



**SAINT PETER SCHOOL BOARD**  
**Regular Board Meeting**  
**Wednesday, September 17, 2025**  
**SPCC-Governor's Room, 600 S. 5th St., Saint Peter, MN**  
**56082**  
**5:00 PM**

<b>I. Call Meeting to Order</b>	
<b>II. Pledge of Allegiance</b>	
<b>III. Consideration and Adoption of the Agenda</b>	
<b>IV. Consider Requests to Speak on the Agenda</b>	
<b>V. Approval of Consent Agenda Items</b>	<b>3</b>
<b>VI. Student Spotlight / Student Council Report</b>	
1. Student Spotlight - N/A	
2. Student Council Report -	
<b>VII. Action Items</b>	
1. Consider Acceptance of Gifts, Donations and Grants	61
2. Consider Certification of Preliminary 25 Pay 26 Levy	64
3. Consider Approval of Teacher Substitution Rates	69
4. Consider Approval of Community Center Lease for the Community Education Program	70
5. Consider Policies for Approval with a Single Reading	77
6. Consider Policies for Approval with a Second Reading	107
7. Consider Approval of ELA Curriculum Purchase	147
8. Consider Declaration of Obsolete and Outdated Equipment	151
<b>VIII. Information Items</b>	
1. First Reading of Revisions to the Policy Manual	153
2. Quarterly Fund Balance Tracker	170
<b>IX. Reports</b>	
1.	
1. Building Principals	
2. Superintendent of Schools	
3. Board Members -	
a. Around the Table	
4. Board Committee Updates -	
a. Education Committee	
b. Business Committee	
c. Policy Committee	
d. HR Committee	
e. Ad Hoc Legislative Committee	
f. Shared Programs Committee	

**X. Upcoming Meetings of the School Board**

HR/Negotiations Committee Meeting —

Paraprofessionals Negotiations

Monday, September 22, 2025

5:15 PM

SPMS - Conference Room

-

HR/Negotiations Committee Meeting —

Food Service Negotiations

Monday, September 29, 2025

4:30 PM

SPMS - Conference Room

-

Business Committee Meeting

Wednesday, October 8, 2025

10:00 AM

District Office

-

Policy Review Committee Meeting

Wednesday, October 8, 2025

4:00 PM

District Office

-

School Board Study Session

Wednesday, October 8, 2025

5:00 PM

SPMS - Media Center

-

Education Committee Meeting

Thursday, October 9, 2025

1:00 PM

District Office

-

Regular School Board Meeting

Wednesday, October 15, 2025

5:00 PM

SPCC - Governor's Room

**XI. Adjournment**



## ADDENDUM

### Regular Board Meeting Wednesday, September 17, 2025 SPCC-Governor's Room 5:00PM

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#### V. CONSENT AGENDA

1. Approval of the Regular Board Meeting minutes of August 20, 2025.
2. Approval of Bills and Wire Transfers (\$8,873,827.32) for August 2025.
3. Personnel
  - a. The acceptance of the resignation of Melissa Mitchell, a Health Assistant at Saint Peter High School, effective May 29, 2025.
  - b. The acceptance of the resignation of Joy Zimmerman, a Paraprofessional at Saint Peter High School, effective May 29, 2025.
  - c. The acceptance of the resignation of Allison Koepp, a Second Grade Teacher at North Elementary, effective August 11, 2025.
  - d. The acceptance of the resignation of Brock Hanson, a Paraprofessional at Saint Peter High School, effective May 29, 2025. Brock will continue to work with the district's Activities Department.
  - e. The acceptance of the resignation of Tom Wolfe, a Paraprofessional at Saint Peter High School, effective at the end of the 2024-2025 school year.
  - f. The acceptance of the resignation of Amanda Hukee, a Saints Overtime Assistant, effective July 31, 2025.
  - g. The acceptance of the resignation of Emma Kennedy, a Saints Overtime Assistant, effective at the end of the 2024-2025 school year.
  - h. The acceptance of the resignation of Kendra Stanton, a Saints Overtime Assistant, effective at the end of the 2024-2025 school year.
  - i. The acceptance of the resignation of Amy Brown, a District Office Assistant-Office Support Staff, effective September 25, 2025.
  - j. The approval of the hiring of Kris Glidden, as an Early Childhood Special Education Adaptive Phy Ed Teacher, effective at the beginning of the 2025-2026 school year.
  - k. The approval of the hiring of Carol Metzler, as a Food Service Cook/Dishwasher at North Elementary, effective August 27, 2025.

- l. The approval of the hiring of Abby Feyereisen, as a Second Grade Teacher at North Elementary, effective at the beginning of the 2025-2026 school year.
- m. The approval of the hiring of Kaden Hearne, as a Reading Support Assistant at Saint Peter High School, effective August 28, 2025.
- n. The approval of the hiring of Elle Ribbe, as a Paraprofessional at Saint Peter High School, effective August 28, 2025.
- o. The approval of the hiring of Heidi Niemeyer, as a Math Teacher at Rock Bend Learning Academy, effective at the beginning of the 2025-2026 school year.
- p. The approval of the hiring of Kevin Durham, for a .67 teaching position at Saint Peter High School, effective at the beginning of the 2025-2026 school year.
- q. The approval of the hiring of Kevin Durham, as a part-time Paraprofessional at Saint Peter High School, effective September 2, 2025.
- r. The approval of the hiring of Roxana Kennedy, as a School Readiness Paraprofessional within the Early Childhood Program, effective September 3, 2025.
- s. The approval of the hiring of Kyle Wirth, as a Special Education Teacher at the Oshawa Learning Academy, effective at the beginning of the 2025-2026 school year.
- t. The approval of the hiring of Cassidy White, as a Special Education Paraprofessional at South Elementary, effective September 10, 2025.
- u. The approval of the hiring of Micah Gilbertson, as an Afternoon Custodian at Saint Peter High School, effective upon completion of his onboarding payroll documents.
- v. The approval of the hiring of Elise St. John, as a Saints Overtime Assistant, effective for the 2025-2026 school year.
- w. The approval of the hiring of Amy Crosby Lehmann, as a Saints Overtime Assistant, effective for the 2025-2026 school year.
- x. The approval of the hiring of Addison Kuiper, as a Saints Overtime Assistant, effective for the 2025-2026 school year.
- y. The approval of the hiring of Juan Parra, as a Saints Overtime Assistant, effective for the 2025-2026 school year.

- z. The approval of the hiring of Felicity LeBlanc, as a Saints Overtime Assistant, effective for the 2025-2026 school year.
- aa. The approval of the hiring of Caitlyn Krueger, as a High School Lifeguard, effective for the 2025-2026 school year.
- bb. The approval of the hiring of Timothy Culuris, as a High School Lifeguard, effective for the 2025-2026 school year.
- cc. The approval of the re-hire of James Mealman as a Food Service Cook/Dishwasher at Saint Peter Middle School, effective September 9, 2025.
- dd. The approval of the re-hire of Nikki McClintock as a Food Service Cook/Dishwasher at Saint Peter High School, effective September 16, 2025.
- ee. The approval of the transfer of Tanner Nadeau from his Special Education Paraprofessional position at Saint Peter High School, to the same position at Rock Bend Area Learning Academy, effective at the beginning of the 2025-2026 school year.
- ff. The approval of the transfer of Angela Krueger from her Special Education Paraprofessional position at Saint Peter Middle School, to the same position at Saint Peter High School, effective at the beginning of the 2025-2026 school year.
- gg. The approval of the transfer of Jesse Anderberg to the position of Head Custodial Engineer at North Elementary, effective September 2, 2025.
- hh. The approval of the transfer to the position of Sub Cook/Dishwasher at North Elementary for Lorna Sandvik, effective at the beginning of the 2025-2026 school year.
- ii. The approval of the transfer to the position of Sub Cook/Dishwasher at North Elementary for Michele Blaschko, effective at the beginning of the 2025-2026 school year.
- jj. The approval of the reassignment of Sidney Arroyo to an Early Childhood Special Education Paraprofessional position, effective September 2, 2025.
- kk. The approval of a schedule adjustment for Sheila Truebenbach, an Early Childhood Special Education Paraprofessional, effective September 8, 2025.

- ll. The approval of an increase in assignment for Dolores Griffith, a Registered Nurse at North Elementary, effective at the beginning of the 2025-2026 school year.
- mm. The approval of the FMLA leave for Kerrey Erickson, Saints Overtime Coordinator, effective August 26, 2025 through September 10, 2025.
- nn. The approval of the following individuals resuming their roles as Aquatics Staff for the 2025-2026 school year: Vivian Hendrickson, Ashlyn Loula, Kia Maas, Adela Madsen, Paige Olinger, Madison Petersen, Sarah, Coe, Luke Gilbertson, Laura Klatt, Cameron Nelson, and Sophia Ruffing.
- oo. The approval of the following individuals resuming their roles as Saints Overtime Assistants for the 2025-2026 school year:

**Employee Summary:**

Alejandra Bonilla Hirdman, Monty Beamon, Shyla Burg, Jaya Chang, Ava Dobratz, Alex Dorrow, Madeline Hoffman, Kennedy Johnson, Mara Lien, Bella Macemon, Kaia Meyer, Bridget Mullaly, Aedan Sannes, Calleejo Sohn, Kendar Skorr, and Grace Timm.

**Substitutes**

Hailey Dettmer, Ian Gerstbauer, Shea Hildebrandt, Lizzy Haglund, Heidi Johnson, Theresa Lekander, Lilly McCargar, Taylor Sickler and Ainsley Thode.

**High School Staff**

Emma Bohmer, Miah Castillo, Piper McCargar and Cady Thoms.

- pp. The approval of the hiring of coaches and event/activity workers.



## Minutes of Regular School Board Meeting Saint Peter Public Schools

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A Regular Meeting of the School Board of Saint Peter Public Schools was held Wednesday, August 20, 2025, in the Saint Peter Community Center - Governor's Room. Board Chair Potts called the meeting to order at 5:02 PM. **Members Present:** Ken Rossow, Charlie Potts, Bill Kautt, Drew Dixon and Kate Martens. **Members Absent:** Rita Rassbach and Tracy Stuewe

**Others Present:** Jon Graff, Megan Gracia, Ytive Prafke, Jana Sykora, Darin Doherty, Jessi Buttell, Annette Engeldinger, Seth Putz and Kimberley Deming.

A motion was made by Kautt, seconded by Rossow, to Adopt the Agenda as presented. The motion carried unanimously.

The Consent Agenda items listed below were approved on a motion by Martens, seconded by Rossow. The motion carried unanimously.

1. Approval of the Regular Board Meeting minutes of July 16, 2025.
2. Approval of the Special Board Meeting minutes of August 4, 2025.
3. Approval of Bills and Wire Transfers (\$6,515,376.86) for July 2025. Approval of the
4. Personnel
  - a. The acceptance of the resignation of Kailee Byrd.
  - b. The acceptance of the resignation of Elizabeth Harris.
  - c. The acceptance of the resignation of Donna Thompson.
  - d. The acceptance of the resignation of Brittany Fyler.
  - e. The acceptance of the resignation of Cindy Nadeau.
  - f. The acceptance of the resignation of Hailie Wentworth.
  - g. The acceptance of the resignation of Sean Keating.
  - h. The acceptance of the resignation of Betsy Blume.
  - i. The acceptance of the resignation of Lauren Satrom.
  - j. The approval of the hiring of Heidi Wenner.
  - k. The approval of the hiring of Andrew Smith.

- l. The approval of the hiring of Morgan Lenhoff.
- m. The approval of the hiring of Ronald Neuenschwander.
- n. The approval of the hiring of Sarah Narvaez.
- o. The approval of the hiring of Riley Pfiffner.
- p. The approval of the transfer to the Lead Cook position for Kristen Zeiher.
- q. The approval of the transfer to the Lead Cook position for Maribel Brock.
- r. The approval of the hiring of Ana Garza.
- s. The approval of the re-hiring of Anna Leafblad.
- t. The approval of the hiring of Nicole Doyen.
- u. The approval of the hiring of Nicole Long.
- v. The approval of the hiring of Nicole Dougherty.
- w. The approval of the hiring of Danielle Dougherty.
- x. The approval of the hiring of Eric Thiese.
- y. The approval of the hiring of Jesse Mcdurmont.
- z. The approval of the hiring of Quentin Winterfeldt.
- aa. The approval of the hiring of Ben Bode.
- bb. The approval of the hiring of Hailee Guth.
- cc. The approval of the FMLA leave for Ashley Pope.
- dd. The approval of the hiring of Jacqueline Molitor.
- ee. The approval of the requested reduction in working hours for Signe Jeremiason.
- ff. The approval of the shift in positions for Aedan Sannes.
- gg. The approval of the shift in positions for Taylor Sickler.
- hh. The approval of the re-hiring of Alyza Wildes.
- ii. The approval of the hiring of coaches and event/activity workers.

