deduction from a final paycheck or another arrangement made directly with Human Resources.

E. Elimination or Change of Position

CA may, from time to time, find it necessary to eliminate a position, change or expand the responsibilities of a position, or replace a position with a new position requiring different responsibilities. Employees will be notified as early as possible and, in certain cases, an employee may be terminated if they are no longer qualified for the new/changed position.

F. Non-Performance and Misconduct

Occasionally performance or conduct falls short of our standards and/or expectations. When this occurs, disciplinary actions can range from a formal discussion with the employee about the matter to immediate termination. Action taken by CA in an individual case should not be assumed to establish a precedent in other circumstances.

The following conduct described below is expressly prohibited. These examples are not meant to be all-inclusive, but merely illustrative. Any violation of CA's policies or any conduct considered inappropriate or unsatisfactory may, at CA's discretion, subject the employee to disciplinary action up to and including termination.

- Theft of CA property, the property of fellow employees, students or other third parties.
- Unauthorized possession, removal, or destruction of any CA property, including both physical and digital documents under our care, without prior permission from the school.
- Unauthorized use of CA equipment, employees, property, or other resources for personal reasons or for personal profit.
- Engaging in an act of sabotage causing the destruction or damage of CA digital or physical property, or the digital or physical property of fellow employees, students, suppliers, visitors, or others.
- Engaging in criminal conduct or acts of violence or making threats of violence toward anyone.
- Fighting or horseplay or provoking a fight.
- Threatening, intimidating, bullying, or coercing fellow employees or other school constituents, whether on or off the school's premises.
- Refusal to interact or speak with fellow employees in a professional and respectful manner.
- The possession of firearms or other weapons on CA property or while conducting business on behalf of CA (with the exception of approved armed security personnel).
- Substandard, reckless, or unsafe work performance.
- Reporting to work under the influence of alcohol, marijuana, or other drugs that are unlawful under either federal or state law.
- The use, sale, dispensing, or possession of alcohol, marijuana, or other drugs that are unlawful under either federal or state law.
- Insubordination or refusing to obey instructions properly issued by a supervisor or supervisor's designee as it pertains to an employee's work.
- Disclosure of confidential information without authorization.
- Any act of harassment - sexual, racial, or other.
- Telling sexist or racial jokes or making racial or ethnic slurs.

- Excessive tardiness or absenteeism or any absence without notice or authorization.
- Dishonesty (written or verbal), intentionally withholding key information, or the falsification of any records including, but not limited to, timekeeping records, employment application, signature forgery, or any information requested for legitimate business reasons including, but not limited to, lying about sick leave or falsifying a reason for a leave of absence.
- Acts of retaliation against any employee bringing a legitimate concern to school administration including, but not limited to, hostile or disparaging remarks, social exclusion, interference with job duties, or any other adverse conduct directed at a reporting party.
- Engaging in inappropriate adult-student boundary violations

XIII. SAFETY AND SECURITY

All Colorado Academy employees share the responsibility for maintaining a culture of safety centered on continuous learning and transparency. This cultural framework is designed to integrate both employee and student safety into every level of our operation. Core tenants of a culture of safety include:

- Leadership commitment to establish safety as a core value that is never compromised for competing goals;
- Employees are encouraged to report errors or "near misses" without fear of punishment in an environment where everyone feels comfortable speaking up when they potentially see a hazard;
- Employees from all departments are encouraged to work together to find safety solutions by openly discussing safety issues with each other, students, and their families, to maintain trust; and
- Continuous improvement by using reported incidents as data to proactively refind work processes and technologies.

Employees are required to adhere to CA safety rules and report unsafe conditions or hazardous activities of other employees to their Department Head, the Director of Risk Management, or other CA administrators within 24 hours. Constant awareness of, complying with, and respect for this policy is a condition of employment.

A. Animals on Campus

Animals, other than ADA service animals, are not allowed on campus between 7:00 am and 4:00 pm; this includes the main campus, all athletic fields, the Dos Chappell Trail, and the REDI Lab. At all other times, animals are allowed on campus, subject to the following rules:

- Animals must always be kept physically restrained (e.g., on a leash).
- Owners are responsible for cleaning up after their animals.
- Owners are personally liable for all incidents involving their animals including, but not limited to, property damage, personal injury, fights with other animals, and severe allergic reactions.

Animals left unattended in vehicles for periods longer than five minutes must be reported to the Safety and Security team. If an animal is found in a vehicle on campus, the Safety and Security team will first attempt to locate the owner. Law enforcement may be called if the situation calls for emergency action, and Colorado law protects individuals who cause damage to vehicles to protect or save animals locked in cars. CA is not responsible for damage to vehicles that fall under this protection.

B. Biometric Information

Colorado Academy collects and uses biometric information in limited circumstances in support of security operations and technology infrastructure. Biometric information includes physiological identifiers used to identify an individual, such as fingerprints, facial geometry, and voiceprints.

