

Archdiocese of Milwaukee
Parish and School Policy Manual
New and Updated Policies – Effective June 1, 2026

3410: Financial Reporting

A record of the income and expenditures of funds is to be kept according to the Parish Uniform Chart of Accounts. See the Parish Financial Management Manual for guidance.

The Parish Uniform Chart of Accounts must be used in each parish and school in the Archdiocese of Milwaukee. The level of accounting detail shall be determined by each parish or school.

The intent of those procedures is to transform financial data into financial information that can be used by parish administrators to manage the financial affairs of the parish effectively.

Parish Financial Management Manual (November 2013):

- Accurate financial records are required in every parish and school.
- One complete copy of the Confidential Financial Statement is to be sent to the Archdiocesan Parish and School Finance Consulting Office by:
 - September 15th for most parishes and schools
 - October 31st for parishes with schools participating in any of the Wisconsin Private School Choice Programs. The financial audit for these schools is due to the Wisconsin Department of Public Instruction by October 15th, and the CFS should be **finalized** after the audit.
- An annual budget must be prepared and submitted to the Archdiocese of Milwaukee Parish and School Financial Consulting Office by June 1 of the preceding fiscal year.
- A school whose Third Friday of September enrollment count varies by either twenty (20) students or 20%, whichever is less, than the budgeted enrollment count may be asked to submit a re-forecasted budget to the Archdiocese of Milwaukee Parish and School Financial Consulting Office by November 1 of the current fiscal year.
- Contributions from organizations shall be properly recorded under **account** number 3000 **Contributions**. Gifts donated for a specific purpose, or the use of a particular person or activity shall be used in accordance with the intention of the donor, but the gifts should be recorded nonetheless.
- If a contribution is not cash or a cash equivalent, e.g., athletic equipment, science equipment, carpeting, etc. it is considered a gift in-kind. Acknowledgement of the gift

should be provided to the donor, but no monetary value should be assigned to the gift or documented in the thank-you letter. Recordkeeping should be maintained by the parish or school.

- Ordinarily all funds of the parish, whether for church operation, building and ground operation, religious education program, school operation, etc., should be administered through one central checking account under the direction of the pastor and trustees of the parish. In a few instances, an exception to this policy may be made. Examples include scrip checking accounts **for scrip, required for grants or other restricted funds, or** required by the Wisconsin Department of Public Instruction.
- All activity of affiliated organizations must be included in the parish and school financial reporting.

See Policy #3570: Affiliated Organizations for additional information.

ADOPTED: 10/8/1974; REVISED: 6/1/2026

4441: Electronic Resources and Communication

Policy Statement

Electronic resources and communication systems provided by the parish or school are intended to support its educational, ministerial, and administrative mission. All personnel shall use these resources in a responsible, ethical, and lawful manner consistent with Archdiocesan policy, Catholic values, and applicable law.

Purpose

The purpose of this policy is to establish expectations for the appropriate use of electronic resources and communication systems, to safeguard parish and school operations, and to ensure compliance with legal, ethical, and safeguarding standards.

Scope

This policy applies to all clergy, employees, and volunteers who are granted access to parish or school electronic resources and communication systems. It applies to all technology owned, operated, or made available by the parish or school, including authorized use of personal devices.

General Use of Electronic Resources

Electronic resources should be used primarily for parish or school purposes. Limited personal use may be permitted provided such use does not interfere with assigned responsibilities, compromise system integrity, or violate Archdiocesan policy.

Use of electronic resources constitutes acceptance of this policy and all related Archdiocesan policies governing ethical conduct, confidentiality, harassment, and safeguarding.

No Expectation of Privacy

All electronic communications and data created, transmitted, received, or stored on parish or school systems are the property of the parish or school. Personnel shall have no expectation of privacy in such communications.

The parish or school reserves the right to monitor, access, review, and disclose electronic communications and system usage at any time, with or without notice, in accordance with applicable law.

Security and Access

Personnel shall comply with all security protocols, including the safeguarding of usernames, passwords, and access credentials. Credentials shall not be shared except with authorized supervisors or designees.

Personnel shall not access systems using another individual's credentials or install unauthorized software or encryption tools. Any suspected breach of security shall be reported immediately.

Authorized Systems and Software

This policy applies to all electronic systems, including email, internet and intranet access, telephones, mobile devices, messaging platforms, and emerging technologies.

Personnel shall not download, install, or accept terms of external applications or services on behalf of the parish or school without proper authorization.

Professional Standards and Ethical Conduct

All electronic communication shall reflect professionalism, respect, and the mission of the Church. Personnel shall recognize that their role carries inherent authority and influence, particularly in relationships with minors, and shall not use electronic communication in any manner that exploits this imbalance or compromises professional boundaries.

