



2026 FREEDOM OF EXPRESSION ANNUAL REPORT

Pursuant to 70 O.S. § 2120, as amended by SB 1725 (2026)

Indian Capital Technology Center (V-004) submits the following information to demonstrate its course of action for compliance with 70 O.S. § 2120. This report reflects statutory amendments effective July 1, 2026.

District Freedom of Expression Policy

Originally adopted January 14, 2021; revised language below reflects 2026 statutory amendments.

Indian Capital Technology Center respects and values student activism. The technology center takes pride in our students' interactions with social and political issues, viewing it as a desirable, if not essential, component of civic engagement and, therefore, adopts the following policy consistent with 70 O.S. § 2120.

Policy

The outdoor areas of any campus of the technology center are deemed public forums for the campus community, and the technology center will not create "free speech zones" or other designated areas of campus outside of which expressive activities are prohibited. The technology center may maintain and enforce reasonable time, place and manner restrictions narrowly tailored in service of a significant institutional interest when the restrictions employ clear, published, content- and viewpoint-neutral criteria and provide for ample alternative means of expression. Any such restrictions shall allow for members of the campus community to spontaneously and contemporaneously assemble and distribute literature. Nothing in this paragraph shall be interpreted as applying to student expression taking place elsewhere on campus.

Any person who wishes to engage in noncommercial expressive activity on campus shall be permitted to do so freely, as long as the person's conduct is not unlawful and does not materially and substantially disrupt the functioning of the technology center.

Nothing in this policy shall be interpreted as preventing the technology center from prohibiting, limiting or restricting expression that the First Amendment does not protect or prohibiting harassment as defined in this policy. The technology center will not sanction or discipline a student's expression as harassment unless the expression meets the definition of harassment in 70 O.S. § 2120 and this policy. Any ICTC policy applicable to students that addresses harassment should use the statutory definition applicable under 70 O.S. § 2120.

Nothing in this policy shall enable individuals to engage in conduct that intentionally, materially and substantially disrupts another person's expressive activity if that activity is occurring in a campus space reserved for that activity under the exclusive use or control of a particular group.

Nothing in this policy shall prohibit the technology center from maintaining and enforcing reasonable time, place and manner restrictions that are narrowly tailored to serve a significant institutional interest only when such restrictions employ clear, published, content- and

viewpoint-neutral criteria. Any such restrictions shall allow for members of the campus community to spontaneously and contemporaneously assemble, speak and distribute literature.

Nothing in this policy prohibits the technology center from providing resources to students affected by expressive activity that cannot lawfully be sanctioned, or from taking other nonpunitive actions designed to foster resilience or achieve pedagogical goals.

If ICTC charges a security fee to a student or student organization as part of an application for expressive activities that require a permit, the fee will not be based on the content of the expressive activity, the content of an invited guest's expression, or the anticipated reaction to the expressive activity or invited guest. Any such fee will be based on content- and viewpoint-neutral criteria, which may include the time or location of the event, and anticipated audience size. If ICTC charges such security fees, the criteria used to assess the fee will be published on the ICTC website.

The technology center will make public in the ICTC Student Handbook, on its website, and through orientation programs for students the policies, regulations, and expectations regarding free expression on campus consistent with 70 O.S. § 2120.

The technology center will develop materials, programs, and procedures to ensure that persons responsible for the discipline or education of students, including but not limited to administrators, campus police officers, and any individual who teaches students, understand the policies, regulations, and duties of the technology center regarding free expression on campus.

Reporting Requirement

By December 31 of each year, the technology center will publicly post on its website and electronically submit to the Governor, the Legislature, the Chancellor of The Oklahoma State System of Higher Education, and the Oklahoma Free Speech Committee a report detailing the course of action implemented to comply with 70 O.S. § 2120. An updated report will also be electronically submitted when ICTC changes or updates its chosen course of action.

The report provided on the website shall be:

- a. Accessible from the technology center's website home page by use of not more than three links;
- b. Searchable by keywords and phrases; and
- c. Accessible to the public without requiring registration or use of a username, password, or other user identification.

The technology center's report will include:

- a. A description of any barriers to or incidents of disruption of free expression occurring on campus, including but not limited to attempts to block or prohibit speakers and investigations into students or student organizations for their speech. The description shall include the nature of each barrier or incident, as well as what disciplinary action, if any, was taken against members of the campus community determined to be responsible for those specific barriers or incidents involving students without revealing those students' personally identifiable information; and
- b. Any other information ICTC deems valuable for the public to evaluate whether free-expression rights for all members of the campus community have been equally protected and enforced consistent with 70 O.S. § 2120.

In the event the technology center is sued for an alleged violation of First Amendment rights, a supplementary report, with a copy of the complaint or amended complaint, will be electronically submitted to the Governor and the Legislature within thirty (30) days.

Definitions

"Campus community" means students, administrators, faculty and staff at the technology center and their invited guests;

"Expressive activities" include, but are not limited to, any lawful verbal, written, audio-visual or electronic means by which individuals may communicate ideas to one another, including all forms of peaceful assembly, protests, speeches and guest speakers, distribution of literature, carrying signs and circulating petitions.

"Harassment" means only that expression that is unwelcome, so severe, pervasive and subjectively and objectively offensive that a student is effectively denied equal access to educational opportunities or benefits provided by the technology center.

