

# OHIO AUDITOR OF STATE KEITH FABER



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**Auditor of State  
Bulletin 2025-014**

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**DATE ISSUED:** November 19, 2025

**TO:** Community Schools  
Community School Sponsors  
Independent Public Accountants

**FROM:** Keith Faber  
Ohio Auditor of State

**SUBJECT:** Community School Training on Public Records and Open Meetings  
Laws

## **Bulletin Purpose**

This Bulletin will explain the standards the Auditor of State's office will use to determine whether the officials and employees of a community school have complied with the requirement in Ohio Rev. Code § 3314.037 to take annual training on Ohio Rev. Code § 149.43 (public records law) and Ohio Rev. Code § 121.22 (open meetings law). This bulletin supersedes and replaces Technical Bulletin 2021-007.

## **Implementation Date**

The Auditor of State will begin auditing compliance with this requirement for fiscal year 2027 (i.e., periods beginning July 1, 2026 and ending on June 30, 2027). Early implementation by community schools is encouraged.

## **Background**

The Ohio Attorney General issued Opinion 2025-013 on July 30, 2025 advising that the Auditor of State (AOS) may describe the reasonable standard the AOS will use to determine whether training taken by community school officials and employees complies with Ohio Rev. Code § 3314.037.

## **Bulletin Detail**

Compliance with the annual training required in Ohio Rev. Code § 3314.037 will occur if pertinent officials attend the Certified Public Records Training offered by the Auditor of State's office, the Sunshine Law training provided by the Attorney General, or a training session that incorporates the following elements:

- The training session must be presented in a live session, either presented in-person or virtually, by attorneys licensed in Ohio who serve as legal counsel for or are employed by community schools, sponsors, or operators. Legal counsel for or employed by community schools, sponsors, or operators may teach officials and employees from more than one community school.
- Pertinent officials and employees of the community school complete the training annually.
- Each official and employee of the community school required to complete training is required to receive a certificate of attendance that can be retained and presented at the time of audit. Zoom, Teams or similar remote training are permitted provided that the presenter takes attendance and provides a certificate of attendance. The certificate of attendance must include a signed statement by the presenting attorney stating the following: "I hereby certify that the above-named individual completed the required annual public records and open meetings training." The certificate of attendance must be submitted to the community school sponsor and to AOS or the Independent Accounting firm performing the school's audit.
- To receive a certificate of attendance, attendees must attend for the duration of the training. Each training must have a sign-in sheet that includes the names of each attendee and the arrival and departure times for each attendee. The sign-in sheet must be made available at the time of audit. The presenters must have a written procedure governing what amount of time attending the training is sufficient to constitute attendance.
- The total duration of the training must be at least one hour, and at least forty-five minutes of which must be spent presenting substantive material related to the Public Records and Open Meetings Laws. Any time made open for questions from attendees must not be included in meeting the forty-five-minute minimum.
- At least twenty minutes of the presentation must cover the following topics related to the Public Records Law:
  - Statutory definitions: record, public office, public record
  - Exemptions from definition of "public record," including laws particularly relevant to community schools, such as the Family Educational Rights and Privacy Act (FERPA)
  - Presumption that exemptions are strictly construed

- Procedures for responding to requests
  - Denials and redactions
  - Hypothetical examples of requests and considerations to properly respond
- At least twenty-five minutes of the presentation must cover the following topics related to the Open Meetings Law:
  - Statutory definitions: public body, meeting, public office
  - Meetings relevant to a community school that are not subject to Ohio Rev. Code § 121.22
  - Notice requirements
  - Executive Session: process to enter and exit, topics that can be discussed in executive session, and prohibition on taking votes during executive session
  - Consequences on resolutions, rules, or formal action taken in violation of Ohio Rev. Code § 121.22
  - Hypothetical examples of application of Ohio Rev. Code § 121.22

The elements noted above are minimum requirements for training to comply with Ohio Rev. Code § 3314.037.

## Questions

If you have any questions regarding the information presented in the Bulletin, please contact the Center for Audit Excellence, Community School Specialist, at the Auditor of State's Office at [Communityschoolquestions@ohioauditor.gov](mailto:Communityschoolquestions@ohioauditor.gov).



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