



Minnesota Department of Education
400 NE Stinson Blvd.
Minneapolis, MN 55413

April 20, 2026

Nathan Glockle
Area Learning Center
Duluth Public School District
11 Superior Street, Ste 450
Duluth, MN 55802-2013

Greetings,

As stated in the August 25, 2025, letter to the district, the Minnesota Department of Education (MDE), through the Career and College Success Division, initiated monitoring of the district's Area Learning Center (ALC) programs to review compliance with all applicable state statutes to ensure the programs maintain approved status. This review has gathered information regarding the statutory obligations of the ALC under Minnesota Statutes 2024, sections 123A.05 to 123A.08 - State Approved Alternative Programs, 124D.68 - Graduation Incentives, and 124D.128 - Learning Year Program. Minnesota Statutes 2024, section 123A.09, confers the authority of the commissioner of education to designate and approve that state-approved alternative programs (SAAPs) are meeting the provisions under sections 123A.05 to 123A.08.

The review is in response to the district's use of a Google form that indicated students could complete a short submission to be in attendance for independent study. This letter is a response to the documents submitted with findings and recommendations. Please find attached a monitoring report and statutory references.

In January 2026, MDE expanded monitoring request based on initial review of the documents provided in the first portion of the desk review and additional information received by Duluth Public School District regarding program design for the ALC including student schedule, teacher instructional time, and comprehensive programming.

MDE would like to take this opportunity to thank you and staff members of Duluth Public School District for their cooperation and assistance during the review process. If you have any questions regarding the enclosed information, please do not hesitate to contact MDE.AlternativeLearning@state.mn.us.

Sincerely,

Christy Irrgang
Alternative Education Specialist

CC: Eric Billiet, Supervisor, Career and College Success Division
Sally Reynolds, Director, Career and COLlege Success Division
Anthony Bonds, Assistant Superintendent, Duluth Public School District

Equal Opportunity Employer

Monitoring Report

Summary of Monitoring Process

MDE staff who participated in the monitoring process include Christy Irrgang, Eric Billiet, and Sally Reynolds of Career and College Success Division. Documents necessary for monitoring, including a list of students enrolled in independent study (IS) for fiscal year (FY) 2023 and FY 2024 and teacher schedules, licenses, and file folder numbers if providing IS instruction for FY 2023 and FY 2024, were requested by September 26, 2025. The district submitted the documents in part on September 11, 2025. On November 18, 2025, MDE indicated that continual learning plans (CLP) for each student participating in IS programming for FY 2023 and FY 2024 were needed to proceed with the desk review, and that the complete documents were needed by December 5. On December 22, 2025, MDE requested clarification if the documents submitted included complete records of the requested documents. Following several clarification emails between MDE and the district, MDE indicated that the district needed to submit evidence of the full requirements of the continual learning plans. This request was fulfilled in part by January 5, 2026, and the information is missing some required elements of the CLP.

In January 2025, the district reached out to school finance for technical assistance on reporting a four-day week and instructional time that would be labeled as “Outreach” in the SIS and count for instructional time, to bring the total instructional minutes for the day to 510. As a result of that question, additional conversation occurred between MDE staff, district student accounting staff, and district program staff. The result of this conversation indicated the need for additional information from the district in an expansion of the monitoring. MDE sent a letter on January 26 requesting, from the ALC programming in FY 2024 and FY 2025, transcripts, teacher and student schedules, enrollment procedures, and course catalog. The documents were requested by February 27, 2026. The district completed the request by February 6, 2026.

Elements Reviewed

Critical Element I — Organization and Administration

Sub Element	Status	Statute / Rule / Guidance
The ALC must have received approval from MDE to operate as a SAAP. The ALC must be a site on MDE-ORG. "Site" means a separate facility. A program within a facility or within a district, such as a “school within a school” is a separate ALC site once the school board recognizes it as a site.	<input type="checkbox"/> In Compliance <input checked="" type="checkbox"/> Partial Compliance w/recommendations <input type="checkbox"/> Not in compliance w/ findings	Minn. Stat. 123A.09 Minn. Stat. 123B.04 subd. 1 Minn. Stat. 124D.128, subd. 2

Sub Element	Status	Statute / Rule / Guidance
<p>The ALC provides comprehensive educational services to enrolled secondary students throughout the entire year, including a daytime program for both high school and middle level.</p>	<input type="checkbox"/> In Compliance <input checked="" type="checkbox"/> Partial Compliance w/recommendations <input type="checkbox"/> Not in compliance w/ findings	Minn. Stat. 123A.05, subd. 1(b) Minn. Stat. 123A.06, subd. 3 Minn. Stat. 124D.128
<p>The ALC must develop and maintain a separate record system that permits identification of membership attributable to students participating in the program. The record system and identification must ensure that the program will not have the effect of increasing the total average daily membership attributable to an individual student as a result of a learning year program. The record system must include the date the student originally enrolled in a learning year program, the student's grade level, the date of each grade promotion, the average daily membership generated in each grade level, the number of credits or standards earned, and the number needed to graduate.</p>	<input type="checkbox"/> In Compliance <input type="checkbox"/> Partial Compliance w/recommendations <input checked="" type="checkbox"/> Not in compliance w/ findings	Minn. Stat. 124D.128, subd. 2

The following compliance issues were found.