Communication that is offensive, harassing, discriminatory, sexually inappropriate, or otherwise inconsistent with Archdiocesan standards is prohibited.

Telephone and Voicemail

Telephone and voicemail systems shall be used for parish or school purposes and shall not be used for personal commercial activity, political advocacy, or promotion of outside organizations.

Bring Your Own Device (BYOD)

Personal devices may be used for parish or school business only with prior authorization. The parish or school reserves the right to access business-related communications or data on such devices in accordance with applicable law. Personnel are responsible for maintaining the security of their devices.

Email and Messaging Systems

Personnel shall use email and messaging systems responsibly and shall report suspicious communications. Use of these systems must comply with Archdiocesan safeguarding and communication standards.

Personal Use

Limited personal use of electronic resources may be permitted during non-working time, provided it does not interfere with responsibilities or violate this policy.

Prohibited Use

Electronic resources shall not be used for unlawful, unethical, or inappropriate purposes, including but not limited to harassment, discrimination, accessing or distributing inappropriate material, misrepresentation, or unauthorized disclosure of confidential information.

Compliance with Law

Nothing in this policy is intended to restrict rights protected under state or federal law.

Disciplinary Action

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer service.

ADOPTED: 7/15/2019, REVISED: 6/1/2026

4441.1: Social Media – *Stand Alone from previous Policy 4441*

Policy Statement

The use of social media by parish and school personnel shall reflect the mission of the Church, uphold the dignity of all persons, and support the educational and evangelizing work of the parish or school.

Purpose

Social media should be used as a tool for communication, education, and evangelization, inviting others into a deeper relationship with Jesus Christ while maintaining appropriate professional and ethical standards.

General Expectations

Personnel shall use social media responsibly and in a manner consistent with Archdiocesan policy and Catholic values. Content shared publicly or privately may reflect on the parish or school and shall be appropriate at all times.

See the Archdiocese of Milwaukee Social Media and Digital Communications Policy for additional information.

Authorization and Representation

Personnel shall not represent themselves as speaking on behalf of the parish or school without authorization. All official social media communication must be approved by the pastor, principal, or designated administrator.

Transparency and Oversight

All parish or school social media platforms shall be administered in a transparent manner. At least two adult administrators shall be assigned to each official account. Administrators are responsible for monitoring content and ensuring compliance with Archdiocesan policy.

Use of Personal Accounts

Personnel shall not use personal social media accounts for ministry-related communication with students. Separate, approved parish or school accounts shall be used for all official communication.

Interaction with Minors

Personnel shall not initiate or accept social media connections with current students or minors through personal accounts. Communication with minors shall occur only through approved parish or school platforms that allow for appropriate supervision and transparency.

Protection of Confidential Information

Personnel shall not post or share confidential, sensitive, or proprietary information related to the parish, school, students, or personnel.

Use of Images and Identifiable Information

Personnel shall not post, publish, or share images, video, or identifying information of minors except in accordance with Archdiocesan policy and with appropriate parental consent.

Minors shall not be identified by full name, tagged, or otherwise made personally identifiable. Images shall generally depict groups rather than individual minors, and posting shall not occur in real time in a manner that could reveal a student's location.

Content Standards

Personnel shall not post content that is offensive, defamatory, discriminatory, or inconsistent with Catholic teaching. Social media content shall reflect respect for all persons and fidelity to the mission of the Church.

Ownership of Accounts

All social media accounts created for parish or school purposes, including content and contacts, are the property of the parish or school.

Compliance

Personnel shall comply with all Archdiocesan social media and Safe Environment policies.

ADOPTED: 6/1/2026

4441.2: Communication with Students (Electronic Communication) - *Stand Alone from previous Policy 4441*

Policy Statement

Electronic communication with students shall be conducted in a manner that maintains appropriate professional boundaries, ensures transparency and accountability, and protects the safety and dignity of minors.

Purpose

The purpose of this policy is to establish clear standards for electronic communication between personnel and students, in order to prevent misconduct and ensure compliance with safeguarding requirements and applicable law.

Scope

This policy applies to all clergy, employees, and volunteers who communicate electronically with students in an official capacity.

Approved Communication Methods

Communication with students shall occur only through parish or school-approved systems and platforms.

Electronic communication shall include appropriate transparency measures, including the participation of at least two adults or inclusion of a parent or guardian, unless otherwise approved for a specific purpose by administration.

Transparency and Accessibility

All electronic communication with students shall be transparent and accessible to parents/guardians and appropriate parish or school personnel. Parents and guardians have the right to review communications involving their child.

Retention and Documentation

All electronic communication with students shall be retained and retrievable in accordance with Archdiocesan guidelines and shall be available for review by parents, supervisors, and appropriate authorities.