By accepting employment at CA, employees acknowledge and consent to the collection and use of biometric information in the following contexts: fingerprint and facial recognition sensors on school-issued devices for authentication (processed locally on the device only); video surveillance systems that may employ facial recognition for safety and security purposes; and photo

management platforms that may use facial recognition or tagging technology to organize school event imagery. Consent for student biometric data is addressed separately through CA's enrollment and media consent processes.

Biometric information will be protected using reasonable security measures and will be permanently destroyed when no longer needed or upon an employee's departure from CA. CA will not sell or profit from biometric information under any circumstances, and will not disclose it to third parties except to complete a requested transaction, as required by law, or to protect health and safety. Where third-party vendors process biometric information on CA's behalf, CA will seek to maintain written agreements prohibiting the sale or unauthorized disclosure of that data. Employees may not engage new vendors that collect biometric information without prior approval from the technology department.

Employees may not collect or share biometric information about students or colleagues using personal devices or unapproved applications. Any suspected misuse should be reported to the technology department as a security incident.

C. Drug-Free School

1. Students

Colorado Academy has explicit school policies prohibiting student use of alcohol, tobacco, or other drugs on the school campus or at school-related activities. These rules are found in the Student/Parent Handbook.

2. Employees

CA prohibits the use, sale, purchase, manufacture, possession, transfer, or receipt of any drugs that are unlawful under either Federal or State law, or being under the influence of drugs or alcohol, during working time or at any time while on CA property, in a school-owned or leased vehicle, or at a school-sponsored activity. Unlawful drugs confiscated from an employee may result in criminal prosecution.

Subject to the policy on compliance with the Americans with Disabilities Act, the use, or being under the influence, of any over-the-counter or legally prescribed drug by any employee during working time or at any time on CA property, or in a school vehicle, or at a school-sponsored event is prohibited if such use or influence may detrimentally affect or impair the safety of co-workers, students, members of the school community, or the employee’s job performance. Employees should obtain information from a physician regarding any potential impairment which may be caused by such medication. When impairment potential exists, employees must inform their division principal or department supervisor.

Employees must notify Human Resources within five (5) days of their conviction, plea of “no contest,” or imposition of a sentence for a violation of any Federal, State, or local criminal statute involving the manufacture, distribution, dispensation, use, or possession of any controlled or illegal substance.

As a condition of employment, all employees must consent to a chemical test of their blood, urine or breath upon the request of Human Resources. This test shall be ordered in the event there is reasonable suspicion to believe the employee is under the influence of alcohol or

drugs. Any test shall be conducted at a hospital, clinic, or facility properly equipped to administer such tests and shall be performed by any doctor, nurse or technician properly qualified to administer such tests. The employee may not select the physician or technician to administer the tests. All such tests shall be paid for by CA. Employees who are identified as having prohibited substances in their systems may be disciplined, up to and including termination. Refusal to submit to an immediate drug and alcohol test shall result in: (a) immediate suspension without pay, or (b) termination of employment.

D. Emergencies

Colorado Academy has an Emergency Response Plan (ERP) to provide procedural guidelines in the event of an emergency, which is easily accessible online and via all smartphones. All employees are required to sign and acknowledge that they have read and understand the contents of the ERP. Employee training on various topics within the ERP is required on an annual basis. While this section provides some key information for emergency situations; the ERP covers more comprehensive details on CA's policies and procedures related to our response to a variety of emergencies. Accordingly, this Employee Policy Book should be read in conjunction with the ERP.

During emergencies or crises, all external communications on behalf of Colorado Academy must be coordinated through the Head of School or Director of Marketing and Communications. Employees may not communicate with the media, post on social media, or speculate publicly about incidents involving the school. Employees are expected to exercise discretion and follow confidentiality obligations during and after crisis situations.

1. Standard Response Protocol

Colorado Academy's Standard Response Protocol (SRP) for crisis events is based on five response actions: ***Secure, Lockdown, Evacuate***, ***Hold***, and ***Shelter.*** Depending on the type of incident, one or more of these four actions of the SRP will be the appropriate response. The decision to initiate the SRP rests with the Head of School and Director of Risk Management.

- A ***Secure*** status consists of moving all students, parents/guardians, and visitors who are outdoors into a school building, locking all entrances, and denying access to any unauthorized person. Within the locked building, school business continues as usual.
- A ***Lockdown*** is initiated when there is a threat or hazard inside the building. Emergency communication systems will be used to provide detailed instructions. The key terms for every employee and student should remember in a ***Lockdown*** procedure are "***Locks, Lights, Out of Sight***."
- ***Evacuate*** status is used to move students, employees, and visitors out of the buildings. This emergency response is used when the location of a potential threat is known, and the evacuation route moves people away from the threat to a designated safe area. The sounding of the fire alarm typically signals the need to ***Evacuate***. Ruvna and/or public address systems will be used along with a fire alarm to communicate an evacuation which follows a ***Lockdown*** situation.
- ***Hold*** status is called when students and employees need to remain in their current location, often due to a situation in the hallways or elsewhere in the building that

requires clearing movement. Normal activities continue inside classrooms, but halls and common areas must remain clear until the "All Clear" is given.

- ***Shelter*** status is called when the need for personal protection is necessary, typically used in the case of weather emergencies. See the Weather section below for additional information related to specific weather emergencies.