- Online instruction is being implemented in a manner that does not align with statutory requirements or MDE guidance for state-approved alternative programs.
 - There is a lack of clarity on the attendance expectations and how records are kept to reflect the attendance policies and procedures.
- The ALC is operating on a four-day instructional week without receiving approval for a flexible learning year.
- The district does not follow IS requirements.
 - Enrollment records cannot blend between seat based and IS instruction in one record.
 - Students should not be required to complete a certain amount of “contact hours” to pass the class. They should be awarded credit when they pass and marked for attendance and membership per the [Independent Study Membership Hours Calculation for State-Approved Alternative Programs](#).
 - IS is blended into the school day schedule, and there is a lack of clarity on how the district is differentiating between these enrollment records and documented time and effort of teachers.
- Course catalog does not include some of the courses for which teachers are assigned to teach.
 - Student transcripts reflect IS courses that are not included in the annual IS report.

- The district’s recordkeeping system does not clearly identify student enrollment by course or instructional activity, nor does it demonstrate how average daily membership is generated and connected to coursework.
 - Teacher schedules are insufficiently documented to support instructional delivery and membership claims.
 - In some cases, students took 13 or more courses over a year in IS, and further data would be needed to analyze student schedules, MARSS record and ADM generated, and teacher instruction and attendance.

Critical Element II — Admissions

Sub Element	Status	Statute / Rule / Guidance
<p>A continual learning plan must be developed at least annually for each student with the participation of the student, parent or guardian, teachers, and other staff; each participant must sign and date the plan. The plan must specify the learning experiences that must occur during the entire fiscal year and are necessary for grade progression or, for secondary students, graduation.</p> <p>The CLP must include:</p> <ul style="list-style-type: none"> • the student's learning objectives and experiences, including courses or credits the student plans to complete each year and, for a secondary student, the graduation requirements the student must complete; • the assessment measurements used to evaluate a student's objectives; • requirements for grade level or other appropriate progression; and • for students generating more than one average daily membership in a given grade, an indication of which objectives were unmet. 	<input type="checkbox"/> In Compliance <input type="checkbox"/> Partial Compliance w/recommendations <input checked="" type="checkbox"/> Not in compliance w/ findings	Minn. Stat. 124D.128, subd. 3 Minn Stat. 126C.05, subd. 15

The following compliance issues were found.

- The district was unable to provide valid, compliant CLPs for enrolled students.
 - CLPs did not meet statutory requirements for annual development, participant involvement, signatures, or required content elements.
 - The district submitted the forms but not the completed CLPs with graduation requirements and courses. Clarification was sought on the completion of the records but the district was unable to

provide signed copies of the completed CLPs. In some cases it appears the referral form serves as the CLP.

Critical Element III – Programming

Sub Element	Status	Statute / Rule / Guidance
Districts providing online instruction in the ALC must meet the requirements of the online and digital instruction act and all SAAP statutes.	<input type="checkbox"/> In Compliance <input type="checkbox"/> Partial Compliance w/recommendations <input checked="" type="checkbox"/> Not in compliance w/ findings	Online Instruction in State-Approved Alternative Programs
Persons providing instruction are appropriately licensed with a Minnesota teaching license in the field and grade level being taught.	<input type="checkbox"/> In Compliance <input type="checkbox"/> Partial Compliance w/recommendations <input checked="" type="checkbox"/> Not in compliance w/ findings	Minn. Stat. 120A.22, subd. 10

The following compliance issues were found.

- Student instructional modality (seat-based, IS, or online instruction), schedules, and teacher contact time are not consistently or clearly documented across CLPs and teacher schedules.
- Instruction is provided in subject areas without appropriately licensed staff. Specifically, there is no licensed teacher assigned for chemistry instruction, and instruction in health, physical education, and music is provided by individuals without appropriate licensure.
- Teacher contact time was counted when students fill out a Google form, which does not meet the requirements for attendance for membership in independent study.

Next Steps

1. The district’s ALC will be reclassified as an alternative learning program starting July 1, 2026. The targeted services programs will be closed as of July 1, 2026. The independent study approval will be discontinued as of July 1, 2026.
2. The district must complete a full ALC application process, independent study application process, and targeted services application process.
3. Within thirty (30) days of receipt of this letter, the district must submit an action plan addressing compliance issues listed above. The plan should include specific steps, responsible staff, timelines for implementation, and evidence the district will provide to MDE to verify completion of tasks.

Failure to submit the required information and corrective action plan within the stated timelines may result in continued noncompliance and could place the program’s approval status at risk for fiscal year 2027.

Written Response

A response to this letter shall be directed towards MDE.AlternativeLearning@state.mn.us within 30 days of the letter's receipt indicating the action plan to complete the above items. The district is able to request a meeting with MDE within 30 days to receive any guidance on writing the action plan. We appreciate the time and effort to participate in this review process and look forward to continued partnership in supporting your program.