Professional Boundaries

Personnel shall maintain professional relationships with students at all times. Communication shall be limited to legitimate educational, ministerial, or supervisory purposes and shall not create personal, exclusive, or secretive relationships.

Prohibited Practices

Personnel shall not engage in private, one-to-one electronic communication with students in a manner that lacks transparency or accountability.

Personnel shall not use personal accounts, unapproved applications, or platforms that prevent appropriate supervision, documentation, or retrieval of communication.

Content Standards

All communication shall be appropriate in content and tone. Communication that is suggestive, secretive, manipulative, or that fosters emotional dependency is strictly prohibited.

Parental Rights and Participation

Parents and guardians shall be informed of communication methods used with students and shall have the right to request alternative communication methods or to opt out of specific digital communication platforms.

Compliance with Safe Environment Policies

All communication with students shall comply with Safe Environment standards and all Archdiocesan policies governing conduct with minors.

Reporting Requirements

Any suspected inappropriate communication, boundary violation, or misconduct involving electronic communication shall be reported immediately in accordance with Archdiocesan policy and applicable law.

This includes misconduct occurring through digital platforms, such as harassment, exploitation, or inappropriate sharing of content involving minors.

Disciplinary Action

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer service.

ADOPTED: 6/1/2026

5123: Student Promotion and Retention

Catholic schools must have clearly defined criteria for the promotion of a student into the next grade level. Promotion criteria from grade 3 to grade 4 must meet the requirements of 2023 Wisconsin Act 20 (Wis. Stat. §§ 118.015, 118.016, 118.33, 115.39). The school's promotion policy should identify programs and procedures the school may offer to provide additional support for students who are struggling to meet the criteria for promotion.

The school's promotion policy, program, and procedure must be clearly articulated in the student handbook and reviewed annually.

Retention of a student may be done judiciously as a final option after considering the many factors affecting retention. A student's chronological age, intellectual ability, physical size, present grade placement, peer relationships, and siblings must be factored into a decision about whether retention will help or hinder a child. When retention seems likely, parents should be contacted several times during the year.

There is no legal number of absences which, if exceeded, leads to automatic retention. Students shall not be considered for retention more than one (1) school year during the elementary school years.

The school's retention policy, program, and procedure must be clearly articulated in the student handbook. Final decisions on retention will rest with the local school authorities.

3rd-to-4th Grade Promotion Policy — Parental Choice Program Schools

Schools participating in the Milwaukee Parental Choice Program or the Wisconsin Parental Choice Program must, by July 1, 2025, have their governing body adopt a written policy establishing the criteria for promoting a pupil from grade 3 to grade 4. This policy must include at minimum a requirement that any pupil promoted to fourth grade who scored below grade-level in reading on the Wisconsin Forward Exam shall receive required intervention services and must include a good

cause exception consistent with the exception available to public school districts under Wis. Stat. § 118.33(5m)(b). Beginning September 1, 2027, schools participating in these programs may not promote a third-grade student to fourth grade unless the student satisfies the criteria in the school's adopted policy.

A student may be promoted to fourth grade despite not meeting the literacy standard under a good cause exemption when one or more of the following applies:

- The student has limited English proficiency and has been enrolled in a U.S. school for fewer than two years;
- The student has a disability whose IEP or 504 plan indicates that retention is not appropriate;
- The student has demonstrated proficiency on an alternative assessment approved by the governing body;
- The student has already been retained in grades K–3 for two or more years; or
- The principal and teacher jointly determine that retention would be harmful to the student's development.

All exemptions must be documented in writing and retained in the student's file.

ADOPTED: 6/1/1979; REVISED: 6/1/2026

5123.1: Student Acceleration

A student may be accelerated one grade level in exceptional cases **where the student's academic, intellectual, social, and emotional readiness clearly supports such a move**. Acceleration should be considered on the recommendation of the student's teachers and must have the **explicit written** approval of parents or guardians before any decision is finalized. The principal must consult with the department of Catholic School Services prior to making the final decision on an individual student's acceleration.

Utilization of all available local resources within the school and community in the assessment and educational program modifications for the student in question must be part of the process. Intellectual, developmental, social, and emotional factors must be taken into consideration before any final decisions are made.

Any arrangement for acceleration is on a trial basis for a mutually agreed-upon amount of time before becoming permanent. **The trial period must be clearly defined in advance, with specific criteria established for determining whether the acceleration will be made permanent or whether the student will return to the original grade placement.** The principal, family, and relevant teachers must review progress during and at the conclusion of the trial period.

ADOPTED: 11/12/1974; REVISED: 6/1/2026

7101: Emergency Operations Plan – *Previously 3517, Updated*

The Archdiocese of Milwaukee is committed to providing a safe and secure learning environment for every student, employee, and visitor in its schools. In fulfillment of that commitment, and in compliance with 2017 Wisconsin Act 143 and 2010 Wisconsin Act 309, every school operating under the authority of the Archdiocese of Milwaukee shall develop, maintain, practice, and annually report on a written Emergency Operations Plan (EOP).

