

CERTIFICATION OF RESOLUTION
CYBERSECURITY POLICY

South Columbus Preparatory at German Village
(An Ohio Non-Profit Corporation)

The Governing Authority (the "Board") of **South Columbus Preparatory at German Village** (the "School" and the "Corporation"), a non-profit corporation organized under the laws of the State of Ohio, hereby resolves as follows:

WHEREAS Ohio Revised Code Sec. 9.64 requires the Board of a community school to adopt a cybersecurity program that safeguards the school's data, information technology, and information technology resources to ensure availability, confidentiality, and integrity.

WHEREAS, the Board recognizes the critical importance of protecting student data, personnel information, operational systems, and other sensitive information from cybersecurity threats, incidents, and disruptions;

WHEREAS, the School is operated by ACCEL Schools (the "Operator"), which provides centralized information technology, security, and operational services to the School and maintains a standardized, centralized cybersecurity program designed to comply with Ohio Revised Code § 9.64 and generally accepted cybersecurity best practices;

WHEREAS, the Operator's centralized cybersecurity program is intended to be implemented across the School's information systems and technology environment, with appropriate flexibility to account for school-specific operations, systems, and risk profiles;

WHEREAS, the Board desires to adopt, by reference, a cybersecurity program that is consistent with generally accepted cybersecurity frameworks and best practices, while authorizing reasonable implementation discretion necessary for effective deployment and ongoing risk management;

THEREFORE, IT IS HEREBY RESOLVED that the South Columbus Preparatory at German Village Board of Directors adopts the Cybersecurity Policy attached as Exhibit A and incorporated herein in its entirety.

IT IS FURTHER RESOLVED that the School's operator is to implement this policy.

Exhibit A

Purpose

A cybersecurity program enables schools to maintain confidentiality, security, and integrity around sensitive data and information. This policy requires the existence of a program to better serve school data protections and to inform the School and its Board on how to respond in the event of a breach.

Policy

Section 1. Adoption of Cybersecurity Program.

The Board hereby adopts a Cybersecurity Program pursuant to Ohio Revised Code § 9.64 (the “**Program**”). The Program is based on a centralized cybersecurity program maintained by the Operator and is adopted by reference as the School’s official cybersecurity program for purposes of compliance with Ohio law.

Section 2. Scope and Purpose.

The Program is intended to safeguard the School’s data, information technology, and information technology resources and to ensure their availability, confidentiality, and integrity. The Program is designed to be consistent with generally accepted cybersecurity best practices, and may include but is not limited to the following:

- (1) Identify cybersecurity functions and cybersecurity risks,
- (2) Identify the potential impact of a cybersecurity breach,
- (3) Specify the mechanism to detect threats and cybersecurity events,
- (4) Specify incident response procedures like communication, analysis, and actions to contain the incidents,
- (5) Specify procedures for the repair of infrastructure impacted by a cybersecurity incident, and maintenance of security after the incident,
- (6) Establish cybersecurity awareness and training that corresponds to the duties of each employee. Annual cybersecurity training provided by the state satisfies this requirement.

Section 3. Implementation and Administration.

The Board authorizes the School’s administration, in coordination with the Operator, to implement, administer, and maintain the Program on behalf of the School. Implementation may be tailored as reasonably necessary to account for School-specific systems, operations, staffing, and risk considerations, provided that the Program continues to satisfy the requirements of Ohio Revised Code § 9.64.

Section 4. Ransomware and Extortion Events.

In accordance with Ohio Revised Code § 9.64, the School shall not make any ransomware payment or otherwise comply with a ransom or extortion demand unless the Board first approves

such action by resolution or ordinance that expressly states why the payment or compliance is in the best interest of the School.

Following each cybersecurity incident or ransomware incident, as defined by § 9.64, the Board shall notify both of the following:

- (1) The executive director of the division of homeland security within the department of public safety, in a manner prescribed by the executive director, as soon as possible but not later than seven days after the political subdivision discovers the incident; and
- (2) The auditor of state, in a manner prescribed by the auditor of state, as soon as possible but not later than thirty days after the political subdivision discovers the incident.

Section 5. Confidentiality of Cybersecurity Records.

Records, documents, reports, and materials related to the Program, cybersecurity incidents, cybersecurity risk assessments, or the procurement and configuration of cybersecurity tools and services are declared confidential to the extent permitted by Ohio Revised Code § 9.64 and applicable provisions of Ohio Revised Code § 149.43 and shall not be treated as public records.

Section 6. Open Meetings Compliance.

The Board finds and determines that all formal actions relating to the adoption of this Resolution were taken in an open meeting of the Board, and that all deliberations resulting in such actions were conducted in compliance with Ohio Revised Code § 121.22.

Section 7. Effective Date.

This Resolution shall take effect immediately upon its adoption or at the earliest date permitted by law.

Legal References: R.C. 9.64, 149.43, 149.433

APPROVAL AND ADOPTION OF RESOLUTION

Motion to adopt the Cybersecurity Policy (without Herod with) amendment, made by Dyer
seconded by Herod.

Board Member Name	AYE	NAY	OTHER (Abstain, Not Present, etc.)
Kelly Dyer	X		
Sean Herod	X		
Scott Pullins	X		
Heather Simonis	X		
Dedra Hurst, Chair	X		

Duly adopted by a vote of the Board on this 9 day of June, 2026.

Dedra Hurst
Dedra Hurst, Chair
South Columbus Preparatory at German Village