## 5. Business

- a. The recommendation for approval of two lease agreements with the Leo A. Hoffmann Center. The agreements have been reviewed by the Business Committee.
  - i. \$27.00 per hour for staff hours provided to the Oshawa Learning Academy by LAHC; and
  - ii. \$500.00 per month for leased classroom space and \$500.00 per month for leased gymnasium space.

### **Action Items**

A motion was made by Martens, seconded by Kautt to accept donations from the Govenaires Performing Arts Association, St. Peter Booster Club, the Saint Peter Youth Wrestling Association, as well as a Minnesota Housing Challenge Grant. The motion carried unanimously.

On an annual basis, the School Board is presented with recommended changes to PreK-12 handbooks. Building Principals presented information about these changes. A motion was made by Dixon, seconded by Martens to approve the 2025-2026 handbooks as presented. The motion carried unanimously.

A motion was made by Martens, seconded by Dixon, to approve the adoption of changes made to the 2025-2026 Mobile Device Handbook by Technology Director Gus Sorbo. The motion carried unanimously.

Policy 806: Crisis Management requires annual board review and approval of the district's Crisis Management Plans. Superintendent Graff provided an overview of updates to the 2025-2026 plans. These plans include the adoption of three crisis/emergency response teams, the addition of language to clarify emergency response communication protocols, and the addition of The Standards Response Protocol (SRP) as the district's general crisis response strategy. A motion was made by Rossow, seconded by Dixon to approve the plans as presented. The motion carried unanimously.

Based on Federal Government and MDE guidance, the district's Adult Meal and Second Entrée Prices will remain at the current rate for 2025-2026. The district has been given the authority to update these to MDE's minimum when the information becomes available. Per Minnesota Legislature, each student in Minnesota will still receive one free breakfast and one free lunch. A motion was made by Dixon, seconded by Kautt to approve this plan. The motion carried unanimously.

A motion was made by Dixon, seconded by Martens, to approve the individual contracts for the district's Behavior and Reading Support Assistants. These positions are supported financially through MDE's ADSIS program. The motion carried unanimously.

A motion was made by Kautt, seconded by Martens, to approve a Resolution for the MSBA Legislative Platform as presented by Board Member Bill Kautt. The motion carried unanimously.

A motion was made by Martens, seconded by Dixon, to approve Policies 414, 501, 503, 516.5, 524, 602, 707, 709 and 802 with a single reading. Superintendent Graff informed the School Board of changes made to legal references, definitions and reporting procedures within these policies. The motion carried unanimously.

### **Information Items**

*First Reading of Revisions to the Policy Manual:* Revisions to Policy 806 - Crisis Management and 515 - Protection and Privacy of Pupil Records were presented by Superintendent Graff. Policy 806 has numerous changes to conform with the

modifications recommended by the MSBA and Policy 515 includes changes clarifying what can be considered directory information.

*South Elementary Breakfast/Snack Schedule:* Updates to the South Elementary breakfast and snack schedule were presented by Principal Sykora. She discussed the new routine of all students having recess prior to the start of the school day, which will then be followed by breakfast for all students when the school day begins.

*Saint Peter Facilities Use Agreement:* Community Ed Director Tami Skinner provided the School Board with information regarding the district's Facility Use Terms and Conditions Agreement that will be required to be signed when outside groups request to use district facilities.

*Building and Grounds Update:* Operations and Maintenance Supervisor Seth Putz updated the School Board on the status of the Mend the Middle Project.

## **Reports**

Updates were provided by the following Building Principals:

### Early Childhood

- Parent/Teacher Conferences took place on September 2nd and 3rd.

### South Elementary

- Parent/Teacher Conferences took place on September 2nd and 3rd.

### North Elementary

- Parent/Teacher Conferences took place on September 2nd and 3rd.

### Saint Peter Middle School

- A "Get to Know You" event took place on August 29th for all students new to District and Saint Peter Middle School.
- Parent/Teacher Conferences took place on September 2nd and 3rd.

### Saint Peter High School

- An Open House for 9-12th grade students took place on September 27th.
- The Rock Bend Program has been relocated to the Community Center

### Oshawa Learning Academy -

- There have been a lot of staffing changes within the program and Principal Sykora is excited for the new year!

Superintendent of Schools - Dr. Graff shared his excitement for the new school year and thanked all of the district's staff for the hard work that has taken place to get our buildings ready for another successful year.

Around the Table Updates - Rossow talked about the collection of school supplies for the Backpack for Kids Program. Kautt gave an update on HR/Negotiations meetings. Martens informed the group about an upcoming back to school picnic that the Native American Parent Advisory Committee is hosting.

Board Committee Updates -

- a. *Education Committee* - nothing additional noted
- b. *Business Committee* - nothing additional noted
- c. *Policy Committee* - nothing additional noted
- d. *HR Committee* - negotiations with Custodial, Paraprofessional, Office Support and Food Service Units are taking place or have been scheduled.
- e. *Ad Hoc Legislative Committee* - nothing additional noted
- f. *Shared Programs Committee* - met and discussed several topics that involve both the City and School District.

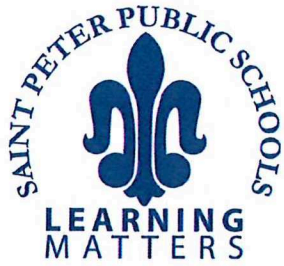
**Upcoming Meetings of the School Board**

- HR/Negotiations Committee Meeting - Thursday, August 21, 2025 at 4:30 PM at the HS
- HR/Negotiations Committee Meeting - Wednesday, August 27, 2025 at 4:30 PM at the HS
- Business Committee Meeting - Wednesday, September 10, 2025 at 10:00 AM at the DO
- Policy Review Committee Meeting - Wednesday, September 10, 2025 at 4:00 PM at the DO
- Education Committee Meeting - Thursday, September 11, 2025 at 1:00 PM at the DO
- HR/Negotiations Committee Meeting - Thursday, September 11, 2025 at 5:15 PM at the Middle School Conference Room
- HR/Negotiations Committee Meeting - Monday, September 15, 2025 at 4:30 PM at the Middle School Conference Room
- Regular School Board Meeting - Wednesday, September 17, 2025 at 5:00 PM in the SPCC - Governor's Room

**Adjournment** - A motion was made by Kautt, seconded by Martens, to adjourn the meeting at 6:35 PM. The motion carried unanimously.

Dated Approved: September 17, 2025

\_\_\_\_\_  
Kate Martens, Board Clerk



DISTRICT OFFICE  
100 Lincoln Drive, Suite 229  
Saint Peter, MN 56082-1351  
507-934-5703 (Office)  
507-934-2805 (Fax)  
www.stpeterschools.org

Date: September 5, 2025  
To: Dr. Jon Graff - Superintendent  
From: Bee Ong - Finance Accountant

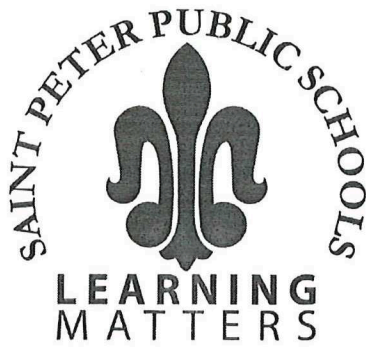
**Monthly Business Office bills & Payroll Amounts:**

August 2025 - Business Office checks	\$6,190,792.19
August 2025 - Business Office wire payments	\$1,647,500.45
August 2025 - Payroll	\$1,035,534.68
	<hr/>
	<u>\$8,873,827.32</u>

**Monthly Student Activity Amounts:**

July 2025 - South Elementary	\$0.00
July 2025 - North Elementary	\$0.00
July 2025 - Middle School	\$0.00
July 2025 - High School	\$2,223.52
	<hr/>
	<u>\$2,223.52</u>

St. Peter Public Schools	Aug-25	
<b>Outgoing Wire Payments</b>		
MSDLAF to USBank (Feb/Aug bond pymt)	8/1/2025	815,000.00
BCBS - medicare health	8/21/2025	826.00
BCBS - medicare health	8/21/2025	11,415.60
Medicare Blue RX	8/1/2025	8,140.00
Life	8/1/2025	2,996.25
LTD	8/4/2025	3,921.89
FNB BO to VISA	Aug	6,114.80
Wire of federal payroll taxes	8/4/2025	714.78
Wire of federal payroll taxes	8/15/2025	173,521.57
Wire of federal payroll taxes	8/29/2025	157,349.81
Wire of state payroll taxes	8/1/2025	27,736.20
Wire of state payroll taxes	8/5/2025	95.12
Wire of state payroll taxes	8/18/2025	29,425.72
PERA payments	8/4/2025	549.22
PERA payments	8/19/2025	21,992.29
TRA payments	8/19/2025	111,123.84
Horace Mann	8/1/2025	3,185.00
Horace Mann	8/18/2025	3,185.00
Ameriprise/NBSGroup Bill	8/1/2025	2,275.00
Ameriprise/NBSGroup Bill	8/18/2025	2,275.00
Colonial Life	8/12/2025	14,946.17
EyeMed	8/5/2025	2,266.56
HomeTown - Dental direct debits	8/4/2025	6,872.50
HomeTown - Dental direct debits	8/11/2025	6,860.48
HomeTown - Dental direct debits	8/19/2025	4,432.58
HomeTown - Dental direct debits	8/21/2025	1,914.64
HomeTown - Dental direct debits	8/25/2025	6,329.10
HomeTown - BCBS debits	8/7/2025	30,256.92
HomeTown - BCBS debits	8/14/2025	34,835.37
HomeTown - BCBS debits	8/21/2025	68,308.82
HomeTown - BCBS debits	8/28/2025	51,736.54
HomeTown - BCBS debits		
HomeTown - Healthiest You	8/4/2025	2,656.25
FNB HSA/VEBA-Medsurety/Matrix Trust	Aug	34,241.43
<b>Total Outgiong Wire Payments</b>		<b>1,647,500.45</b>



**MEMO TO:** Dr. Jon Graff  
School Board

**FROM:** Annette Engeldinger

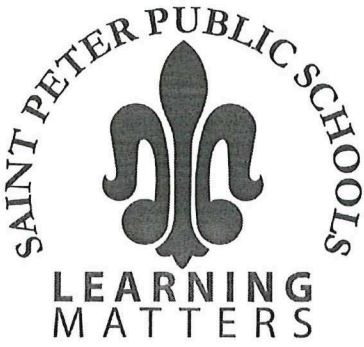
**DATE:** August 20, 2025

**SUBJECT:** Health Office resignation

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I recommend that you accept the resignation of Melissa Mitchell from her position as the high school health assistant. We thank Melissa for her dedication to our students, and we wish her the best of luck in the future! Her last day with Saint Peter Schools was May 29, 2025.

Thank you, and please let me know if you have any questions.



**MEMO TO:** Dr. Jon Graff  
School Board

**FROM:** Annette Engeldinger

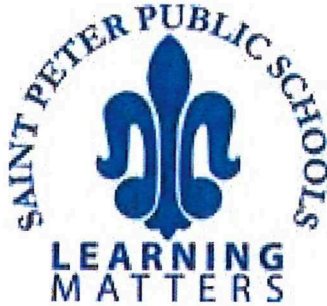
**DATE:** August 20, 2025

**SUBJECT:** Paraprofessional Resignation

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I recommend that you accept the resignation of Joy Zimmerman from her position as a paraprofessional at Saint Peter High School. We thank Joy for her dedication to our students, and we wish her the best of luck in her teaching career! Her last day with Saint Peter Schools was May 29, 2025.

Thank you, and please let me know if you have any questions.