This policy establishes minimum requirements for EOP development, content, governance, training, drills, reporting, and site assessment, and defines the roles and responsibilities of governing bodies, school administrators, faculty, and the Archdiocese of Milwaukee Department of Catholic School Services in fulfilling these requirements.

Parish catechetical programs that meet at school facilities should follow the school's EOP. Programs without a school shall develop a plan following the criteria in this policy.

Legal Framework

2010 Wisconsin Act 309 established the foundational requirement that all Wisconsin public and private schools develop comprehensive safety plans spanning four phases: Prevention/Mitigation, Preparedness, Response, and Recovery. The Act also required schools to address bullying, enhanced information sharing between schools and law enforcement, and facilitated cooperation when students are involved in illegal or disruptive behavior.

2017 Wisconsin Act 143 substantially strengthened school safety requirements by creating the Wisconsin Department of Justice Office of School Safety, establishing school safety grants, mandating annual compliance reporting, requiring on-site safety assessments in consultation with local law enforcement, and expanding mandatory reporting obligations to include threats of school violence.

Key compliance obligations under Act 143 include: annual submission to the Wisconsin Department of Justice Office of School Safety by January 1 each year; an individualized EOP for each facility or campus regularly occupied by students; governing body review and approval of the EOP at least once every three years; an annual drill for responding to a school violence event with written evaluation; an on-site safety assessment in consultation with local law enforcement conducted before each EOP creation or update; submission of school building blueprints to the Office of School Safety and local law enforcement; and mandatory reporting of school violence threats by all mandatory reporters.

Governing Body

For the purposes of Act 143 compliance and this policy, the governing body of each school is defined as follows:

- **Single Parish School:** The pastor or parish director serves as the governing body. Active participation of the School Advisory Commission is strongly encouraged.
- **Separately Incorporated School:** The School Board of Directors serves as the governing body.

The governing body is responsible for formally reviewing and approving the school's Emergency Operations Plan at least once every three years; ensuring the EOP is individualized for each facility and campus regularly occupied by students; reviewing the written evaluation of the annual school violence drill within 30 days of submission by the principal; ensuring the school completes the on-site safety assessment in consultation with local law enforcement prior to each EOP creation or

update; and ensuring all required compliance information is submitted to the Wisconsin Department of Justice Office of School Safety by January 1 each year.

EOP Development

Each school shall develop its Emergency Operations Plan with the active participation of appropriate stakeholders. The planning team should include, but is not limited to, school administrators, faculty and staff representatives, local law enforcement officers, fire department personnel, emergency medical services, mental health professionals, pupil services professionals, and the Wisconsin Department of Justice Office of School Safety as appropriate. The Department of Catholic School Services may request to review any school's Emergency Operations Plan at any time.

Each school's Emergency Operations Plan shall be structured to identify potential emergency events and to develop policies and procedures addressing the following:

- **Prevention:** capacity to avoid, deter, or stop an event from occurring.
- **Protection:** capacity to secure facilities against acts of violence and manmade / natural disasters.
- **Mitigation:** capacity to eliminate or reduce loss of life if an event occurs.
- **Response:** capacity to stabilize an emergency once the event has happened or is certain to happen.
- **Recovery:** capacity to assist schools affected by event to begin healing and to restore the learning environment.

Specific action plans should be developed for each of the following:

- **Communications protocol** before, during, and after an event.
- **Evacuation of facilities**, including the identification of multiple relocation sites.
- **Lockdown / secure facilities** to prevent entry of a threat into the facilities.
- **Shelter-in-place / secure personnel** within facilities in the event a threat is inside the facilities.
- **Account for all persons** during and after an event.
- **Reunification** of students with parents/guardians after an event.
- **Continuity of operations** during and after an event.
- **Recovery** after an event – academic, fiscal, physical, psychological and emotional.
- **Security** protocols.

Pursuant to 2017 Wisconsin Act 143, each school's EOP must include specific guidelines and procedures for school violence and attacks; threats of school violence and attacks; bomb threats; fire; weather-related emergencies; intruders; parent-student reunification; and threats to non-classroom events such as recess, athletic events, and concerts. Schools are additionally encouraged to develop protocols for abduction, contaminated food, death in the community, suicide, domestic violence, infectious disease or pandemic, power failure, and other locally identified hazards.

No Emergency Operations Plan may include any provision that requires an employee to contact a school administrator or other official before calling 9-1-1; prohibits an employee from reporting school violence or a threat directly to a law enforcement agency; or prohibits an employee from reporting a suspicious individual or activity directly to a law enforcement agency.