2. Reporting

Emergency situations requiring a first responder should be immediately reported to 9-1-1 with a follow up call to security at (303) 914-2550 when safe to do so. Suspicious activity and other non-emergency situations where assistance is needed can be reported directly to security via telephone, two-way radio, or ***security@coloradoacademy.org***.

CA uses an electronic ***Incident Report*** to gather details and document what happened and who was involved. An Incident Report must be completed by an employee within twenty-four hours of an incident. At a minimum, Incident Reports must include:

- ***What:*** Type of incident, including a detailed description of what happened and pictures as appropriate;
- ***Who:*** Names and contact information for all individuals involved including victims, perpetrators, witnesses, law enforcement, and the individual making the report;
- ***When:*** Date and time the incident occurred; and
- ***Where:*** Specific location of the incident, including street address, building or field names/numbers, maps, drawings, etc.

3. Debriefing

A post-incident debriefing should be conducted immediately after an incident is resolved when memories are fresh. The debrief incorporates a non-blaming, respectful discussion of the event that is focused on facts and team actions as well as how participants are feeling emotionally after the event. Discussion points may include:

- What went well?
- What could be improved?
- What were the technical and emotional challenges?
- Was communication effective to all who were or should have been involved?
- Does anyone need additional support?

E. Fishing

Woody's Pond is a protected environment and a learning classroom. Swimming, ice skating, fishing, boating, or other activities which could harm this student learning environment are prohibited unless sanctioned as an official school activity. In addition, CA students are prohibited from similar activity in the pond at Pinehurst Country Club, which is adjacent to Woody's Pond and also prohibits fishing by anyone, including golfing patrons and those living in their community.

F. Food Deliveries

During school hours, students are not permitted to request food deliveries on campus premises. Employees can order food for personal consumption but must pick it up from the Welcome Center. The responsibility of collecting the food orders from the Welcome Center lies with the individual who placed the order. The operating hours for collecting food orders are from 7:15 am to 3:15 pm. Please note that CA is not responsible for any unclaimed food or misplaced orders.

G. Identification Badges

Employees are required to wear a school-issued identification badge at all times during the school day. Badges must never be lent to others, including fellow CA employees. Allowing another person to use an employee's badge to enter a building is equivalent to sharing a password to a CA school account and may result in disciplinary action. Lost badge must be reported and replaced immediately to ensure the old badge is deactivated.

H. Injuries at Work

An employee who is injured while working must report that injury immediately to their supervisor and to Human Resources within 24 hours of the occurrence of the injury. Colorado state law requires timely filing of reports when employees sustain injury in connection with their employment. Failure to file the required report subjects CA to penalties and can result in the denial of benefits to the employee.

Injured employees should visit one of the designated medical providers for on-the-job injuries. Employees who sustain serious injuries may go immediately (or be transported by ambulance) to the closest emergency room. If an employee is not able to operate their own vehicle, transportation will be arranged.

I. Ride Sharing Services

Individuals using ride sharing services (e.g., Uber, Lyft) must instruct their rideshare drivers to park, pick up, and drop-off in the designated spaces marked for ride sharing which are located near the Welcome Center. Ride shares are not allowed to enter campus beyond these designated spaces. It is the responsibility of the employee to communicate correct directions for pick-up and drop-off at the Welcome Center as the rideshare vehicle will not be allowed on campus beyond these designated spaces. CA is not financially responsible for ride sharing charges or cancellations due to errors in directing a ride share to the designated pick-up and drop-off spaces.

J. Tobacco

For the health and comfort of employees and students, CA has a smoke-free workplace policy. This means that smoking, vaping, and use of any other tobacco products are not permitted on campus.

K. Transportation While on School Business

To drive school-owned or rented vehicles on school business, an employee must be at least twenty-one (21) years of age, are required to have a valid driver's license, and an acceptable driving record. To transport students in any vehicle, the employee must also be at least twenty-five (25) years of age. Motor vehicle records (MVRs) will be checked regularly for all employees authorized to drive a school-owned or rented vehicle. Employees will not be authorized to drive school vehicles or to transport students in an employee-owned vehicle if their driving record includes:

- Driving while intoxicated or impaired or under the influence of drugs within the last five years;
- Major violations in the past five years (e.g., reckless driving or careless driving citations);
- Speeding more than twenty (20) miles per hour over the speed limit;
- More than three moving violations or two at-fault accidents in the past three years; or
- For any other safety concern, at the sole discretion of the school.

Employees must drive safely and obey all state and local traffic laws. Tickets for traffic violations and illegal parking are the personal responsibility of the driver and should be resolved immediately. With the exception of using GPS for directions, mobile phone use is not allowed when driving any school vehicle or when transporting students in any vehicle. Any accident/incident in which a school-owned or leased vehicle is involved, or which occurred while on school business or while transporting students, must be reported immediately using an electronic ***Incident Report***.

School-owned vehicles are equipped with tracking devices and/or cameras that monitor safety such as speed, hard braking, and GPS location; employees found to be in violation of traffic laws or safe driving practices will be subject to disciplinary action up to and including termination.