**MEMO TO:** Dr. Jon Graff  
District 508 School Board

**FROM:** Darin Doherty, Principal  
North Elementary School

**DATE:** August 26, 2025

**SUBJECT:** Elementary Teacher Resignation

---

I recommend that you accept the resignation of **Allison Koepp** as a second-grade teacher at North Elementary School. Mrs. Koepp has served as a second-grade teacher for the past seven years and has decided to leave the field of public education.

The acceptance of her resignation letter depended on finding a highly qualified replacement, and that requirement has now been satisfied. Her resignation will retroactively take effect on August 11, 2025, the day it was originally received.

We thank Allison for her service to Saint Peter Public Schools and wish her the best of luck in her new career. Please contact me if you have any questions.

CC: grp\_hire\_certified@stpeterschools.org  
koeppallison@gmail.com



**MEMO TO:** Dr. Jon Graff  
School Board

**FROM:** Annette Engeldinger

**DATE:** August 27, 2025

**SUBJECT:** Paraprofessional Resignation

---

I recommend that you accept the resignation of Brock Hanson from his position as a paraprofessional at Saint Peter High School. We thank Brock for his dedication to our students, and we wish him the best of luck as he completes his degree in education. His last day as a para with Saint Peter Schools was May 29, 2025. Brock will continue to work with our activities programs, so he will still need access to his school accounts.

Thank you, and please let me know if you have any questions.



**MEMO TO:** Dr. Jon Graff  
School Board

**FROM:** Annette Engeldinger

**DATE:** August 27, 2025

**SUBJECT:** Paraprofessional End of Employment

---

Tom Wolfe will not be returning to his paraprofessional position with Saint Peter High School for the 2025-2026 school year.

Thank you, and please let me know if you have any questions.



**MEMO TO:** Jon Graff, Superintendent and  
School Board Members

**FROM:** Tami Skinner

**DATE:** Sept. 5, 2025

**SUBJECT:** Saints Overtime Assistant  
Resignation

---

Please accept the resignation of Amanda Hukee, a Saints Overtime Assistant. Amanda's last day of employment was July 31, 2025.

Amanda graduated from Gustavus Adolphus College and accepted a teaching position in Japan! We are grateful for all of her work with the children at Saints Overtime.

Please contact me if you have any questions regarding this resignation.



**MEMO TO:** Jon Graff, Superintendent and School Board Members

**FROM:** Tami Skinner

**DATE:** Sept. 5, 2025

**SUBJECT:** Saints Overtime Assistant Resignation

---

Please accept the resignation of Emma Kennedy, a Saints Overtime Assistant during the 2024-25 school year. Emma graduated from Gustavus Adolphus College and will not be returning to the Saints Overtime program this school year.

We are grateful for all of her work with the children at Saints Overtime and wish her the best in her future endeavours.

Please contact me if you have any questions regarding this resignation.



**MEMO TO:** Jon Graff, Superintendent and  
School Board Members

**FROM:** Tami Skinner

**DATE:** Sept. 5, 2025

**SUBJECT:** Saints Overtime Assistant  
Resignation

---

Please accept the resignation of Kendra Stanton, a Saints Overtime Assistant during the 2024-25 school year. Kendra graduated from Gustavus Adolphus College and will not be returning to the Saints Overtime program this school year.

We are grateful for all of her work with the children at Saints Overtime and wish her the best in her future endeavours.

Please contact me if you have any questions regarding this resignation.



**TO:** Superintendent Jon Graff  
School Board Members

**FROM:** Megan Gracia, Business Manager

**DATE:** September 11, 2025

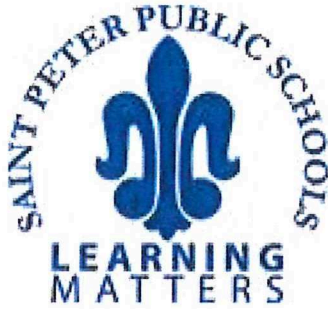
**RE:** Office Support Resignation

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I recommend approving the resignation of Amy Brown. Her last day of work will be September 25<sup>th</sup>, 2025. Most recently, Amy was working in the District Office to support operations of the DO, Maintenance, and Food Service. Unfortunately, Amy and her family will be relocating away from St. Peter. Amy was a tremendous asset to the District and a wonderful fit in the DO team; she will surely be missed! We wish her luck in the future.

Please contact me with any questions.

CC:  
Grp\_hire\_office  
Amy Brown



**MEMO TO:** Members of the School Board  
**Dr. Jon Graff**

**FROM:** Ytive Prafke

**DATE:** August 18, 2025

**SUBJECT:** ECSE DAPE Teacher

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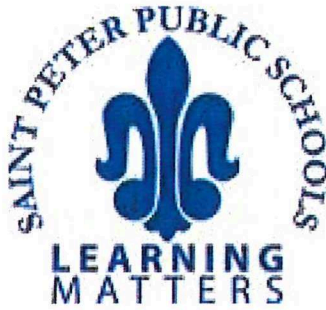
I am pleased to recommend Kris Glidden for the position of ECSE Adaptive Physical Education teacher. During the 2025-2026 school year this position will be in place for approximately 15 hours per week.

**NEW EMPLOYEE SUMMARY**

- **Kris Glidden**
  - BA +10 Step 11 (\$48.19 per hour)
  - ECSE Adaptive Physical Education teacher-Out of Field Placement License to be submitted to MDE
  - Timesheets will be submitted
  - Start Date: 2025-2026 school year
  - Replacement Position

Thank you for your consideration and your support of the Early Childhood programs.

CC: Kris Glidden  
grp\_hire\_certified



**MEMO TO:** Members of the School Board  
Dr. Graff

**FROM:** Emily Craig

**DATE:** August 26th, 2025

**SUBJECT:** Food Service Hire

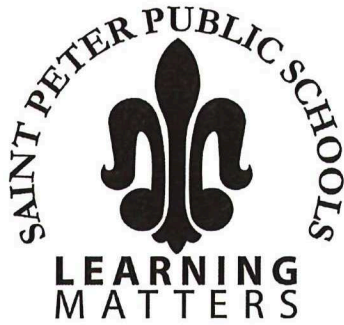
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I am pleased to recommend Carol Metzler for the position of Cook/Dishwasher in the Food Service Department at North Elementary.

**NEW EMPLOYEE SUMMARY**

- Carol Metzler
  - Cook/Dishwasher St. Peter North Elementary
  - Lane-Unassigned
  - 2025-2026 pay rate of \$17.48
  - Carol will be contracted 177 days
  - Start Date: 8/27/2025
  - Monday-Friday 10:00-1:30

Cc: Carol Metzler



Date: August 26, 2025  
To: Dr. Jon Graff, Superintendent  
Saint Peter School Board  
From: Darin Doherty, Principal  
Re: Elementary Education Teacher

---

I recommend hiring the following individual for a full-time teaching position with an assignment at North Elementary School. This is a replacement position.

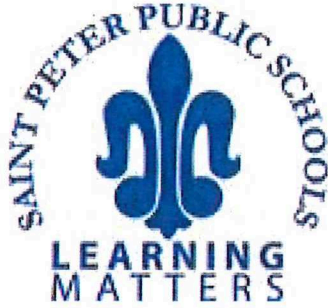
**Abby Feyereisen** – 2nd Grade Teacher, to be placed at Lane BA, Step 3 (\$52,252) of the current teacher contract.

Abby brings both teaching and unique life experiences to her new role. She recently returned to the United States after living in Denmark for three years, where she played professional volleyball, substitute taught, and coached. Prior to her time abroad, Abby taught 2nd grade in Sioux Falls, South Dakota. Her classroom experience, combined with her leadership and teamwork background, will make her a strong addition to the 2nd-grade team and to our school community.

We are excited to welcome Ms. Feyereisen to North Elementary for the 2025–2026 school year.

If you have questions, please contact me.

CC: Abby Feyereisen <Abbyfeyereisen09@gmail.com>  
grp\_hire\_certified@stpeterschools.org



**MEMO TO:** Dr. Jon Graff, Superintendent  
School Board

**FROM:** Annette Engeldinger

**DATE:** August 26, 2025

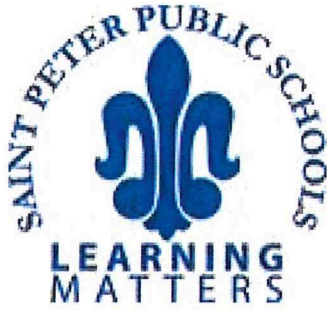
**SUBJECT:** Reading Support Assistant

---

Applications were received, and interviews took place for a reading support assistant position at Saint Peter High School. I am pleased to recommend Kaden Hearne for the position. This is a new position at the high school, made possible by the ADSIS grant.

**EMPLOYEE SUMMARY**

- **Kaden Hearne**
  - \$25.95 per hour
  - 6.75 hours per day
  - 174 days
  - Start date: August 28, 2025



**MEMO TO:** Dr. Jon Graff, Superintendent  
School Board

**FROM:** Annette Engeldinger

**DATE:** August 26, 2025

**SUBJECT:** Paraprofessional Hire

---

Applications were received, and interviews took place for a paraprofessional position at Saint Peter High School. I am pleased to recommend Elle Ribbe for the position. This is a replacement position.

**EMPLOYEE SUMMARY**

- **Elle Ribbe**
  - Step 6/ Lane A - \$18.65 per hour
  - Start date: August 28, 2025

CC: grp\_hire\_para



**TO:** Members of the School Board  
Dr. Jon Graff

**FROM:** Annette Engeldinger

**DATE:** August 27, 2025

**RE:** Personnel Recommendation  
Math Teacher

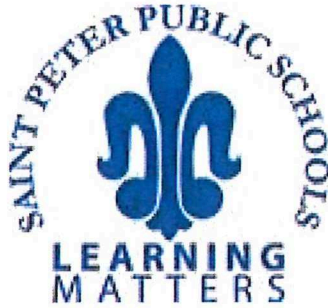
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I am happy to recommend the hiring of Ms. Heidi Niemeyer as a 1.0 math teacher at Saint Peter High School and Rockbend ALC.

**EMPLOYEE SUMMARY**

- **Heidi Niemeyer**
  - 1.0 FTE
    - .33 Rockbend ALC
    - .67 Saint Peter High School
  - Step 9/BA - \$63,861
  - Start Date: 2025-2026 school year

Please let me know if you have any questions.



MEMO TO: Members of the School Board  
Dr. Jon Graff

FROM: Annette Engeldinger

DATE: August 27, 2025

SUBJECT: Social Studies hire

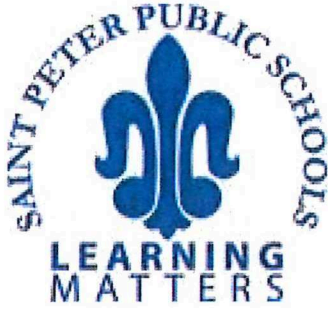
---

I am pleased to recommend Kevin Durham for a .67 teaching position at Saint Peter High School. We are happy to have him back on our team!

**EMPLOYEE SUMMARY**

- **Kevin Durham**
  - Step 2/Lane BA - \$50,536
  - .67
  - Start Date: 2025-2026 school year

CC: grp\_hire\_certified



**MEMO TO:** Dr. Jon Graff  
School Board

**FROM:** Annette Engeldinger

**DATE:** August 27, 2025

**SUBJECT:** Paraprofessional Hire

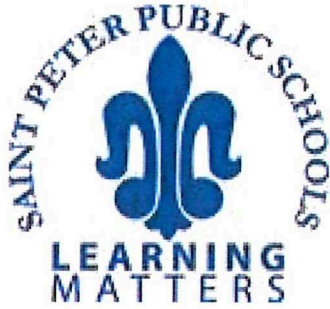
---

Applications were received, and interviews took place for a part-time paraprofessional position at Saint Peter High School. I am pleased to recommend Kevin Durham for the position.

**EMPLOYEE SUMMARY**

- **Kevin Durham**
  - Step 2B at a rate of \$17.35/hour
  - Daily from 8:15 - 9:50 and 11:25 - 1:30
  - Start date - September 2, 2025

CC: grp\_hire\_para



MEMO TO: Members of the School Board  
Dr. Jon Graff

FROM: Ytive Prafke

DATE: August 28, 2025

SUBJECT: School Readiness Classroom  
Assistant/Paraprofessional

---

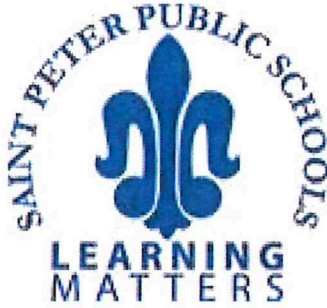
I am pleased to recommend Roxana Kennedy for the position of School Readiness Classroom Assistant/Paraprofessional.