Plan Review, Approval, and Update Cycle

Each school's Emergency Operations Plan shall be reviewed on the following schedule:

- **Annually:** The principal reviews the EOP. If updates as needed, submit to the Wisconsin Department of Justice Office of School Safety by January 1.
- **Every Three Years:** Full EOP review and formal governing body approval; a new on-site safety assessment is conducted in consultation with local law enforcement before the update is finalized.
- **After a Critical Incident:** After-action debrief conducted; EOP updated to reflect lessons learned; governing body notified of changes.
- **After a Major Facility Change:** EOP reviewed and updated to reflect changes to building layout, access points, or occupancy; updated blueprints submitted to the Office of School Safety and local law enforcement.

On-Site Safety Assessment

Act 143 requires every school to conduct an on-site safety assessment in consultation with a local law enforcement agency before creating or updating its Emergency Operations Plan. This assessment must be conducted for each school building, site, and facility regularly occupied by students and must include playgrounds, athletic facilities or fields, and any other property students regularly occupy. The assessment must be conducted in active consultation with local law enforcement — not simply reviewed by law enforcement after the fact — must be documented with the most recent date reported in the annual Department of Justice submission, and must be completed before the EOP is created or updated.

Required Drills and Evaluations

Every school must conduct at least one drill annually in the proper response to a school violence event, consistent with its EOP. This drill may be substituted for one required fire, tornado, or other hazard drill. Within 30 days of completing the drill, the principal shall submit a brief written evaluation to the governing body addressing what went well, what did not go as planned, and recommended improvements to the EOP or future training. The governing body shall review the written evaluation, and documentation of this review must be retained and reported in the annual Department of Justice submission.

Schools are encouraged to conduct drills for additional scenarios identified in their EOP, including evacuation, shelter-in-place, and reunification. The Standard Response Protocol framework is recommended to be used as the basis for all drill design and execution.

Staff Training

Each school shall provide staff training on school safety topics on a regular basis. At minimum, training shall include orientation to the school's Emergency Operations Plan for all new employees prior to or at the start of each school year; Standard Response Protocol and Standard Reunification Method training for all faculty and staff; mandatory reporting obligations for child abuse and neglect, school violence threats under Act 143, and suicide; and behavioral threat assessment awareness and referral procedures. The date of the most recent staff safety training and the number of attendees must be reported in the annual Department of Justice submission.

All individuals who are mandatory reporters of suspected child abuse or neglect are also mandatory reporters of school violence threats under Act 143. A mandatory reporter must immediately notify a law enforcement agency if they believe in good faith, based on a threat made by an individual seen in the course of professional duties, that there is a serious and imminent threat to the health and safety of a student, school employee, or the public. Intentional violation of the reporting requirement is a misdemeanor. Good-faith reporters are immune from civil or criminal liability. See Policy 5140.12 for additional mandatory reporting requirements and procedures.

Building Blueprints and Facility Maps

Every school shall provide blueprints or equivalent facility maps for each building and facility regularly occupied by students to the Wisconsin Department of Justice Office of School Safety and to the school's local law enforcement agency. Blueprints must be current and updated whenever a significant physical change is made to a facility. Schools must either submit updated blueprints annually or certify in their annual submission that previously submitted blueprints remain current. Campus maps included in the EOP appendix should identify all exterior doors numbered sequentially, camera locations, utility shutoffs, evacuation routes, rally points, reunification areas, and hard corner locations.

Annual Compliance Reporting

By January 1 of each year, every school governing body shall submit the following to the Wisconsin Department of Justice Office of School Safety: a copy of the current school safety plan for each facility or campus; the date or dates of the required annual school violence drill conducted during the previous year; certification that the governing body reviewed the written drill evaluation; the date of the most recent staff training on school safety and the number of attendees; the most recent date on which the governing body consulted with local law enforcement to conduct the required on-site safety assessment; and copies of current facility blueprints, or certification that previously submitted blueprints remain current.

ADOPTED: 5/2/2000; REVISED: 6/1/2026

7102: Audiovisual Recording on School Buses – New Policy

2025 Wisconsin Act 160, effective April 4, 2026, specifically focuses on authorizing the use of audiovisual recording devices on school buses. It does not fundamentally change the existing statutory obligations of school districts to provide transportation for private school students, but it does establish new requirements for how private schools manage bus recording policies.

The impact of Act 160 on private schools in your requested areas is as follows:

Using Public School District Buses

Act 160 does not change the core requirement for public school districts to transport eligible resident private school students who live two miles or more from their school.

- **New Policy Requirement:** If a public district bus is equipped with audio or video recording devices, the private school's governing body must **adopt a policy** authorizing such recording if it wants those recordings to be used for school purposes.
- **Notice and Confidentiality:** The school must ensure students and parents are notified of the policy, and a sign must be clearly posted inside the bus. Recordings are strictly confidential and limited to use in school discipline, investigations, or criminal prosecutions.