Employees who drive their own vehicles on school business are required to have personal insurance coverage with at least the minimum dollar amount and types of coverage required by the State of Colorado. If an employee is involved in an accident in their personal automobile while on school business, the employee's personal auto insurance provides the primary coverage for both liability and property damage. CA provides auto insurance coverage to employees when operating school-owned vehicles and as secondary coverage when using a personal vehicle.

CA also provides transportation services for the convenience of parents/guardians and students, in support of academics, athletics, arts, interims, outdoor education and other programs. Employees who take students off campus are required to adhere to the following guidelines:

- At least one CA employee must accompany students on all field trips. This employee must ride the school bus with their students to and from the trip site.
- Students are required to wear seat belts (when available) and sit in a rear seat.
- CA buses are the preferred mode of conveyance. Use of employee, student, and/or parent/guardian vehicles should be avoided. Only in emergency circumstances, and with the express approval of the Division Principal or Head of School, should students be allowed to operate their own vehicles to and from a field trip, or transport other students with them to and from school-sponsored activities.
- Employees who drive school vehicles for any reason must be on CA's approved drivers list which requires a recent motor vehicle record (MVR) background check and participation in annual driver training (typically held during professional development in August.)
- When an employee uses their personal automobile for school business, the employee's auto insurance provides the primary coverage, should an accident occur.
- Except in the event of an emergency, transportation of students in employee-owned vehicles is discouraged. Advanced approval from a supervisor is required before transporting students in personal vehicles.

L. Vehicles

All regularly driven vehicles must be registered with CA Safety and Security and have a vehicle permit sticker affixed to the inside of the driver's side windshield. The sticker should be at the upper edge but below dark window tinting so that it is easily seen by security officers at the Welcome Center on arrival to the campus. Short term access to the campus for less than two weeks can be gained by showing a CA ID Badge to security officers.

M. Video Surveillance

The school uses video surveillance to assist in promoting safety and security on its property (including school-owned vehicles) for the benefit of its employees, children, volunteers, and visitors. Therefore, all people on campus are advised that they will be subject to video surveillance while on school property and while in and around school-owned vehicles.

There are video cameras located throughout the campus and on school-owned vehicles for remote security monitoring. Cameras on campus are not typically monitored in real time. As a result, employees and others on CA property should not have an expectation that they are under continuous surveillance when they are in the range of a camera and should not rely upon the presence of a camera to protect them from harm or to alert others to a dangerous situation.

Video monitoring is conducted in a manner consistent with all existing school policies including, but not limited to, the school's non-discrimination and sexual harassment policies. Video monitoring of the facilities is limited to uses that do not violate the standard of a "reasonable expectation to privacy" as defined by law.

All video recorded by the school is for school use only. Video will not be used for such things as family custodial issues, student conduct review, or for any purposes other than in support of safety and security. Information obtained through video monitoring will be used exclusively for security and/or law enforcement purposes. Video will not be made available to anyone other than the school administration without a subpoena or a law enforcement request or at the discretion of the Head of School.

N. Visitors

CA recognizes the importance of engaging the community in our school and the importance of school/community partnerships yet also recognizes concerns for the welfare of our students and employees. Therefore, CA limits visitors on its campus to:

- Parents/guardians of current students;
- Other family members of current students who are approved by the student's parent/guardian;
- Board and Board Committee members; and
- Guests who are invited to CA by the Head of School or his/her designee(s) for educational or official business purposes. CA guests include, but are not limited to, prospective students and their families, alumni, former employees, volunteers, vendors, and facility rental users who hold contracts for use of CA property.

Employees must register all visitors 24 hours prior to their scheduled appointment using the ***Visitor Notification Form*** located on the CA Safety and Security intranet page. Pre-registration helps the

Campus Safety team prepare to greet guest(s), ensures unauthorized persons are identified and prevented from entering, and ensures we have a record of all visitors.

All visitors at CA from 7:15 AM to 3:30 PM must check in with security at the Welcome Center to receive their visitor badge, parking directions, and other guidance provided by the visit sponsor in the Visitor Notification Form. Once a visit is completed, the visitor is expected to immediately depart and cannot visit any other part of CA's private property including, but not limited to, all buildings, grounds, playgrounds, athletic fields, school-owned vehicles, and trails.

Authorized visitors may be required to:

- Present government-issued identification and submit to screening with a national sex-offender registry;
- Sign in and sign out while on campus;
- Wear nametags and/or identification badges at all times while on campus to identify them as visitors; and
- Be accompanied by a CA employee for some or all of the visit.

School administrators may approve additional building procedures pertaining to school visitors to preserve a proper and safe learning environment. Visiting CA is a privilege, not a right, which may be limited, denied, or revoked by the Head of School or his/her designee(s) based on considerations of student and/or employee safety and health, efficient school operations, maintenance of a proper educational environment, or failure to comply with this policy.