**NEW EMPLOYEE SUMMARY**

- **Roxana Kennedy**
  - Monday-Friday mornings- 7:45-11:45 additional hours as needed
  - \$16.95 per hour
  - Roxy will complete a timesheet for her work
  - School Readiness Assistant positions are **not** included in the Paraprofessional Educator Agreement
  - Start Date: September 3, 2025

Thank you for your continued support of the School Readiness/ECFE programs.

CC: Roxana Kennedy  
grp\_hire\_para



**MEMO TO:** Members of the School Board  
Dr. Jon Graff

**FROM:** Jana Sykora

**DATE:** August 28, 2025

**SUBJECT:** Oshawa Learning Academy  
Special Education Teacher

---

Applications were received and interviews took place for a 1.0 Oshawa/Hoffmann Special Education teacher. This is a replacement position for Joey Brown (SPHS transfer). I am pleased to recommend Kyle Wirth for the position. Kyle has four years of experience teaching on a tier I license in Mankato and is currently working to obtain a tier II special education license.

**NEW EMPLOYEE SUMMARY**

- **Kyle Wirth**
  - 1.0 FTE
  - BA Step 5 (\$55,867)
  - Start Date: 25-26 School Year

CC: Kyle Wirth  
grp\_hire\_certified



**MEMO TO:** Dr. Graff, Superintendent  
School Board

**FROM:** Jana Sykora

**DATE:** September 8, 2025

**SUBJECT:** Special Education Para Hire

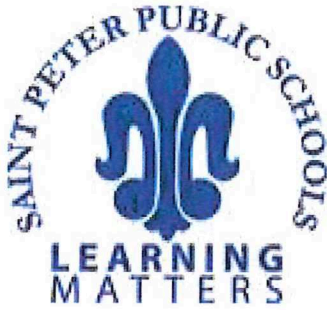
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I am very excited to recommend the hiring of Cassidy White as a special education paraprofessional at South Elementary. Cassidy is a graduate of Saint Peter High School, and we are excited to welcome her to our team.

**EMPLOYEE SUMMARY**

- **Cassidy White**
  - Start Date: September 10, 2025
  - STEP 1A: \$16.65/hour
  - 6.75 hours daily, Wednesdays and Fridays
    - 7:55 am - 3:10 pm (afternoon loop supervision)

CC: Cassidy White  
Tara Johnson (union rep)  
Stacy Abel (case facilitator)  
grp\_hire\_para



**MEMO TO:** Dr. Jon Graff, Superintendent  
School Board

**FROM:** Seth Putz

**DATE:** September 10, 2025

**SUBJECT:** Recommendation for hire

---

The Operations and Maintenance Department has an afternoon custodial opening at the Saint Peter High School.

I recommend the hiring of Micah Gilbertson to serve as the Afternoon Custodian at the Saint Peter High School. Micah has experience in the custodial field along with a strong mechanical aptitude and I believe he will be a good fit for this position and the district.

**EMPLOYMENT HIRING SUMMARY**

- **Micah Gilbertson**
  - Afternoon Custodial Engineer (Special Boiler) - Rate of pay \$19.77 per hour
  - Shift differential of \$1.14
  - 9 month probationary period ending May 10, 2026

Cc: Micah Gilbertson  
Nathan Hughes  
Annette Engeldinger  
Bob Ploog



**TO:** Dr. Jon Graff, Superintendent,  
School Board Members

**FROM:** Tami Skinner, Community & Family  
Education Director

**SUBJECT:** Saints Overtime Staff

**DATE:** August 26, 2025

---

Interviews were conducted, and I am happy to recommend hiring Elise St. John as a Saints Overtime Assistant. Her work experience makes her a great candidate.

**NEW EMPLOYEE SUMMARY**

- **Elise St. John**
- Rate of pay - \$16.65/hr.
- Part-time hours submitted on a timesheet
- 25-26 School Year
- This is a replacement position.

Thank you for your consideration.



**TO: Dr. Jon Graff, Superintendent,  
School Board Members**

**FROM: Tami Skinner, Community & Family  
Education Director**

**SUBJECT: Saints Overtime Staff**

**DATE: August 26, 2025**

---

Interviews were conducted, and I am happy to recommend hiring Amy Crosby Lehmann as a Saints Overtime Assistant. Her work experience makes her a great candidate.

**NEW EMPLOYEE SUMMARY**

- **Amy Crosby Lehmann**
- Rate of pay - \$16.65/hr.
- Part-time hours submitted on a timesheet
- 25-26 School Year
- This is a replacement position.

Thank you for your consideration.



**TO:** Dr. Jon Graff, Superintendent,  
School Board Members

**FROM:** Tami Skinner, Community & Family  
Education Director

**SUBJECT:** Saints Overtime Staff

**DATE:** September 4, 2025

---

Interviews were conducted, and I am happy to recommend hiring Addison Kuiper as a Saints Overtime Assistant. Her work experience makes her a great candidate.

**NEW EMPLOYEE SUMMARY**

- **Addison Kuiper**
- Rate of pay - \$16.65/hr.
- Part-time hours submitted on a timesheet
- 25-26 School Year
- This is a replacement position.

Thank you for your consideration.



**TO: Dr. Jon Graff, Superintendent,  
School Board Members**

**FROM: Tami Skinner, Community & Family  
Education Director**

**SUBJECT: Saints Overtime Staff**

**DATE: September 5, 2025**

---

Interviews were conducted, and I am happy to recommend hiring Juan Parra as a Saints Overtime Assistant. His work experience makes him a great candidate.

**NEW EMPLOYEE SUMMARY**

- **Juan Para**
- Rate of pay - \$16.65/hr.
- Part-time hours submitted on a timesheet
- 25-26 School Year
- This is a replacement position.

Thank you for your consideration.



**TO:** Dr. Jon Graff, Superintendent,  
School Board Members

**FROM:** Tami Skinner, Community & Family  
Education Director

**SUBJECT:** Saints Overtime Staff

**DATE:** Sept. 8, 2025

---

Interviews were conducted, and I am happy to recommend hiring Felicity LeBlanc as a Saints Overtime Assistant. Her work experience makes her a great candidate.

**NEW EMPLOYEE SUMMARY**

- **Felicity LeBlanc**
- Rate of pay - \$16.65/hr.
- Part-time hours submitted on a timesheet
- 25-26 School Year
- This is a replacement position.

Thank you for your consideration.



**TO:** Dr. Jon Graff,  
Superintendent,  
School Board Members

**FROM:** Tami Skinner, Community &  
Family Education Director

**SUBJECT:** High School Aquatics Staff

**DATE:** Sept. 2, 2025

---

Applications were received, and interviews took place for a High School Lifeguard. I am pleased to recommend hiring Caitlyn Krueger.

**NEW EMPLOYEE SUMMARY**

**Caitlyn Krueger**

- \$15.25 per hour (based on certifications and years of experience)
- Schedule based on weekly program needs
- Hours submitted on a timesheet
- 2025-26 School Year



**TO:** Dr. Jon Graff,  
Superintendent,  
School Board Members

**FROM:** Tami Skinner, Community &  
Family Education Director

**SUBJECT:** High School Aquatics Staff

**DATE:** Sept. 8, 2025

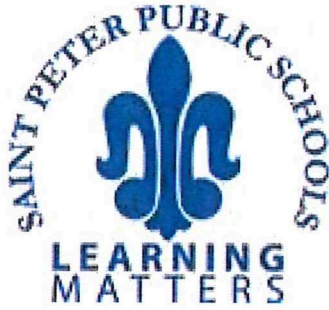
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Applications were received, and interviews took place for a High School Lifeguard. I am pleased to recommend hiring Timothy Culuris.

**NEW EMPLOYEE SUMMARY**

**Timothy Culuris**

- \$15.25 per hour (based on certifications and years of experience)
- Schedule based on weekly program needs
- Hours submitted on a timesheet
- 2025-26 School Year



**MEMO TO:** Members of the School Board  
Dr. Graff

**FROM:** Emily Craig

**DATE:** August 29, 2025

**SUBJECT:** Food Service Hire

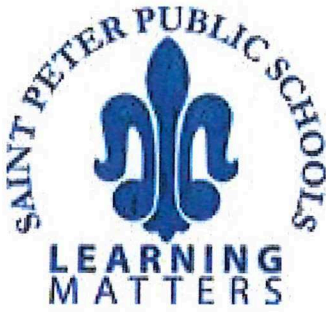
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I am pleased to recommend James Mealman for the position of Cook/Dishwasher in the Food Service Department at the middle School.

**NEW EMPLOYEE SUMMARY**

- **James Mealman**
  - Cook/Dishwasher St. Peter Middle School
  - Lane-Unassigned
  - 2025-2026 Rate-\$17.48 per hour
  - James Mealman will be filling out a timesheet for his hours 8:30-2:00
  - Start Date: 9/2/2025

Cc:James Mealman



**MEMO TO:** Members of the School Board  
Dr. Graff

**FROM:** Emily Craig

**DATE:** September 8th, 2025

**SUBJECT:** Food Service Hire

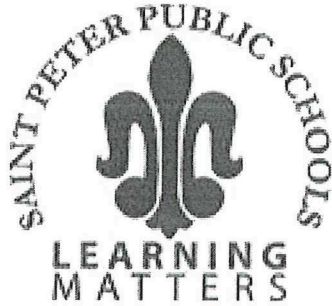
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I am pleased to recommend Nikki McClintock for the position of Cook/Dishwasher in the Food Service Department at the High School.

**NEW EMPLOYEE SUMMARY**

- Nikki McClintock
  - Cook/Dishwasher St. Peter High School
  - Lane-Unassigned
  - 2025-2026 pay rate of \$17.48
  - Nikki will work Tuesday wednesday thursday 4 hours daily
  - Start Date: 9/16/2025

Cc: Nikki McClintock



**MEMO TO:** Dr. Jon Graff  
Members of the School Board

**FROM:** Annette Engeldinger

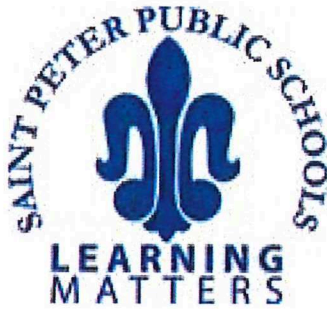
**DATE:** August 20, 2025

**SUBJECT:** Paraprofessional Transfer

---

I would like to recommend that you accept the transfer of Tanner Nadeau from a special education paraprofessional at Saint Peter High School to a special education paraprofessional at Rockbend Area Learning Center, effective for the 2025-2026 school year.

Please contact me with questions.



**MEMO TO:** Dr. Jon Graff  
Members of the School Board

**FROM:** Annette Engeldinger

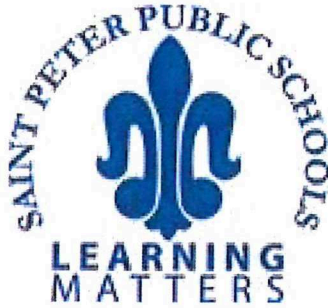
**DATE:** August 22, 2025

**SUBJECT:** Paraprofessional Transfer

---

I recommend that you accept the transfer of Angela Krueger from a special education paraprofessional at Saint Peter Middle School to a special education paraprofessional at Saint Peter High School, effective for the 2025-2026 school year.

Please contact me with questions.



**MEMO TO:** Dr. Jon Graff, Superintendent  
School Board

**FROM:** Seth Putz

**DATE:** August 27, 2025

**SUBJECT:** Recommendation for  
transfer of position

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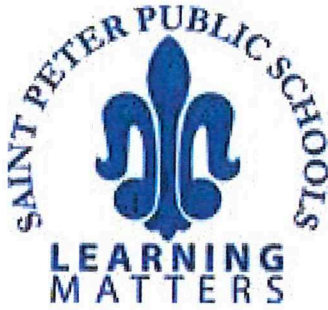
The Operations and Maintenance Department has an opening at North Elementary for the Head Custodian day shift position.