Field Trips and Athletic Events

The Act explicitly covers the use of school buses for "transporting pupils to and from school and **school-sponsored activities**," which includes field trips and athletic events.

- **Contracted Buses:** If a private school contracts a bus for these events, the same recording authorization rules apply. The governing body must have a formal policy in place and provide proper notification to families to legally use recording devices on those vehicles.
- **Charges:** Existing law still requires school boards to charge private schools for the cost of providing transportation for extracurricular activities.

School-Owned Buses or Vans

Private schools that own their own buses or vans are directly impacted by the new standards for audiovisual equipment.

- **Authorization:** The private school's governing body is the authority that must adopt the recording policy for its own vehicles.
- **Vehicle Compliance:** For vehicles owned by the school (including vans), they must still meet standard inspection and insurance requirements under **Section 121.555**.
- **Capacity Limits:** Be aware that vehicles other than traditional school buses (like large vans) are generally prohibited from transporting 10 or more students.

See also: Policy 3541 — Transportation; Policy 3541.1 — Transportation of Students

ADOPTED: 6/1/2026

7103: Appropriate Communication with Students- New Policy

All communication between parish/school personnel and students shall reflect the dignity of the human person, uphold the mission of Catholic education, and maintain appropriate professional boundaries. Communication practices must comply with Safe Environment requirements, Archdiocesan policies, and applicable state law, including 2025 Wisconsin Act 89.

This policy applies to all individuals acting in an official capacity on behalf of a parish or school, including clergy, employees, and volunteers, as well as coaches, catechists, and youth ministers. It applies to all forms of communication with students, whether occurring during or outside of parish/school hours and across all platforms, including digital, verbal, and written communication.

Standards for Communication

All communication with students shall be consistent with the role of the adult as a minister, educator, or supervisor and shall maintain appropriate professional boundaries. Communication must be related to legitimate educational, ministerial, or supervisory purposes and must never create or foster a personal or exclusive relationship with a student.

Personnel shall recognize the inherent imbalance of authority in relationships with minors and conduct themselves in a manner that reflects transparency, accountability, and respect for the student and the student's family.

Approved Methods of Communication

Communication with students shall occur through parish/school-approved systems and platforms. Acceptable methods include official parish or school email systems, approved learning management systems, and other communication platforms designated by the parish/school.

When group messaging is used, it shall include appropriate transparency measures, such as the inclusion of multiple adults or access by a parent or guardian, in accordance with Archdiocesan policy. Parish/school-sponsored social media accounts may be used when administered in compliance with established guidelines.

Prohibited and Restricted Communication

Communication practices that lack transparency or accountability are not permitted. This includes one-to-one private communication with a student through text messaging, direct messaging, or social media unless a parent/guardian or another authorized adult is included.

Personnel shall not use personal social media accounts for ministry-related communication with students, nor shall they use messaging applications or platforms that do not allow for appropriate supervision, documentation, or retrieval of communication.

The use of communication methods designed to conceal, delete, or obscure interactions is strictly prohibited.

Content of Communication

All communication must be appropriate in content and tone and must relate directly to parish/school programs or activities. Communication may include educational instruction, faith formation, scheduling, or other legitimate purposes.

Communication that is personal, intimate, secretive, or unrelated to parish/school activities is not permitted. This includes, but is not limited to, flirtatious or suggestive language, discussions that create emotional dependency, or communication that attempts to isolate a student from parents, guardians, or peers.

Transparency and Record Retention

All communication with students conducted in an official capacity should be capable of being documented, retained, and reviewed. Parents and guardians have the right to access communications involving their child.

Parish/school administrators and supervisors should have access to such communication upon request to ensure compliance with this policy and other safeguarding requirements.

Professional Boundaries

Personnel shall maintain clear professional boundaries in all interactions with students.

Personnel are permitted to participate in social media for personal use on their own time and with their own accounts, unrelated to school. However, personnel are encouraged to be mindful of what is shared or posted online as staff are examples of our school's values for our school families and the community.

Personnel are prohibited from accepting or initiating social media connections (e.g., Facebook friends and Instagram follows) with current or former students under the age of 21.

Reporting Requirements

Any staff member who becomes aware of inappropriate communication between another staff member and a student is required to report it to school leadership immediately.

If a staff member receives communication from a student that would reasonably be perceived as crossing appropriate staff-student boundaries or as being otherwise inappropriate, the staff member must report the contact to the school principal.

Consistent with the state's mandatory reporting requirements, any school staff member must report suspected child abuse, which includes behavior or communications that can be reasonably construed as grooming, to child protection authorities, law enforcement, or a designated school employee who will then report it to applicable authorities.