"Materially and substantially disrupts" means when a person, with the intent to or with knowledge of doing so, significantly hinders another person's or group's expressive activity, prevents the communication of the message or prevents the transaction of the business of a lawful meeting, gathering or procession by:

- a. engaging in fighting, violent or other unlawful behavior, or
- b. physically blocking or using threats of violence to prevent any person from attending, listening to, viewing or otherwise participating in an expressive activity. Conduct that "materially disrupts" shall not include conduct that is protected under the First Amendment to the United States Constitution or Section 22 of Article 2 of the Oklahoma Constitution. Such protected conduct includes but is not limited to lawful protests in the outdoor areas of campus generally accessible to the members of the public, except during times when those areas have been reserved in advance for other events, or minor, brief or fleeting nonviolent disruptions of events that are isolated and short in duration;

"Outdoor areas of campus" means the generally accessible outside areas of campus where members of the campus community are commonly allowed, such as grassy areas, walkways or other similar common areas and does not include outdoor areas where access is restricted from a majority of the campus community.

"Student organization" means an officially recognized group at the technology center, or a group seeking official recognition, comprised of admitted students that receive or are seeking to receive benefits at the technology center.

Reference: 70 O.S. § 2120; 2026 Okla. Sess. Laws ch. 399 (SB 1725), effective July 1, 2026.

Professional Development for Students and Employees

Indian Capital Technology Center communicates policy and expectations to students, staff and faculty through orientation meetings and assemblies, as well as publication of policies in their respective handbooks and on the technology center website. The technology center also communicates new policy and/or updates through electronic communication. Professional development materials include a summary sheet of general information regarding 70 O.S. § 2120, the ICTC Freedom of Expression Policy, and ICTC Freedom of Expression Procedures.

ICTC also develops materials, programs, and procedures so that administrators, campus police officers, instructors, and other individuals who teach students or have responsibility for student discipline or education understand ICTC's duties regarding free expression.

Copy of Professional Development Training Information

The following professional development information is provided to the campus community through campus meetings with faculty and staff. Campus Directors are responsible for ensuring that applicable procedures and policies are communicated to students. Electronic communications may also be provided to faculty, staff, and students.

Indian Capital Technology Center Professional Development - Freedom of Expression

Part 1: Oklahoma Law

- 70 O.S. § 2120 protects expressive activities at Oklahoma public institutions of higher education, including technology center schools overseen by the State Board of Career and Technology Education. The statute was amended by SB 1725 in 2026, effective July 1, 2026.
- Generally accessible outdoor areas of ICTC campuses are public forums for the campus community. ICTC will not create “free speech zones” outside of which protected expressive activities are prohibited.
- ICTC may enforce reasonable time, place, and manner restrictions only when they are narrowly tailored to a significant institutional interest, use clear, published, content- and viewpoint-neutral criteria, and provide ample alternative means of expression.
- If ICTC charges a security fee for a permitted expressive activity, the fee must be based on published, content- and viewpoint-neutral criteria and may not be based on the content of the expression or anticipated reaction to it.
- ICTC may not sanction or discipline a student's expression as harassment unless the expression meets the statutory definition of harassment.
- ICTC must make its Freedom of Expression Policy public through student handbooks, its website, and student orientation programs.
- ICTC must provide materials, programs, and procedures so that personnel responsible for student discipline or education, including individuals who teach students, understand ICTC's free-expression obligations.
- By December 31 each year, ICTC must publicly post its annual report and electronically submit it to the Governor, Legislature, Chancellor of The Oklahoma State System of Higher Education, and Oklahoma Free Speech Committee.
- ICTC must report barriers to or incidents of disruption of free expression, including attempts to block or prohibit speakers and investigations into students or student organizations for their speech.

Part 2: ICTC Freedom of Expression Policy

Indian Capital Technology Center maintains a Freedom of Expression Policy addressing the requirements of 70 O.S. § 2120. Employees should review the current Board-approved policy and related procedures.

Part 3: Procedures

Employees should review and follow ICTC's current Freedom of Expression Procedures.

Reserving Indoor Campus Facilities

Contact the Superintendent if there is a planned expressive activity to be held in an indoor campus facility so that questions regarding safety, reasonable time, place, and manner restrictions, security needs, and setup may be addressed. Use of indoor facilities will follow applicable ICTC procedures.

Outdoor Expressive Activity

Contact the Superintendent if there is a planned expressive activity to be held in an outdoor area so that questions regarding safety, reasonable time, place, and manner restrictions, security needs, and setup may be discussed.

For outdoor campus facilities and areas, the campus community may freely engage in spontaneous expressive activities as long as the activities do not block access to campus buildings, obstruct vehicular or pedestrian traffic, substantially disrupt previously scheduled campus events or technology center operations, constitute unlawful activity, or create a clear and present threat to public safety.

ICTC personnel may not impose restrictions on members of the campus community engaging in protected expressive activities because of the content or viewpoint of their expression or the anticipated reaction to that expression. ICTC will take appropriate steps to maintain public safety while protecting lawful expressive activity.

Report of Barriers or Incidents of Disruption of Free Expression

From 2020 through 2026, Indian Capital Technology Center has not experienced any reported barriers to free expression or incidents that disrupted free expression on any of its campuses. There have been no reported attempts to block or prohibit speakers, and no students or student organizations have been investigated for their speech. Accordingly, no disciplinary action related to such barriers or incidents was taken during the reporting period.