

Duluth Public Schools

Official Response and Corrective Action Plan Submission

To: Minnesota Department of Education – Career and College Success Division

Attention: Christy Irrgang, Alternative Education Specialist

Date: April 30, 2026

Dear Ms. Irrgang,

On behalf of Duluth Public Schools, thank you for the comprehensive monitoring review of our Area Learning Center (ALC) programs and for the detailed feedback provided in your letter dated April 20, 2026. We appreciate the clarity of the findings and the opportunity to strengthen our systems to ensure full alignment with Minnesota statutes governing State-Approved Alternative Programs (SAAPs). We would also like to extend our sincere appreciation to you and Eric Billiet for meeting with our team virtually on Thursday, April 23, to answer questions and provide additional guidance regarding the findings and next steps. We value this support and the collaborative approach taken by MDE, and we look forward to continuing this partnership as we move forward.

We submit this response and accompanying Corrective Action Plan with a clear commitment to bring all ALC programming into full statutory compliance while preserving high-quality, student-centered pathways to graduation. The district acknowledges the findings across the three critical elements of Organization and Administration, Admissions (Continual Learning Plans), and Programming (Instructional Delivery and Licensure). The review identified several systemic issues, including a lack of clarity and separation between instructional models, inconsistent and noncompliant recordkeeping and ADM reporting practices, incomplete and noncompliant Continual Learning Plans, and misalignment between course offerings, staffing, and licensure requirements. We recognize that these issues reflect system-level misalignment rather than isolated concerns and therefore require a comprehensive, system-level response.

Since the time of the review, there has been a change in site leadership, and responsibility for implementation of corrective actions now rests with district leadership under the supervision of the Director of Secondary Education. This transition provides an important opportunity to re-establish clear systems of accountability, align program design with statutory expectations, and strengthen oversight of alternative programming across the district. While we are building upon work already initiated, this plan reflects a district-led and sustainable approach to compliance moving forward.

The district's corrective actions are centered on three primary areas. First, we are undertaking a structural realignment of the ALC program to ensure clear separation of instructional models, including seat-based instruction (School 611) and independent study (School 616), supported by a compliant and well-documented master schedule aligned to learning year requirements. This includes the submission of a Flexible Learning Year application for a one-year extension and implementation of a redesigned master schedule for the 2026–27 school year to ensure accurate and transparent ADM generation tied directly to instructional delivery. Second, we are implementing statutorily compliant systems for Continual Learning Plans, Independent Study programming, and student recordkeeping. New CLP processes are being developed to ensure that plans are completed annually, include all required elements, and are

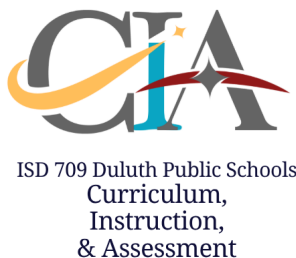
created collaboratively with students, families, and staff. Independent Study programming is being aligned to competency-based credit attainment with clearly documented teacher-student engagement, and student record systems are being redesigned to ensure alignment between enrollment, coursework, attendance, and ADM reporting. Third, we are ensuring the integrity of instruction by taking immediate steps to align all course offerings with appropriately licensed staff and to ensure that online and independent learning models meet state requirements for instructional quality and engagement. A full licensure audit is currently underway, and staffing adjustments will be completed prior to the 2026–27 school year.

We respectfully request continued guidance as we complete the reapplication process for ALC, Independent Study, and Targeted Services programming, ensure alignment with all statutory and program approval requirements, and implement sustainable systems that meet both compliance expectations and student needs. We value our partnership with the Minnesota Department of Education and are committed to working collaboratively throughout this process. We welcome the opportunity to continue dialogue with your team to review progress, receive feedback, and ensure alignment throughout implementation.

Duluth Public Schools is fully committed to ensuring that our alternative learning programs meet the highest standards of compliance, integrity, and student-centered practice. This Corrective Action Plan reflects not only our response to identified findings, but our commitment to building a stronger, more coherent system that supports all learners in achieving graduation and postsecondary success. Thank you for your partnership and continued support in this work.

Sincerely,

Jennifer Larva, Director of Secondary Education



Jennifer Larva, Ed.S.

Director of Secondary Education

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