Disciplinary Action

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer service. Disciplinary measures may include verbal or written warnings, suspension, or removal from ministry, depending on the severity of the violation and in accordance with Archdiocesan procedures.

Training Requirements

All personnel shall complete required training on an annual basis. Training shall include instruction on recognizing grooming behaviors, maintaining appropriate boundaries, and complying with reporting obligations.

Training programs may include those provided by the Wisconsin Department of Public Instruction or other approved equivalents.

Relationship to Other Policies

This policy shall be read in conjunction with existing Archdiocesan policies, including but not limited to those governing electronic communication, acceptable use of technology, and ethical standards for conduct. In the event of a conflict, the more restrictive standard shall apply in order to ensure the safety and protection of minors.

ADOPTED: 6/1/2026

7104: Parental Notification of Alleged Sexual Misconduct – New Policy

Parish and school personnel shall ensure timely, transparent, and appropriate communication with parents or guardians when there is reasonable cause to suspect sexual misconduct involving a minor. All actions taken under this policy shall comply with Wisconsin law, uphold the dignity of the human person, and reflect the Archdiocese of Milwaukee's commitment to the protection of children and youth. This policy is adopted in compliance with 2025 Wisconsin Act 57 and applies to all Archdiocesan schools and parish-based educational programs and to all clergy, employees, and volunteers acting in an official capacity, for any report or allegation involving sexual misconduct directed toward a minor, regardless of when or where the conduct is alleged to have occurred.

For the purposes of this policy, sexual misconduct includes verbal or physical conduct of a sexual nature involving a minor, as defined by Wisconsin law. Reasonable cause means a determination based on credible information, observable behavior, or statements made by a student or witness. Absolute certainty is not required to establish reasonable cause.

Requirement for Parent/Guardian Notification

Parent or guardian notification is required when a parish or school administrator determines that there is reasonable cause to suspect sexual misconduct involving a minor. The alleged conduct includes:

1. Sexual misconduct as defined in Sec. 948.098 of the Wisconsin Statutes by a school staff member, which includes any person who provides services to the school, including an employee and a person who provides services under a contract, which can also include a bus driver.
2. That an individual who has been convicted of a serious child sex offense, as defined here, has engaged in an occupation or participated in a volunteer position that requires the individual to work or interact primarily and directly with children in a manner that would be a felony under Wis. Stat. 948.13.
3. That a sex offender has intentionally captured a representation of a minor student without the written consent of the minor student's parent or guardian.

Responsibility for Notification

The responsibility for ensuring that notification occurs rests with the principal, assistant principal, or other school administrator.

Timing of Notification

Notification shall be made to the parent or guardian as soon as practicable and in strict compliance with Wisconsin law. In no case shall notification occur later than 5:00 p.m. on the same school day on which reasonable cause is determined, or by 12:00 noon on the following calendar day if the determination occurs after school hours.

Failure to meet these timelines constitutes a violation of this policy.

Method of Notification

Notification shall be made through direct personal communication with the parent or guardian, either in person or by telephone. A voicemail message may be left when direct contact cannot be made.

Written or electronic communication may be used to supplement, but not replace, the required direct notification.

Content of Notification

Notification shall include a general description of the nature of the concern, an assurance that student safety is being addressed, and a summary of the steps being taken in response, including any required reporting to civil authorities and available support resources.

Information shared shall be limited to what is appropriate and necessary and shall not include confidential personnel information or details that could compromise an ongoing investigation.

Coordination with Mandatory Reporting Requirements

This policy does not replace or diminish any mandatory reporting obligations. All personnel are required to immediately report suspected abuse or neglect to the appropriate civil authorities in accordance with state law and Archdiocesan policy.

Parent notification and reporting to civil authorities are separate obligations, and both must be fulfilled.

Internal Response Procedures

Upon receiving a report of alleged sexual misconduct, parish or school leadership shall take immediate steps to ensure the safety of the student, fulfill all mandatory reporting requirements, determine whether reasonable cause exists, and initiate parent or guardian notification.

Leadership shall also consult with the Archdiocesan Safe Environment Office and begin any necessary internal administrative response in accordance with Archdiocesan policy.

Exceptions

Parent or guardian notification shall not be made when the allegation involves the parent or guardian of the student. In such cases, parish or school personnel shall follow the direction of child protective services or law enforcement.

Documentation and Record Retention

Parishes and schools shall maintain documentation of all actions taken under this policy, including the time the report was received, the determination of reasonable cause, the time and method of notification, and the individual responsible for making the notification.

Such records shall be retained in accordance with Archdiocesan record retention policies and applicable law.

Annual Parent Notification of Rights

Each parish and school shall annually inform parents and guardians of their rights under Wisconsin law to access certain records related to employee discipline. This information may be included in parent or student handbooks or in annual registration materials.

