Da Vinci Schools
Board Policy

ARTIFICIAL INTELLIGENCE (AI) POLICY

Introduction

Da Vinci Schools ("Da Vinci") recognizes that artificial intelligence ("AI") can support employees, improve operations, and enhance student learning. Da Vinci also recognizes that AI may create risks to student learning, privacy, security, accuracy, equity, and academic integrity.

"Artificial intelligence" means an engineered or machine-based system that varies in its level of autonomy and that can, for explicit or implicit objectives, infer, from the input it receives, how to generate outputs that can influence physical or virtual environments. (Ed. Code, § 33328.5.)

This AI policy covers the use of any AI tool or system for school-related purposes regardless of whether such use occurs on school-owned or personal devices or on or off school premises.

Approved AI Tools and Uses:

- **Approved Tools:** Da Vinci will maintain a list of approved AI tools and permitted uses. You can contact the Director of IT to learn more about approved tools. Approval may be limited by user, purpose, data type, or feature, and users must comply with applicable restrictions and training requirements. Da Vinci staff and students must not use an AI tool unless approved by Da Vinci.

- **New Tools or Uses:** Staff who wish to use a new AI tool, or are uncertain whether a proposed use is permitted, must contact the Director of IT for further guidance. An AI tool may not be required, assigned, or used for a school-related purpose unless the tool and proposed use have been authorized by Da Vinci.

- **Responsible Use and Verification:** Individuals remain responsible for their use of AI and for work, communications, and decisions made with AI assistance. Because AI may produce inaccurate, incomplete, biased, fabricated, or misleading information, users must appropriately review and verify AI-generated content before relying on it for school-related purposes.

- **Prohibited Uses:** AI must be used consistently with Da Vinci policies and applicable law and shall not be used to create, facilitate, or distribute harmful, threatening, discriminatory, harassing, sexually explicit, or otherwise inappropriate content.

Instructional and Student Use:

- **Student Learning:** Da Vinci will carefully evaluate student use of AI based on age, educational purpose, privacy, safety, academic integrity, and the need to preserve critical thinking and foundational academic skills. AI should support, not replace, student learning. Educators may establish assignment-specific expectations regarding whether

and how students may use Da Vinci-approved AI tools, and students must follow those expectations and disclose AI assistance when required.

- **Human Decision-Making:** Da Vinci staff remain responsible for final educational determinations, and AI tools may be able to support educational tasks. However, AI tools shall not, standing alone, be used as the basis for a grade, penalty, academic integrity finding, or student discipline.

- **Parent Notice and Consent:** Da Vinci seeks to promote transparency by providing parents/guardians appropriate notice of material student-facing uses of AI. Da Vinci will obtain parent/guardian consent when required by law or Da Vinci policy, or when appropriate based on the nature of the AI tool or its proposed use, including for designated "open" AI tools.[1]

Legal Compliance:
Any use of AI must comply with applicable law and Da Vinci policies. Key requirements include:

- **Vendor Review:** AI tools that process student data or other confidential information must undergo appropriate legal and operational review before approval. Vendor agreements shall include appropriate protections concerning data use, AI model training, privacy and security, breach notification, and data retention and destruction.

- **Privacy and Confidentiality:** Student, personnel, or other confidential information shall not be entered into an AI tool unless Da Vinci has approved the tool and its use for that type of information. Student information shall be handled in accordance with FERPA, Education Code section 49073.1, the Student Online Personal Information Protection Act ("SOPIPA"), and other applicable privacy laws. Da Vinci will require appropriate privacy and data protections in agreements with AI providers, including:

    - *Ownership and Control:* Student data provided by Da Vinci shall remain under Da Vinci's ownership and control as required by applicable law and contractual requirements, including Education Code section 49073.1.

    - *Educational Use:* Da Vinci data may be accessed, used, and disclosed only for authorized educational purposes. Contractors receiving education records as school officials under FERPA may use them only for the purposes for which they were disclosed.

    - *No Advertising or Profiling:* Da Vinci student data shall not be used for targeted advertising. Data shall not be used to create student profiles except as permitted for K–12 school purposes and by applicable law, including SOPIPA.

[1] For purposes of this policy, an "open" AI tool is a publicly available AI service that is not operated within a Da Vinci-managed or closed environment and that allows users to interact directly with a generative AI system, such as through prompts, chat, voice, or content generation.

    - *Retention and Destruction:* Da Vinci student data shall be retained only as necessary for authorized purposes and returned or securely destroyed as required by applicable law, contract, or Da Vinci policy.

- **No AI Training:** Personally identifiable information from education records and other confidential information generally shall not be used to train, fine-tune, develop, evaluate, or improve a public or third-party AI model.

- **Nondiscrimination and Equitable Access:** AI shall be used in a manner that promotes equitable access and opportunity for all students and accounts for the potential for bias. AI shall not be used to unlawfully discriminate or create barriers to educational programs, services, or opportunities, including for students with disabilities.

Training and Professional Development:
Da Vinci may provide training regarding approved AI tools, privacy and security, academic integrity, output verification, accessibility, responsible use, and incident reporting. Staff and students should receive age- and role-appropriate AI literacy guidance, including how to evaluate AI-generated information and use AI responsibly.

Incident Reporting and Monitoring:
Da Vinci staff and vendors shall promptly report suspected AI-related incidents, including unauthorized AI use, suspected disclosure of student data or confidential information, or materially harmful or inappropriate AI outputs, to the CEO, Director of IT, or designee.

Da Vinci will review AI use and this policy periodically and the CEO and their designee may revise this policy based on legal developments, emerging technology, security findings, stakeholder feedback, and educational needs. The CEO, Director of IT, and/or their designees shall oversee periodic review and updates to promote safe, effective, and legally compliant use of AI education technology.

Approved and adopted by the Da Vinci Schools Board of Trustees on October 30, 2026.