O. Workplace Violence

Colorado Academy is invested in the well-being and safety of the entire school community. Whenever the school is made aware of any student or employee who is at risk, or if their safety or health is in jeopardy or threatened, CA will respond accordingly to protect the safety and welfare of the individual(s) at risk, as well as the school community. If a member of the Colorado Academy community is aware of any student or employee who may be a danger or threat to themselves or others, or if a student or employee's behavior or presence poses an immediate or continuing threat or disruption to the educational process of the school, the individual with this knowledge is required to immediately notify a school administrator so appropriate action may be taken. The Head of School shall have the authority and discretion to impose disciplinary and/or therapeutic measures on the individual at risk, to preserve the welfare and safety of the school community.

CA is strongly committed to providing a safe workplace for all employees and students and strives to minimize the risk of personal injury to employees and damage to CA property. Those who are at risk of being victimized by domestic violence or threats from others should alert the Safety and Security team to enable further assessment and mitigation measures needed to protect the CA community. CA discourages employees from engaging in any physical confrontation with a violent or potentially violent individual.

1. Definition

Workplace violence is defined as conduct in the workplace against individuals by people who either have an employment-related connection or are outsiders involving:

- Physical conduct, which typically involves the use or presence of force;

- Verbal conduct, which involves verbal abuse or threats against people or property and abusive verbal outbursts;
- Visual conduct, including making bodily gestures that are threatening or abusive to people; or
- Written conduct, which includes using a written medium to threaten property or threaten to abuse people.

2. Zero Tolerance

Threats, threatening language, or any other acts of aggression or violence made toward or by any employee will not be tolerated. Examples of a threat would include any verbal or physical harassment or abuse, attempts at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking, or any other hostile, aggressive, injurious, and/or destructive actions. Employees who violate this policy are subject to disciplinary action, up to and including termination of employment.

3. Procedures for Reporting

All employees have, as a condition of employment, the responsibility to report actual or potential acts of violence as soon as they become known or suspected. Employees who either witness any workplace violence or have concerns that such violence may occur have the responsibility to take any acts or threats of violence seriously and follow these guidelines in reporting threats:

- Notify Human Resources or the Director of Risk Management, either in person or in writing, and preferably by completing an ***Incident Report***.
- The following information shall be reported in the complaint:
  - The name, work location, address, and telephone number of each complainant;
  - The name of each person alleged to have perpetrated the harassment;
  - The location where the harassment occurred, whether on or off campus; and
  - A description of the nature of the harassment, including what happened and the date of the event.
- The identity of employees who report violence shall be kept confidential, except to the extent necessary to investigate the complaint.
- No employee who reports violence, including a complaint of harassment or any person who testifies, assists, or participates in any manner in any phase of the investigation of a report of complaint or who cooperates in any effort to respond to a report or complaint, shall be intimidated, threatened, coerced, or subjected to any retaliation.
- Any employee who violates this guideline will be subjected to immediate disciplinary action up to and including termination.
- If an investigation confirms that a threat of a violent act or violence itself has occurred, CA will take appropriate corrective action with the offending party.

APPENDIX A

Aspiring for Excellence in Teaching & Learning
Colorado Academy Faculty

Curriculum Planning & Preparation

- possesses extensive and current knowledge of content
- designs units with learning objectives and instructional goals
- designs innovative units and lesson plans to meet instructional goals
- considers specific scaffolding of skills, content, and learning objectives
- creates varied assessments that accurately measure student growth and checks for understanding
- collaborates with colleagues and teaching teams to develop and enrich curriculum
- plans lessons and units that prioritize belonging
- incorporates multiple perspectives and the range of human experiences relevant to the content
- reflects on teaching practice and takes action to maximize student learning through professional development

Classroom Environment

- models and promotes Colorado Academy's mission and values to create kind, curious, courageous, and adventurous learners and leaders
- fosters classroom environment and uses materials and content that support a sense of culture, community, and belonging for all Colorado Academy students
- designs accessible physical space that enhances community and meets the needs of various learners
- manages classroom to maximize equitable student engagement and learning
- communicates classroom expectations clearly
- collaborates with students in a process of feedback and reflection
- balances curricular goals with student wellness

Delivery of Instruction

- implements and delivers instruction with learning objectives and instructional goals
- communicates expectations, criteria, and learning objectives clearly and accurately
- facilitates discussion through inquiry and questioning
- creates dynamic connections between students and the curriculum
- implements a variety of instructional practices and pedagogy
- scaffolds learning to support student growth
- integrates technology effectively to share and deliver curriculum
- provides timely, relevant, and helpful feedback to students
- uses a variety of assessment tools which may include, but not limited to, formative, summative, peer, and self-assessment
- identifies, supports, and responds to varying student needs through differentiated instruction
- models curiosity, demonstrates flexibility and a growth mindset; recognizes and acts on "the teachable moment"
- practices culturally responsive teaching and shows the awareness to help students to flourish
- creates opportunities for students to think critically, practice empathy, and engage in civil discourse appropriate to the content