Training Requirements

Administrators and other designated personnel shall receive annual training on the requirements of Wisconsin Act 57, including the determination of reasonable cause, notification procedures, and coordination with mandatory reporting obligations.

Relationship to Other Policies

This policy shall be read in conjunction with Archdiocesan policies regarding mandatory reporting, Code of Ethical Standards for the Archdiocese of Milwaukee, and Safe Environment requirements. In the event of a conflict, the policy providing the greatest protection for the child shall apply.

ADOPTED: 6/1/2026

7201: Early Literacy Instruction and Assessment – New Policy

All schools serving students in grades 4K through 3 shall ensure that reading and language arts instruction is grounded in science-based early reading instruction as defined by 2023 Wisconsin Act 20 and Wis. Stat. § 118.015(1c). Science-based early reading instruction is systematic and explicit and must encompass phonological awareness, phonics and word recognition, reading fluency, vocabulary, reading comprehension, and writing. Three-cueing — an instructional approach that directs pupils to use meaning-semantic, syntax-structural, and visual-graphophonic cues as equally weighted, interchangeable strategies for decoding unknown words — is prohibited in core reading curriculum and shall not be used in any classroom serving grades 4K through 3.

This policy applies to all Archdiocesan Catholic schools operating grades 4K through 3 and schools participating in the Milwaukee Parental Choice Program, Racine Parental Choice Program, or the Wisconsin Parental Choice Program. Schools not participating in any parental choice program are encouraged to implement the requirements of this policy in full as best practice. Nothing in this policy limits a school's authority to provide instruction that reflects Catholic values, integrates faith across the curriculum, or supplements statutory requirements with richer educational programming.

Instructional Requirements

All core reading and language arts instruction for students in grades 4K through 3 shall use science-based early reading instruction. Schools should audit existing materials and discontinue use of any materials that rely on three-cueing as a primary decoding strategy. Instruction must include explicit, systematic teaching of phonological awareness, the alphabetic principle, phonics and decoding, reading fluency, vocabulary, and reading comprehension strategies, with writing instruction integrated into the literacy program beginning in 4K. No teacher, instructional aide, or literacy specialist in grades 4K–3 may use three-cueing as a primary instructional approach for decoding.

Summative Assessment and 3rd-to-4th Grade Promotion

Schools participating in a parental choice program shall adopt a 3rd-to-4th grade promotion policy no later than July 1, 2025, to take effect no later than September 1, 2027. All 3rd grade pupils scoring at or above grade level in reading on the Wisconsin Forward Exam may be promoted to 4th grade.

For any pupil scoring below grade level in reading on the Wisconsin Forward Exam, the school shall provide the following services per 2023 Wisconsin Act 20:

- Intensive instructional services, progress monitoring, and supports to remediate the identified areas of reading deficiency;
- Written notification to the pupil's parent or guardian, including a description of the intensive instructional services and supports that will be provided to remediate the identified areas of reading deficiency;
- An intensive summer reading program each summer until the pupil scores at grade level in reading on a summative assessment.

Schools not participating in a parental choice program are encouraged to adopt equivalent promotion criteria and to provide comparable services to pupils scoring below grade level on the Wisconsin Forward Exam or another summative reading assessment.

Good Cause Exceptions.

Per 2023 Wisconsin Act 20, a good cause exception to the above promotion requirements and intensive services applies to any pupil who meets one of the following criteria:

- Is limited-English proficient. (A "limited-English proficient pupil" means a pupil whose ability to use the English language is limited because of the use of a non-English language in his or her family or in his or her daily, non-school surroundings, and who has difficulty, as defined by rule by the state superintendent, in performing ordinary classwork in English as a result of such limited English language proficiency.)
- Is a pupil who has an individualized education program (IEP) that indicates that taking the statewide 3rd grade standardized reading assessment is not appropriate for the pupil.
- Is a pupil who scores as proficient on reading on an alternative standardized assessment approved by DPI. (As of March 2025, the DPI-approved alternative standardized assessment is the Dynamic Learning Maps (DLM).)
- Is a pupil who has an IEP or a plan to provide accommodations or services under Section 504 of the federal Rehabilitation Act of 1973 that indicates that the pupil has received intensive intervention in reading for more than two years, if the pupil continues to demonstrate a deficiency in reading and was previously retained in kindergarten, 1st, 2nd, or 3rd grade for a total of two years.
- Is a pupil who has received intensive intervention in reading for two or more school years, continues to demonstrate a deficiency in reading, and was previously retained in kindergarten, 1st, 2nd, or 3rd grade for a total of two years.

See also: Policy 5123 — Student Promotion and Retention; Policy 6164.3 — Children with Exceptional Educational Needs

ADOPTED: 6/1/2026