I recommend the transfer of Jesse Anderberg to serve as the Head Custodian at North Elementary. Jesse is an internal candidate and I believe he will be a good fit for this position and the district.

**EMPLOYMENT HIRING SUMMARY**

- **Jesse Anderberg**
  - Head Custodial Engineer - Rate of pay \$25.40 per hour
  - Transfer Date: September 2, 2025
  - 9 month probationary period ending April 2, 2026
  - Obtainment of a 1st class Boiler License is mandatory as soon as time line allows.

Cc: Jesse Anderberg  
Mike Keller  
Nathan Hughes  
Darin Doherty



**MEMO TO:** Members of the School Board  
Dr. Graff

**FROM:** Emily Craig

**DATE:** Sept. 12th, 2025

**SUBJECT:** Food Service Hire

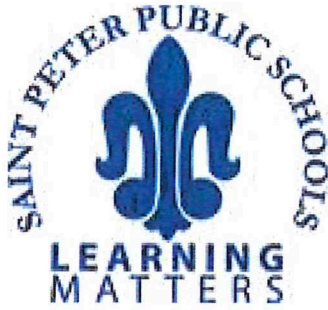
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Lorna Sandvik will move to the position of sub Cook/Dishwasher in the Food Service Department at the North Elementary.

**EMPLOYEE SUMMARY**

- Lorna Sandvik
  - Sub Cook/Dishwasher St. Peter North Elementary
  - Lane-Unassigned
  - Sub rate 2025-2026
  - Lorna Sandvik will be filling out a timesheet for her hours

Cc: Lorna Sandvik



**MEMO TO:** Members of the School Board  
Dr. Graff

**FROM:** Emily Craig

**DATE:** September 12th, 2025

**SUBJECT:** Food Service Hire

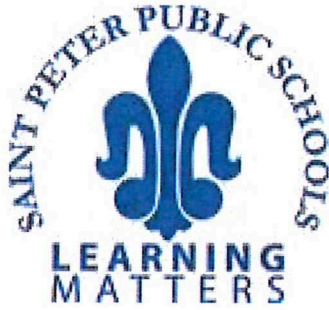
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Michele Blaschko will move from cook dishwasher to sub Cook/Dishwasher in the Food Service Department at North Elementary.

**EMPLOYEE SUMMARY**

- Michele Blaschko
  - Sub Cook/Dishwasher St. Peter North Elementary
  - Lane-Unassigned
  - Sub rate 2025-2026
  - Michele Blaschko will be filling out a timesheet for her hours

Cc: Michele Blaschko



**MEMO TO:** Members of the School Board  
Dr. Jon Graff

**FROM:** Ytve Prafke

**DATE:** September 8, 2025

**SUBJECT:** Reassignment-Paraprofessional

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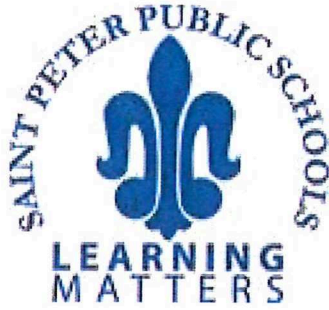
Please consider the following reassignment of Sidney Arroyo to an ECSE paraprofessional position.

**EMPLOYEE SUMMARY**

- **Sidney Arroyo**
  - Monday-Thursday- 7:45-2:15
  - \$16.65 per hour
  - Sidney will complete a timesheet for her work
  - Start Date: September 2, 2025

Thank you for your continued support of the Early Childhood programs.

CC: Sidney Arroyo  
grp\_hire\_para



**MEMO TO:** Members of the School Board  
Dr. Jon Graff

**FROM:** Ytive Prafke

**DATE:** September 8, 2025

**SUBJECT:** Schedule Change-ECSE  
Paraprofessional

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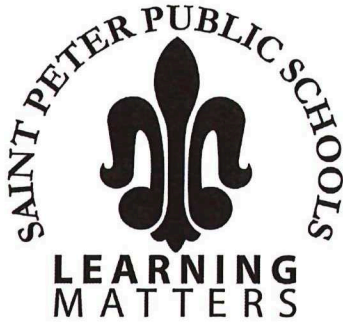
Please consider the following schedule adjustment for ECSE Paraprofessional Sheila Truebenbach.

**EMPLOYEE SUMMARY**

- **Sheila Truebenbach**
  - Monday-Thursday- 10:45-2:30
  - Schedule Adjustment Start Date: September 8, 2025

Thank you for your continued support of the Early Childhood programs.

CC: Sheila Truebenbach  
grp\_hire\_para



Date: August 22, 2025  
To: Dr. Jon Graff, Superintendent  
Saint Peter School Board  
From: Darin Doherty, Principal  
Re: FTE Increase of Registered Nurse

---

I recommend the following adjustment to staffing at North Elementary School beginning with the 2025–2026 school year:

**Dolores Griffith** – Increase in assignment from 0.5 FTE to 0.6 FTE.

This adjustment reflects programmatic needs at North Elementary and will allow for better support of student learning and services within the building. Dolores has been a dedicated member of our staff, and this additional time will enhance our capacity to meet student needs effectively.

If you have questions, please contact me.

CC: Dolores Griffith <dgriffith@stpeterschools.org>  
Group Hire Certified <grp\_hire\_certified@stpeterschools.org>



**TO: Dr. Jon Graff, Superintendent,  
School Board Members**

**FROM: Tami Skinner, Community & Family  
Education Director**

**SUBJECT: Saints Overtime Coordinator FMLA**

**DATE: August 21, 2025**

---

I recommend approving Kerrey Erickson's family medical leave of absence as the Saints Overtime Coordinator. Her leave will start on August 26, 2025, and she plans to return on September 10, 2025.

During Kerrey's absence, Saints Overtime staff members, Bridget Mullaly and Calleejo Sohn, have agreed to co-manage the program. Bridget will serve as the lead at South Elementary, and Calleejo will be the lead at North Elementary. During this period, both Bridget and Calleejo will be paid \$21.56 per hour and will submit their part-time hours on a timesheet. Upon Kerrey's return to the program, Bridget and Calleejo's regular rate of pay will resume.



**TO:** Jon Graff, Superintendent,  
School Board Members

**FROM:** Tami Skinner, Community &  
Family Education Director

**SUBJECT:** Returning Aquatics Staff

**DATE:** Sept. 2, 2022

---

The following individuals will resume their aquatics staff member roles during the 2025/26 school year. They will submit their hours on a timesheet. Their schedules will be based on weekly program needs, and their pay rates will vary based on certifications and years of experience.

**Returning Staff Members:**

Hendrickson, Vivian  
Loula, Ashlyn  
Maas, Kia  
Madsen, Adela  
Olinger, Paige  
Petersen, Madison

**Staff who will work during their college breaks:**

Coe, Sarah  
Gilbertson, Luke  
Klatt, Laura  
Nelson, Cameron  
Ruffing, Sophia



**TO:** Jon Graff, Superintendent,  
School Board Members

**FROM:** Tami Skinner, Community & Family  
Education Director

**SUBJECT:** Returning Saints Overtime Staff

**DATE:** Sept. 2, 2025

---

The following individuals will resume their roles as Saints Overtime Assistants for the 2025-26 school year. Their hours will be submitted on a timesheet.

**EMPLOYEE SUMMARY - \$16.65 per hour pay rate**

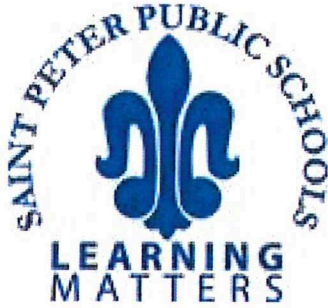
- Alejandra Bonilla Hirdman
- Monty Beamon
- Shyla Burg
- Jaya Chang
- Ava Dobratz
- Alex Dorrow
- Madeline Hoffman
- Kennedy Johnson
- Mara Lien
- Bella Macemon
- Kaia Meyer
- Bridget Mullaly (current para rate)
- Aedan Sannes
- Calleejo Sohn
- Kendra Skorr
- Grace Timm

**Substitutes**

- Hailey Dettmer (sub during college breaks)
- Ian Gerstbauer (sub during college breaks)
- Shea Hildebrandt (sub during college breaks)
- Lizzy Haglund (sub during college breaks)
- Heidi Johnson (sub)
- Theresa Lekander (current para rate)
- Lilly McCargar (sub during college breaks)
- Taylor Sickler (sub during college breaks)
- Ainsley Thode (sub during college breaks)

**HIGH SCHOOL STAFF SUMMARY - \$11.13 per hour pay rate**

- Emma Bohmer
- Miah Castillo
- Piper McCargar
- Cady Thoms



**MEMO TO:** Superintendent, Jon Graff  
Members of the School Board

**FROM:** Shea Roehrkasse, Activities  
Director

**DATE:** 8/26/2025

**SUBJECT:** B Girls Soccer Coach Hire

---

I am pleased to recommend the hiring of Samantha Madden as a Coach for our Girls Soccer Program! Sam was an All-State player for the Saints and we are excited to have her back in the program! This is an added position due to a high number of registrations. Please let me know if you have any questions.

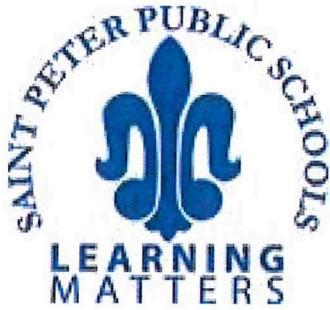
**NEW EMPLOYEE SUMMARY**

- **Samantha Madden**
  - 1.00 Co-Curricular
    - Non-Staff
    - Non licensure
    - First year of coaching
  - \$2,872

CC: grp\_hire\_misc  
Samantha Madden

Thank you,

Shea Roehrkasse  
Activities Director



**MEMO TO:** Superintendent, Jon Graff  
Members of the School Board

**FROM:** Shea Roehrkaase, Activities  
Director

**DATE:** 9/8/2025

**SUBJECT:** MS Volleyball Coach

---

I am pleased to recommend the hiring of Josie Rosenow as a Middle School Volleyball Coach. This is an added position due to an increase in numbers in registrations for both the 7th and 8th grade levels. Josie is a para at North and we are excited to have her join our program!

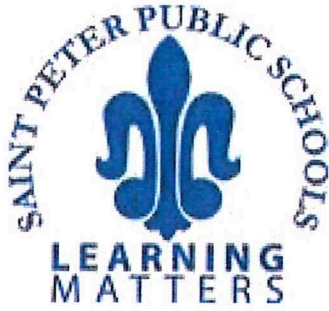
**NEW EMPLOYEE SUMMARY**

- **Josephina Rosenow**
  - 1.02 Co-Curricular
    - Staff
    - Non-Certified
  - \$1,883

CC: grp\_hire\_misc  
Josephina Rosenow

Thank you,

Shea Roehrkaase  
Activities Director



**MEMO TO:** Superintendent, Jon Graff  
Members of the School Board

**FROM:** Shea Roehrkasse

**DATE:** 8/29/2025

**SUBJECT:** Isaac Alger Event Worker

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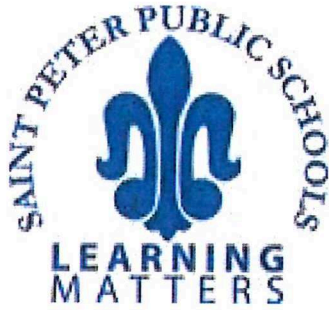
Greetings,

Please accept this recommendation to hire Isaac Alger as an event worker for St. Peter. Isaac is a 2024 graduate of SPS and will be helping us out with officiating!

Thank you,

Shea Roehrkasse  
Activities Director

Cc. grp\_hire\_misc  
Isaac Alger



**MEMO TO:** Superintendent, Jon Graff  
Members of the School Board

**FROM:** Shea Roehrkasse

**DATE:** 8/29/2025

**SUBJECT:** Abby Mattson Event Worker

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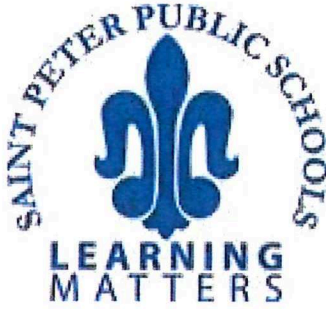
Greetings,

Please accept this recommendation to hire Abby Mattson as an event worker for St. Peter. Abby is a graduate of SPHS and will be helping us out at events this year!