Professional Responsibilities

- demonstrates awareness of others' and one's own intent and impact, navigates discord, and collaborates in a professional and collegial manner
- follows protocols of communication and maintains confidentiality of the school when required and discretion always
- engages in respectful and constructive dialog about colleagues, students, and families, avoiding gossip
- maintains updated digital course materials through LMS
- maintains appropriate boundaries with students, families, and colleagues
- communicates proactively with families for celebrations and concerns in a timely and appropriate manner
- responds to communication in a timely and appropriate manner
- contributes to the life of the school by attending student events, school functions, and being present at community gatherings
- demonstrates professionalism by adhering to guidelines in CA's *Employee Policy Handbook* pertaining to, but not limited to, attendance, punctuality, attitude, deadlines, etc.
- effectively meets responsibilities for their role(s) in faculty meetings, professional days, committee meetings, extracurricular activities, advisory, clubs, and other duties as assigned
- maintains accurate student records (e.g., attendance, academic records, waivers, etc.) and shares with necessary parties

APPENDIX B

Aspiring for Excellence in Support of Teaching & Learning
Colorado Academy Staff

Planning & Preparation

- possesses extensive and current knowledge of the role's responsibilities and how they support CA's mission
- anticipates needs, develops efficient systems, and proactively prepares resources, materials, and/or spaces
- collaborates with colleagues to align planning with school-wide goals and initiatives
- designs processes, materials, and communications that prioritize belonging
- incorporates multiple perspectives and the range of human experiences relevant to the work at hand
- engages in continuous improvement by reflecting on work product and practices and takes action to maximize subject-matter expertise and efficiency through professional development

Work Environment & School Culture

- models and promotes Colorado Academy's mission and values of kindness, curiosity, courage, and adventure
- fosters school environment that supports a sense of culture, community, safety, and belonging for the entire school community
- maintains professional spaces (physical or virtual) that are organized, accessible, and conducive to learning and school operations
- communicates timely, clearly, and effectively with all members of the school community
- collaborates with supervisors and subordinates in a process of feedback and reflection
- contributes to a positive, collaborative workplace culture through courteous, helpful, and solution-oriented interactions

Delivery of Support Services

- carries out job responsibilities efficiently, effectively, and with attention to detail
- communicates expectations, timeliness, and procedures clearly and accurately with colleagues, students, families, and visitors, as appropriate
- facilitates discussion and problem-solving with colleagues through respectful inquiry and questioning
- implements role-specific practices and protocols to the highest standards of safety, accuracy, and professionalism
- uses technology and tools effectively support operations and communications
- provides timely, relevant, and helpful feedback to colleagues, superiors, and subordinates
- supports faculty, students, and the broader school community through timely, reliable, and high-quality support service
- demonstrates flexibility and responsiveness to evolving needs, situations, or feedback
- models curiosity, demonstrates flexibility and a growth mindset
- demonstrates subject-matter expertise and proficiency in understanding how job responsibilities interact with teaching, learning, and other roles in support of CA's mission

Professional Responsibilities

- demonstrates awareness of others' and one's own intent and impact, navigates discord, and collaborates in a professional and collegial manner
- follows protocols of communication and maintains confidentiality of the school when required and discretion always
- engages in respectful and constructive dialog about colleagues, students, and families, avoiding gossip
- maintains appropriate boundaries with students, families, and colleagues
- communicates proactively with colleagues, superiors, subordinates, and other school constituents in a timely and appropriate manner
- responds to communication in a timely and appropriate manner
- actively contributes to the life of the school by supporting events, initiatives, school functions, and community gatherings, where appropriate
- demonstrates professionalism by adhering to guidelines in CA's *Employee Policy Book* pertaining to, but not limited to, attendance, punctuality, attitude, deadlines, etc.
- effectively meets responsibilities for their role(s) in all-school meetings, professional days, committee meetings, extracurricular activities, and other duties as assigned
- maintains accurate student records (e.g., attendance, academic records, waivers, etc.) and shares with necessary parties

APPENDIX C

United Educators

Perspectives

Insights From Colleagues of UE

Guideposts for Teachers to Maintain Healthy Relationships with Students

By David Wolowitz

All schools have rules prohibiting various categories of misconduct by adults to protect students. For example, sexual conduct between an adult employee of a school and a student is universally prohibited. While rules-based training is necessary and important, it has practical limitations. It is impossible for rules to cover every situation in which a teacher interacts with a student because so much depends on context. For example, whether hugging a student is appropriate depends on many variables. Consequently, practical guideposts for preventing misconduct are often more helpful to teachers than strict rules.

Most misconduct cases involve individuals who had no history of prior serious misconduct. They often start with a teacher who interacts with a student appropriately and with good intentions. Over time, the teacher engages in small, self-serving acts which incrementally take the teacher down a "slippery slope" toward serious misconduct. If the behavior continues, the teacher eventually reaches a "point of no return" where irresistible forces take over. At that stage, rationalization sets in. The teacher justifies self-serving actions despite existing rules and takes the final steps to serious misconduct at the "bottom" of the slope. The misconduct may be sexual in nature, but other types of serious misconduct follow the same pattern, including acts of serious financial and religious misconduct.

Teachers must connect with students while ensuring that the relationship does not harm the student. They should assess their behavior and choices by looking at the potential consequences on the student's intellectual, social, and emotional development. Sometimes the safe choice may not always be clear, but if teachers use the following guideposts in their assessment, they can avoid misconduct and maintain healthy relationships with students.

About the Author

David Wolowitz is senior director and co-chair of the education law group at the McLane Law Firm in Massachusetts and New Hampshire. A substantial part of David's practice is devoted to training school administrators, faculty, and staff on safe practices to protect students in their care, how to recognize and address signs of inappropriate behavior, and how to respond to allegations of misconduct. He received his undergraduate degree from Washington University, master's degree from Harvard University, and law degree from the University of Michigan.

Roles

Teachers often function in multiple roles with students, such as classroom instructor, coach, or advisor. Teachers should avoid behavior in one role that undermines another. For example, using off-color language with students in a coaching role will undermine the teacher's role in the classroom when trying to discipline students for using similar language.

Teachers should stay in professional roles and avoid personal roles which send mixed or ambiguous signals to students. Blurring professional and personal roles causes confusion with students and contributes to the breakdown of boundaries. It is appropriate for teachers to be friendly with students, but not to act as their friend or peer. Teachers should also avoid taking on a parental role. Teachers should act as a role model, always making the student's interests primary and never meeting the teacher's needs through the student.

Safe ground:

- Maintaining professional roles with students
- Acting as a role model at all times

Risky territory:

- Acting in peer or parental roles
- Dependency that meets the teacher's needs

Boundaries

Boundaries are the physical and emotional limits individuals set in their interactions and relationships with others. Boundary awareness is a key element in promoting healthy relationships with students and avoiding misconduct. Boundary violations occur when a person in a position of responsibility crosses a boundary with someone who is vulnerable to meet his or her own needs. Boundary violations are self-serving and exploitative.

Teachers promote boundary awareness, in themselves and students, by establishing clear limits at the beginning of relationships with students and maintaining them consistently. Teachers should expect and be prepared for students to test boundaries. When they do, teachers can use the situation as an opportunity to educate students about the reasons for boundaries and reinforce them. It is always the role of the teacher to set and maintain boundaries, regardless of the behavior of the student. Being alert to healthy boundaries does not mean being aloof. Setting and respecting healthy boundaries should not interfere with forming close, supportive relationships with students.

When interacting with students, teachers should be alert for their own boundary violations. Minor violations are unavoidable. When they occur, teachers should examine their behavior so that similar conduct can be avoided going forward. Make sure your actions promote the interests of the student and not your own needs. Keep in mind that good intentions can still create a harmful impact.

Teachers with boundary awareness will learn to identify and avoid risky situations and conduct. For example, teachers need to be especially careful to avoid conduct with a student that could be mistaken for romantic or

sexual in nature. Teachers should be alert for behavior that may send signals of intimacy such as shared secrets or excessive self-disclosure. If a teacher is concerned that a student may have misinterpreted an action or statement as having a romantic or inappropriate overtone, the teacher should immediately seek guidance on how to handle it.

Safe ground:

- Establishing and reinforcing clear boundary guidelines
- Boundary crossings which are in the service of the student's interests

Risky territory:

- Blurring the boundaries between professional and personal roles
- Repeated or serious boundary violations

Power

Teachers are in a position of perceived and actual power over students and should always be alert to this inherent power imbalance. Students often idealize their teachers. They may put them on pedestals. They may even develop a crush. It is normal for a teacher to enjoy the admiration of students. However, it is the responsibility of teachers to assist students with developing into autonomous individuals.

Sadly, serious cases of misconduct occur when a teacher does not respect the dynamics of the power imbalance. What is often seen in cases of serious misconduct is a charismatic teacher who attracts vulnerable students as followers. Rather than encouraging the healthy development of autonomy in these students, this type of teacher creates an unhealthy dependency which produces a "pied piper" effect. Some of the students willingly follow the teacher wherever he or she leads. Such a relationship produces an unhealthy power dependency that meets the teacher's needs but impedes the student's development. It may be difficult for colleagues and administrators to deal with this type of teacher because they are often popular not just with students, but also with parents and alumni.

Safe ground:

- Encouraging autonomy and independence in students
- Making the student's interests primary

Risky territory:

- Actions contributing to unhealthy attachment, dependency, or disengagement
- Using power, authority, or position to meet the adult's needs

Accountability

Teachers have many opportunities to be alone with students during and after school hours. Misconduct often occurs when a student and teacher are spending significant time physically alone or communicating privately. Being alone with students is often unavoidable. When this occurs, teachers should avoid even the appearance of impropriety. For example, whenever possible, leave the door to the room open and avoid repeated unscheduled meetings alone with students. Frequent private meetings with students who are perceived as favorites can cause resentment among other students and raise suspicions with other adults.

Teachers need to be especially careful to stay in a professional role and maintain boundaries when using technology to communicate privately with students. It is easy to be more informal when texting or using social media. Teachers should, however, avoid any language which could be ambiguous or misunderstood by the student or others. Keep your electronic communications with students focused on matters about school work.