Thank you,

Shea Roehrkasse  
Activities Director

Cc. grp\_hire\_misc  
Abby Mattson



**MEMO TO:** Superintendent, Jon Graff  
Members of the School Board

**FROM:** Shea Roehrkasse

**DATE:** 8/29/2025

**SUBJECT:** Alicia Madson Event Worker

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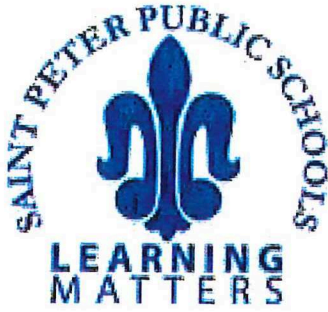
Greetings,

Please accept this recommendation to hire Alicia Madson as an event worker for St. Peter.

Thank you,

Shea Roehrkasse  
Activities Director

Cc. grp\_hire\_misc  
Alicia Madson



**MEMO TO:** Superintendent, Jon Graff  
Members of the School Board

**FROM:** Shea Roehrkasse

**DATE:** 9/11/2025

**SUBJECT:** Megan Geraets Event Worker

---

Greetings,

Please accept this recommendation to hire Megan Geraets as an event worker for St. Peter. Megan is currently a student teacher at the HS and wants to help out at some events.

Thank you,

Shea Roehrkasse  
Activities Director

Cc. grp\_hire\_misc  
Megan Geraets



## ADDENDUM

**Regular Board Meeting  
Wednesday, September 17, 2025  
SPCC-Governor's Room  
5:00PM**

---

### VII. ACTION ITEMS

<b>1. AGENDA ITEM #1</b>
--------------------------

**Subject:** Consider Acceptance of Gifts, Donations and Grants

**Action:** Requires a Motion

**Background:** The following donations have been generously offered to Saint Peter Public Schools:

1. The District received a \$500 donation from the American Red Cross to fund a scholarship for higher education costs for a graduating high school student. We are grateful for the continued support and assistance given to our SPPS students looking to further their education.
2. The District applied for a Winter Slip and Fall Grant through SFM, the worker's comp company that carries the District policy, to go towards the cost of the new plow truck that was purchased to aid in maintaining parking lots during the winter months. Our application was accepted and we were awarded \$2,000 to offset the truck's cost.

**Presentation:** Superintendent of Schools, Jon Graff

**Options/Recommendation:** I recommend your acceptance of this donation and this grant as presented.



**TO:** Superintendent Jon Graff  
School Board Members

**FROM:** Megan Gracia, Business Manager

**DATE:** September 11, 2025

**RE:** Donation – American Red Cross Scholarship

---

The District received \$500 from the American Red Cross to fund a scholarship for higher education costs for a graduating high school student. As noted on the letter from the Red Cross:

*“Education is a key factor in the work we do at the Red Cross. The Red Cross High School Scholarship program was developed to show appreciation to high schools, and their students, who display a commitment to our mission of helping to save lives. This program offers an opportunity for today’s youth to understand the importance of donating blood and preparing for emergencies by participating in blood drives hosted by their schools.”*

We are grateful for the continued support and assistance given to our SPPS students looking to further their education.

We request that you accept this donation.

CC:  
Annette Engeldinger  
Regina Sirianni  
Andy Vander Linden



**TO:** Superintendent Jon Graff  
School Board Members

**FROM:** Megan Gracia, Business Manager

**DATE:** September 11, 2025

**RE:** SFM Winter Slip and Fall Grant 2025

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SFM, the worker's comp company that carries the District policy, offered Winter Slip and Fall Grants earlier this summer. The District applied for this grant to go towards the cost of the new plow truck that was purchased to aid in maintaining parking lots during the winter months. Our application was accepted and we were awarded \$2,000 to offset the truck's cost.

We request that you accept this donation.

CC:  
Seth Putz  
Lisa Pierson  
Ytve Prafke



## ADDENDUM

**Regular Board Meeting  
Wednesday, September 17, 2025  
SPCC-Governor's Room  
5:00PM**

---

### VII. ACTION ITEMS

<b>2. AGENDA ITEM #2</b>
--------------------------

**Subject:** Consider Certification of Preliminary 2025 Pay 2026 Levy

**Action:** Requires a Motion

**Background:** On an annual basis, the School Board has the responsibility to set the levy for property taxes. Preliminary figures for the initial 2025 levy for property taxes payable in 2026 are attached. The Business Committee reviewed and discussed the levy at its meeting on September 10, 2025, and recommends the Board certifies the maximum allowable levy. The final amount will be set at the December 2025 School Board meeting.

**Presentation:** Business Manager, Megan Gracia  
Business Committee

**Options/Recommendation:** I recommend certifying the maximum allowable levy. The final decision on the levy will be made at the December Board meeting.

## Multi-Year Levy Factor Comparison

Levy Factors	21 Pay 22 Final	22 Pay 23 Final	23 Pay 24 Final	24 Pay 25 Final	25 Pay 26 Preliminary	\$ Change Levy 26 to Levy 25	% Change Levy 26 to Levy 25
*1 Market Value	1,360,794,599	1,451,516,699	1,704,680,101	1,921,099,901	2,048,644,402	127,544,501	6.64%
*2 Referendum Market Value	1,038,825,750	1,096,432,750	1,263,332,175	1,380,537,350	1,412,969,950	32,432,600	2.35%
*3 Net Tax Capacity	13,463,118	14,348,427	16,896,722	18,705,002	19,514,172	809,170	4.33%
*4 Sales ratio	0.912	0.886	0.878	0.904	0.953	0	5.42%
*5 Adj. Net Tax Capacity	14,747,600	16,186,461	19,232,155	20,687,751	20,464,300	(223,451)	-1.08%
6 Total levy	7,115,818	7,143,023	7,652,181	9,902,416	10,019,622	117,206	1.18%
\$ Increase over PY		27,205	509,158	2,250,235	117,206		
% Increase over PY		0.38%	7.13%	29.41%	1.184%		

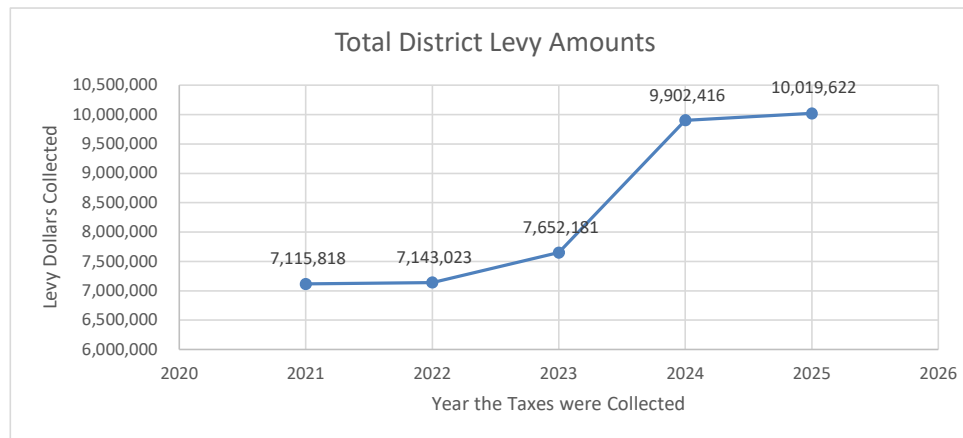
\*1 "Market Value" represents the combined valuation of all taxable properties within the district boundaries as assigned by an assessor.

\*2 "Referendum Market Value" represents the combined valuation of all taxable properties within the district boundaries excluding seasonal recreational properties (cabins) and agricultural land (over house, garage, and one acre of land).

\*3 "Net Tax Capacity" is determined by multiplying market values by the classification rates (homestead, commercial, residential, rental, etc.).

\*4 "Sales Ratio" is determined by the Department of Revenue. It measures the difference between the actual sale price and assessor's market value on properties to neutralize different assessment practices across the state.

\*5 "Adjusted Net Tax Capacity" is computed by dividing the net tax capacity by the sales ratio and is used for calculating most school taxes.



Saint Peter Public Schools  
 Levy 25, Pay 26, Fiscal Year 27  
 September 2025 Prelim. Levy Limitation and Certification - run 9.8.25

FY23 Final	FY24 Final	FY25 Final	FY26 Final	FY27 Prelim.	Difference
Levy 21	Levy 22	Levy 23	Levy 24	Levy 25	from Prior
Pay 22	Pay 23	Pay 24	Pay 25	Pay 26	Year Levy

General Fund										
Initial Levy Entries										
Operating Referendum (Voter Approved)	rmv	768,039.45	786,343.76	896,178.00	910,528.00	917,908.00		7,380.00	1	levy/aid
Prior-Year Adjustments										
Operating Referendum (Voter Approved)		6,724.09	(27,069.84)	11,418.19	20,533.19	13,357.27		(7,175.92)	2	
<b>Subtotal of Voter-Approved Referendum Levies</b>		<b>774,763.54</b>	<b>759,273.92</b>	<b>907,596.19</b>	<b>931,061.19</b>	<b>931,265.27</b>		<b>204.08</b>	3	

Initial Levy Entries										
Local Optional Revenue - Tier 1	rmv	362,093.98	370,723.60	447,000.69	512,098.13	526,262.55		14,164.42	4	levy/aid
Local Optional Revenue - Tier 2	rmv	820,542.81	904,080.97	926,779.20	941,619.20	949,251.20		7,632.00	5	levy/aid
Equity Levy	rmv	279,037.77	310,537.95	321,066.70	329,455.67	334,644.62		5,188.95	6	levy/aid
Transition Levy	rmv	48,787.46	53,754.43	55,104.01	55,986.36	56,440.14		453.78	7	levy/aid
Prior-Year Adjustments										
Board-Approved Referendum		2,774.51	-	-	-	-		-	8	
Local Optional Revenue		13,936.64	(46,956.45)	(1,912.92)	21,320.90	(24,641.43)		(45,962.33)	9	
Equity Levy		6,285.58	(7,375.37)	2,004.23	29,410.48	3,749.86		(25,660.62)	10	
Location Equity		6,766.17	-	-	-	-		-	11	
Transition Levy		989.97	(1,833.76)	(80.65)	4,913.36	767.16		(4,146.20)	12	
<b>Subtotal of Other Referendum Levies</b>		<b>1,541,214.89</b>	<b>1,582,931.37</b>	<b>1,749,961.26</b>	<b>1,894,804.10</b>	<b>1,846,474.10</b>		<b>(48,330.00)</b>	13	

Initial Levy Entries										
Operating Capital	ntc	143,600.04	157,368.43	187,117.32	202,074.74	200,400.85		(1,673.89)	14	66
Q Comp	ntc	204,609.44	196,092.92	185,885.70	188,621.16	190,362.90		1,741.74	15	levy/aid
Achievement and Integration	ntc	86,954.87	78,616.67	74,092.34	75,595.17	77,115.88		1,520.71	16	levy/aid
Re-Employment	ntc	25,000.00	75,000.00	10,000.00	16,000.00	10,000.00		(6,000.00)	17	all levy
Safe Schools	ntc	86,587.20	81,115.20	78,688.80	79,948.80	80,596.80		648.00	18	all levy
Career & Technical Education	ntc	110,633.30	115,779.56	153,506.97	186,199.60	186,199.60		-	19	levy/aid
Other Post-Employment Benefits (OPEB)	ntc	350,000.00	310,000.00	310,000.00	310,000.00	360,747.52		50,747.52	20	all levy
LTFM	ntc	415,482.56	402,136.63	411,689.29	600,847.91	611,504.60		10,656.69	21	levy/aid
Building Lease	ntc	40,167.82	42,512.25	42,512.21	43,787.68	55,959.78		12,172.10	22	all levy
Prior-Year Adjustments										
Operating Capital		6,700.95	292.66	879.45	(790.78)	844.04		1,634.82	23	
Q Comp		(15,255.74)	(1,272.54)	(5,921.65)	(2,314.26)	3,115.84		5,430.10	24	
Achievement and Integration		(17,635.28)	(9,326.11)	(3,359.19)	(97.64)	970.26		1,067.90	25	
Re-Employment		(7,437.28)	(25,000.00)	(11,839.88)	(71,820.00)	6,048.28		77,868.28	26	
Safe Schools		903.96	(3,472.56)	(5,004.72)	(4,447.80)	1,036.80		5,484.60	27	
Career & Technical Education		(4,328.85)	(7,472.87)	2,096.60	6,241.59	(19,601.36)		(25,842.95)	28	
Other Post-Employment Benefits (OPEB)		(40,000.00)	(40,000.00)	-	38,881.93	(35,514.96)		(74,396.89)	29	
LTFM		(13,971.19)	(45,327.96)	(7,735.05)	9,786.53	39,257.66		29,471.13	30	
Building Lease		757.08	772.12	-	1,106.14	-		(1,106.14)	31	
Other Adjustments (TIF, General, etc.)		-	-	-	(16,645.41)	(73,568.18)		(56,922.77)	32	
Abatement Adjustments		8,383.74	(3,331.61)	1,698.01	9,465.51	221.33		(9,244.18)	33	
<b>Subtotal of General Fund NTC</b>		<b>1,381,152.62</b>	<b>1,324,482.79</b>	<b>1,424,306.20</b>	<b>1,672,440.87</b>	<b>1,695,697.64</b>		<b>23,256.77</b>	34	