When a teacher's conduct has gone past the point of no return, it usually involves secrecy. The student will keep secrets to avoid losing his or her special relationship with the teacher. Teachers should never ask students to keep secrets in order to maintain the relationship. All interactions with students should be transparent as if they are subject to review.

Safe ground:

- Acting transparently
- Supporting the student's developmental growth and social integration

Risky territory:

- Opaque or secret conduct
- Conduct which may lead to the student's regression and social isolation.

Using the Four Guideposts to Assess Behavior and the Teacher-Student Relationship

When teachers are alert to roles, boundaries, power, and accountability in their relationships with students, self-correction is possible before serious transgressions occur. In addition, the guideposts assist teachers with identifying early warning signs in their colleagues and early intervention.

Be open to consulting with colleagues and encourage feedback.

A healthy school culture should encourage open, non-judgmental discussions among colleagues about boundaries and interactions with students. Teachers should not be afraid or reluctant to consult with others about difficult or confusing situations. When in doubt, ask for advice. For example, if a student appears to have a crush on you, do not be reluctant to ask a colleague or supervisor how to deal with it. Experienced teachers have seen or experienced most problems and can offer valuable advice. The goal is to identify potentially problematic behaviors early and to change them before they evolve into something more serious or harmful.

Another good practice is to encourage colleagues to give feedback if they have concerns about your behavior with students. It is often difficult for one colleague to give feedback to another, so it helps to remind colleagues that you are open to hearing from them. When seeking advice from colleagues, invite them to speak up about any concerns they have. Colleagues are more likely to provide important feedback if you repeatedly give them permission and tell them how much you value their input. Also, invite feedback from supervisors and others who see how you interact with students.

Raise concerns about the inappropriate conduct of others.

It is rare that serious misconduct happens in a school environment without some warning signs. To protect the interests of students and the school community, it is crucial that potentially harmful behavior is discussed when it is first observed so that it can be addressed. Neither status nor seniority excuses misbehavior putting student safety at risk. Teachers have a duty to students, their school, and their colleagues to raise and discuss concerns about behavior that may lead to misconduct impacting students. It is a good idea for teachers to consult their school's policies to see if there are specific procedures in place for reporting suspicious behavior to administration or if their state law requires them to report the conduct to government authorities.

It is difficult under any circumstances to raise behavioral concerns with a colleague. It is often even more difficult to raise concerns with a colleague's supervisor. Yet, not acting is also a disservice to the colleague. No one can change and grow without input and feedback. It is much better to deal with problematic behaviors as learning opportunities than as disciplinary matters.

If the troubling behavior seems fairly minor, consider raising it directly with a colleague. You may want to consult with someone whose advice you trust on how to do so. If the conduct continues after speaking with your colleague, consult with your supervisor about how to proceed. Do not let the conduct continue without addressing it.

If you are uncomfortable raising an issue with a colleague or feel it should be brought to the attention of an administrator, do not hesitate to go to someone in a position of responsibility. You may also want to ask a trusted colleague to assist and provide support.

Sometimes teachers assume that their colleague's supervisors already know of the problematic behavior. Never assume that someone else has already raised the concern. When concerns about student safety are involved, it is better to over-report than to under-report.

If you have alerted a supervisor and the troubling conduct continues, alert the supervisor again. If you feel the supervisor does not take the matter seriously or the conduct continues or escalates, go to a higher-level administrator. In a school that puts the interests of student safety first, there should be no adverse consequences for those who raise concerns about an adult's behavior toward students.

Remember, the teacher-student relationship should always help the student grow academically, socially, and emotionally. When teachers consider roles, boundaries, power, and accountability they are better able to set limits and maintain healthy relationships with students.

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APPENDIX D

Appendix D
Questions to Guide Teachers on Professional Boundaries

Given the responsibility that teachers have to establish a healthy climate at Colorado Academy, here are some questions teachers might ask themselves when they think about the complexity of situations that will arise when working with students. Every situation can be different. If there is ever any confusion, please consult the Head of School, the Business Manager, the Division Principal, or a mental health counselor. If a teacher answers "yes" to any of the following questions, that employee might be putting his/her position at some risk:

- **Do I text, call, or connect through social media with a student?**
- **Do I share private and personal feelings and matters with students? Follow up: If I disclose something, what was the purpose of that disclosure? Is it related to my teaching or course?**
- **Do conversations veer into the student's personal life?**
- **Do I talk about personal use of drugs or alcohol with a student?**
- **Do I talk about my relationships with significant others and partners with students?**
- **Does the conversation veer into topics of a sexual nature, from sexual innuendo and humor to flirting?**
- **Do I expect students to support me emotionally?**
- **Do I make physical contact with students? In what context?**
- **Do I spend more time with a particular student? Does a particular student tend to seek me out more than other adults?**
- **Do I treat boys and girls the same in terms of attention and time?**
- **Do I comment on a student's appearance (dress, clothing, body)?**
- **Have I tried to offer psychological advice and counseling to a student?**
- **Have I been aware of deeply personal information about a student, but have not shared it with other administrators?**

Answering yes to any of these questions should raise concerns about violating professional boundary expectations. Should a relationship with a child enter into this territory, it is critical that you consult with an administrator.