<b>Total of General Fund Categories</b>	<b>3,697,131.05</b>	<b>3,666,688.08</b>	<b>4,081,863.65</b>	<b>4,498,306.16</b>	<b>4,473,437.01</b>	<b>(24,869.15)</b>
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Saint Peter Public Schools  
 Levy 25, Pay 26, Fiscal Year 27  
 September 2025 Prelim. Levy Limitation and Certification - run 9.8.25

FY23 Final	FY24 Final	FY25 Final	FY26 Final	FY27 Prelim.	Difference
Levy 21	Levy 22	Levy 23	Levy 24	Levy 25	from Prior
Pay 22	Pay 23	Pay 24	Pay 25	Pay 26	Year Levy

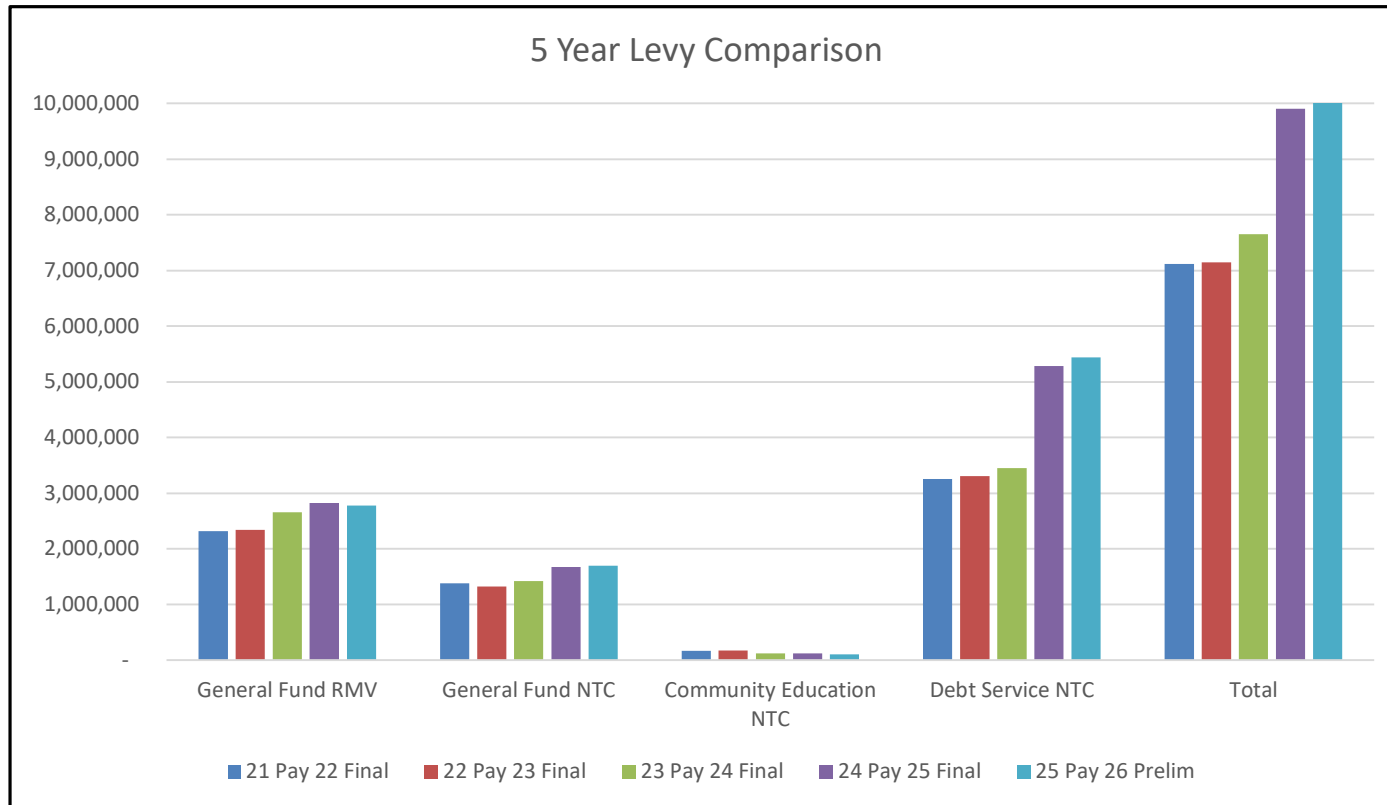
<b>Community Education Levy</b>									
<b>Initial Levy Entries</b>									
Basic Community Education	ntc	119,772.20	119,772.20	72,120.58	68,227.61	64,012.33		(4,215.28)	
ECFE	ntc	36,557.83	39,979.43	38,516.62	41,355.90	36,241.87		(5,114.03)	
Home Visits	ntc	638.75	784.59	1,109.40	1,158.35	1,096.89		(61.46)	
School Age Care	ntc	8,500.00	8,500.00	8,500.00	8,500.00	8,500.00		-	
<b>Prior-Year Adjustments</b>									
ECFE		243.40	(7.73)	(1,952.25)	(70.06)	(4,098.68)		(4,028.62)	
Home Visits		28.70	(27.89)	(85.37)	67.18	109.76		42.58	
Abatement Adjustments		452.71	(87.38)	81.23	608.83	19.23		(589.60)	
<b>Total of Community Education Categories</b>		<b>166,193.59</b>	<b>168,913.22</b>	<b>118,290.21</b>	<b>119,847.81</b>	<b>105,881.40</b>		<b>(13,966.41)</b>	
<b>Debt Service Levy</b>									
Voter Approved Bond	ntc	3,412,080.00	3,459,068.00	3,616,305.00	4,350,845.00	4,526,582.00		175,737.00	
LTFM Debt Service	ntc	-	-	-	986,379.19	1,077,030.81		90,651.62	
Reduction for Debt Excess	ntc	(168,820.92)	(151,719.81)	(165,963.52)	(51,420.33)	(153,253.71)		(101,833.38)	
Abatement Adjustments	ntc	9,234.40	73.89	1,685.91	(1,541.83)	554.01		2,095.84	
GDS Voter Net Offset Adjustment	ntc	-	-	-	-	-		-	
LTFM PY Adjustments	ntc	-	-	-	-	(10,609.78)		(10,609.78)	
<b>Total of Debt Service Categories</b>		<b>3,252,493.48</b>	<b>3,307,422.08</b>	<b>3,452,027.39</b>	<b>5,284,262.03</b>	<b>5,440,303.33</b>		<b>156,041.30</b>	
<b>Levy Totals</b>		<b>7,115,818.12</b>	<b>7,143,023.38</b>	<b>7,652,181.25</b>	<b>9,902,416.00</b>	<b>10,019,621.74</b>		<b>117,205.74</b>	<b>1.17%</b>
								<b>(0.00)</b>	

levy/aid  
 levy/aid  
 levy/aid  
 all levy

67

### 5 Year Levy Comparison

	21 Pay 22 Final	22 Pay 23 Final	23 Pay 24 Final	24 Pay 25 Final	25 Pay 26 Prelim	\$ Increase	% of Total
<b>General Fund RMV</b>	2,315,978	2,342,205	2,657,557	2,825,865	2,777,739	(48,126)	-41%
<b>General Fund NTC</b>	1,381,153	1,324,483	1,424,306	1,672,441	1,695,698	23,257	20%
<b>Community Education NTC</b>	166,194	168,913	118,290	119,848	105,881	(13,966)	-12%
<b>Debt Service NTC</b>	3,252,493	3,307,422	3,452,027	5,284,262	5,440,303	156,041	133%
<b>Total</b>	<b>7,115,818</b>	<b>7,143,023</b>	<b>7,652,181</b>	<b>9,902,416</b>	<b>10,019,622</b>	<b>117,206</b>	<b>-</b>





## ADDENDUM

**Regular Board Meeting  
Wednesday, September 17, 2025  
SPCC-Governor's Room  
5:00PM**

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### VII. ACTION ITEMS

<b>3. AGENDA ITEM #3</b>
--------------------------

**Subject:** Consider Approval of Teacher Substitute Rates

**Action:** Requires a Motion

**Background:** On a periodic basis, the Administrative Team makes a recommendation to the board to set the substitute teacher rate. Due to an apparent decrease in available substitute teachers and increased competition with area districts, the Administrative Team asks that the board consider setting the substitute teacher rate at \$200 per day/\$100 per half day. This is an increase of \$20 per day and \$10 per half day. The Business Committee reviewed and discussed the rates at its meeting on September 10, 2025, and recommends approval.

**Presentation:** Superintendent, Jon Graff  
Business Committee

**Options/Recommendation:** I recommend the approval of setting the 2025-2026 substitute teacher rate at \$200 per day and \$100 per half day.



## ADDENDUM

### REGULAR BOARD MEETING Wednesday, September 17, 2025 SPCC-Governor's Room 5:00PM

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#### VII. ACTION ITEMS

<b>4. AGENDA ITEM #4</b>
--------------------------

**Subject:** Consider Approval of Community Center Lease for the Community Education Program

**Action:** Requires a Motion

**Background:** The District leases five classrooms at the Saint Peter Community Center for its Community Education Program. The current three year lease is up for renewal and a new agreement has been drafted. The new lease agreement is identical to the current agreement with the exception of a 3% increase in each of the agreement's three years. Lease totals are as follows: year 1, \$3,985.27/month; year 2, \$4,104.83/month; year 3; \$4,227.97/month.

**Presentation:** Superintendent of Schools, Jon Graff

**Options/Recommendation:** I recommend your approval of the lease agreement with the City of Saint Peter for space at the Community Center for the Community Education Program.

**LEASE BY AND BETWEEN THE CITY OF SAINT PETER AND SAINT PETER SCHOOL  
DISTRICT NO. 508**

This Lease is made and entered into this \_\_\_\_\_ day of \_\_\_\_\_, 2025, by and between the City of Saint Peter, a Minnesota municipal corporation (**CITY**), and Saint Peter School District No. 508 Community Education, a Minnesota non-profit corporation (**TENANT**).

WHEREAS, the **CITY** has space within the Community Center to lease to various non-profit organizations;

WHEREAS, **TENANT** is engaged in the business of Community Education for all ages and is a Minnesota non-profit corporation;

WHEREAS, **TENANT** wishes to lease space from the **CITY** under the terms and conditions set forth herein.

NOW, THEREFORE, in consideration of the mutual promises and agreements, the parties make the following:

1. Description of Premises.

A. Rented premises include Rooms #s 206, 207, 208, 209 and 210 of the Community Center located at 600 South Fifth Street, Saint Peter, Minnesota.

B. Common areas include restrooms, hallways, kitchen facilities and storage cubicle.

C. **TENANT** shall have the right of ingress and egress through the halls and corridors of the building.

D. **TENANT** acquires no other right in any other part of the building than the parts herein specified.

E. **TENANT** shall have the right to use one, four (4) hour block of meeting room time each month of the lease. This use must be scheduled through the designated party at the City of Saint Peter.

F. Tenant shall have the right to schedule and use of the gymnasium and Governors' Room at no charge for elementary education, middle/high school athletics and public meetings.

2. Restrictions on Use. **TENANT** shall not use or permit the premises, or any part of the premises, to be used for any purposes other than those set forth in this lease. **TENANT** shall neither permit on the premises any act, sale, or storage that may be prohibited under standard forms of fire insurance policies, nor use the premises for any such purpose. In addition, no use shall be made or permitted to be made that result in:

A. Waste on the premises;

B. A public or private nuisance that may disturb the quiet enjoyment of other tenants in the building;

C. Improper, unlawful or objectionable use, including sale, storage or preparation of food, alcoholic beverages, or materials generating an odor on the premises; or

D. Noises or vibrations that may disturb other tenants.

E. Installation of signage within the facility without the express written approval of **CITY**.

**TENANT** shall comply with all governmental regulations and statutes affecting the premises either now or in the future.

3. Responsibility of **CITY**.

- A. General maintenance of the building.
- B. General maintenance of the grounds for all seasons.
- C. General maintenance of restrooms and hallways.
- D. Provide utility services of heat, electricity, garbage, water and sewer.
- E. Provide generation supervision of the building.
- F. Provide locks for building entrance and office entrance, and keys to tenants for the tenant's space.
- G. Provide phone lines to the building.
- H. Provide initial floor covering, wall construction, ceiling and overhead lighting.

4. Responsibility of **TENANT**.

- A. General maintenance of area leased by **TENANT**.
- B. **TENANT** agrees that **CITY** has no liability for property lost, stolen or damaged on the common or leased premises.
- C. General supervision and responsibility for securing the rented space.
- D. General supervision and responsibility for securing the building at all times other than 7:00 a.m. to 11:00 p.m., Monday through Friday -- or other such times as subsequently indicated by **CITY** upon written notice -- unless otherwise arranged with the Building Supervisor.
- E. Phone lines from the point of entry into the building to the leased premises and phone service.
- F. Tenant shall ensure that users under its supervision assist in the set-up and take-down of chairs, tables, and other equipment before and after athletic activities in the gym.

5. Term and Rent.

A. Term. This lease shall run for a period of three (3) years commencing on October 1, 2025 until September 30, 2028.

B. Rental. For a period of time from October 1, 2025 to September 30, 2026, **TENANT** shall pay, in advance, on the first day of each and every month, the sum of \$3,985.27.

For a period of time from October 1, 2026 to September 30, 2027, TENANT shall pay, in advance, on the first day of each and every month, the sum of \$4,104.83.

For a period of time from October 1, 2027 to September 30, 2028, TENANT shall pay, in advance, on the first day of each and every month, the sum of \$4,227.97.

C. Payments. Payments shall be made to the **CITY** at 227 South Front Street, Saint Peter, Minnesota.

D. Late Payments. A payment shall be delinquent if not paid by the 15th day of each month. A late charge of \$5.00 per day thereafter will be added to the amount due until paid. Failure to declare default on any particular payment that becomes delinquent shall not constitute a waiver of the rights to exercise the same at any subsequent time. If expenses are incurred or suit is commenced on this lease because of delinquent payments, **TENANT** agrees to pay all costs of collection, including reasonable attorney fees.

6. Default.

A. Events of Default. If **TENANT** does not pay the full amount of each monthly rental payment on the date it is due or violates any agreement contained in this lease, **TENANT** will be in default.

B. Right to Cancel. Upon evidence of default, **CITY** shall have the right to cancel and terminate this lease, as well as all of the right, title and interest of **TENANT** under this lease.

C. Notice of Default. If **TENANT** is in default, **CITY** may give **TENANT** 30 days' notice of the cancellation and termination.

D. Remedies on Default. On expiration of the time fixed in the notice and **TENANT**'s failure to cure the default within the time allowed in the notice, this lease and the right, title and interest of **TENANT** shall terminate.

**CITY** shall have the right to obtain reimbursement from **TENANT** of all expenses incurred in regaining possession of the premises and the right to recover all additional rental required under the lease term if **CITY** re-enters and re-lets the premises for the benefit of **TENANT**.

On expiration of the time fixed in the notice and **TENANT**'s failure to cure the default within the time allowed in the notice, **CITY** may enter immediately and remove the property and personnel of **TENANT**, and store the property in a public warehouse or at a place selected by **CITY**, at the expense of **TENANT**. **CITY** may resort to any legal proceedings to obtain the possession of the premises and disposal of **TENANT**'s property.

**CITY** may elect, but shall not be obligated to make any payment required of **TENANT** or comply with any agreement, term or condition required to be performed by **TENANT**, for the purpose of correcting or remedying any such default at the expense of **TENANT**. Any expenditure for the correction by **CITY** shall not be deemed to waive or release **TENANT**'s default or **CITY**'s right to take any action as may be otherwise permissible hereunder in the case of any default.

7. Modifications. There shall be no modifications or materials affixed to the interior or exterior walls, doors, windows, floors or other inner structure of the leased premises without the express written approval of the **CITY**.

8. Damage. If the premises or any portion of the building or any equipment contained therein during the term of this lease shall be damaged by the act, default or negligence of **TENANT**, or

of **TENANT's** agents, employees, patrons, guests or any person admitted to the premises by **TENANT**, **TENANT** will pay to the **CITY** upon demand such sum as shall be necessary to restore the premises or equipment contained therein to their present condition.

**TENANT** hereby assumes full responsibility for the character, acts, and conduct of all person admitted to the premises or any portion of said building by the consent of **TENANT** or by or with the consent of any person acting for or on behalf of **TENANT**.

9. Insurance. It shall be the responsibility of **TENANT** to assure that its leased premises and personal property are covered by hazard and public liability insurance policies. The public liability insurance policy shall provide coverage at least in the amount of the **CITY's** maximum liability limits as set by statute. **TENANT** shall at the request of the **CITY** provide proof of insurance coverage required by this section.

10. Indemnification. **TENANT** covenants and agrees to save **CITY** harmless and to indemnify **CITY** against any claims or liabilities for compensation which may arise or accrue by reason of the use of **TENANT**, **TENANT's** agents, employees, patrons, guests or any person admitted to the premises by **TENANT**.

11. Casualty. In case said building or any part thereof shall be destroyed or damaged by fire or any other cause, or if any other casualty or unforeseen occurrence renders the fulfillment of this lease by **CITY** impossible, the **CITY** may terminate the lease, and **TENANT** shall pay rent for said premises only up to the time of such termination, at the rate set in this lease. **CITY** waives any claims or damages or compensation from **TENANT** should this lease be so terminated.

12. Option to Renew. **TENANT** shall have the option to renew this lease before **CITY** offers the premises to any other party. Written notice of intention to renew must be furnished to the **CITY** 120 days prior to the expiration of the lease or any renewal hereunder. The terms of the lease shall be subject to renegotiation at the time of any renewal with the proposed rental price furnished to **TENANT** 90 days prior to the expiration of the lease.

13. Mail Distribution. All tenant mail shall be distributed from the central mail facility. Each tenant will be assigned a Post Office Box. No tenant mail will be delivered directly to the tenant's leased space. There shall be a nominal Post Office box key rental fee.

14. Election Regulation Compliance. **TENANT** shall be required to comply with all State election regulations including removal of any and all campaign materials from the leased property and/or parking lot when the building is being used as a polling place and/or as directed by City officials.

15. Termination Prior To End of Lease Term. In the event the **TENANT** completes or reasonably anticipates completion of construction of its own building, then **TENANT** may terminate this lease without penalty by giving **CITY** one hundred and twenty (120) days written notice.

16. Waivers. The failure of the **CITY** to insist on a strict performance of any of the terms and conditions of this Lease shall not be deemed a waiver of any subsequent breach or default of any terms or conditions of this Lease.

17. Notice. All notices to be given with respect to this Lease shall be in writing. Each notice shall be sent by registered or certified mail, postage pre-paid and return receipt requested to the parties as follows:

**CITY OF SAINT PETER**  
Attn: City Administrator  
227 South Front Street  
Saint Peter, Minnesota 56082

**SCHOOL DISTRICT #508**  
Attn: Superintendent of Schools  
100 Lincoln Drive  
Saint Peter, Minnesota 56082

18. Surrender of Possession. **TENANT** shall, on the last day of the term or renewal, or on earlier termination or forfeiture of the lease, peaceably and quietly surrender and deliver the lease premises to the **CITY** free of any encumbrance placed on it by **TENANT**, except movable trade fixtures, all in good condition and repair. In the event **TENANT** does not remove its personal property at the termination or default of the Lease, the **CITY** may elect to consider the property abandoned and the property of the **CITY** without any further payment or offset.
19. Assignment. This Lease may not be assigned by either party without the written consent of the other party. The written consent shall not be unreasonably withheld.
20. Total Agreement. This Lease contains the entire agreement between the parties and cannot be changed or terminated except by a written instrument executed by all parties. This Lease and terms and conditions of the Lease apply to and are binding on the legal representatives, successors and assigns of both parties.
21. **APPLICABLE LAW. THIS AGREEMENT SHALL BE GOVERNED BY AND CONSTRUED IN ACCORDANCE WITH THE LAWS OF THE STATE OF MINNESOTA.**
22. **TIME OF THE ESSENCE. TIME IS OF THE ESSENCE AND ALL TERMS OF THIS LICENSE.**
23. Further Assurances. Each of the parties agree to execute all documents and instruments and to take or to cause to be taken all action which are necessary or appropriate to comply with the terms of this Agreement.
24. Amendments, Supplements, etc. This Agreement may be amended or supplemented at any time by additional written agreements as may mutually be determined by the parties to be necessary, desirable, or expedient to further the purpose of this Agreement or to clarify the intention of the parties.
25. Rights Cumulative. All rights and remedies of each of the parties under this Agreement will be cumulative, and the exercise of one or more rights or remedies will not preclude the exercise of any other right or remedy available under this Agreement or applicable law.
26. Severability. Any term or provision of this Agreement that is invalid or unenforceable will not be ineffective to the extent of such invalidity or unenforceability without rendering invalid or unenforceable but remaining rights of the party benefiting from the provision or any other provisions of this Agreement.
27. Execution of Counter-Parts. This Agreement may be executed by one or more counter-parts, each of which will be deemed an original, but all of which together shall constitute one and the same agreement.
28. No Reliance. **CITY** and **TENANT** represent to one another that each has read this Agreement and has obtained such advice from counsel as deemed appropriate under the circumstances. Except as clearly indicated, **CITY** and **TENANT** have not relied on any promises or representations of the other.





## ADDENDUM

**Regular Board Meeting  
Wednesday, September 17, 2025  
SPCC-Governor's Room  
5:00PM**

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### VII. ACTION ITEMS

<b>5. AGENDA ITEM #5</b>
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**Subject:** Consider Policies for Approval with a Single Reading

**Action:** Requires a Motion

**Background:** Recent legislative changes have led to minor changes in the following policies. In addition four policies require updates due to staffing changes. They are being brought forward for approval with a single reading.

**Policy 418:** Drug-Free Workplace/Drug-Free School

- MSBA updates include language on Tribal Medical Cannabis Programs pursuant to updates to Minnesota Legislature and additional information in the policies resources section.

**Policy 534:** School Meals

- MSBA updates include language connected to Free Meals Program

*Policies Requiring Updates Due to Staffing Changes:*

**Policy 402:** Disability Nondiscrimination

- Current policy aligns with MSBA's most recent revision.
- Updates must be made to reflect the name of the district's new 504 Coordinator

**Policy 413:** Harassment and Violence

- Current policy aligns with MSBA's most recent revision.
- Updates must be made to reflect the name of the district's new human rights officer

**Policy 521:** Student Disability Nondiscrimination

- Current policy aligns with MSBA's most recent revision.

- Updates must be made to reflect the name of the district's new 504 coordinator.

**Policy 722:** Public Data and Data Subject Requests

- Current policy aligns with MSBA's most recent revision
- Updates must be made to Data Practice Contacts to reflect current superintendent

These policies were reviewed by the Policy Committee at their September 10th meeting and the committee recommends their approval with a single reading.

**Presentation:** Superintendent of Schools, Jon Graff  
Policy Review Committee

**Options/Recommendation:** I recommend your approval of Policies 418, 534, 402, 413, 521, and 722 with a single reading.

## **418 DRUG-FREE WORKPLACE/DRUG-FREE SCHOOL**

**[NOTE: School districts are required by statute to have a policy addressing these issues.]**

### **I. PURPOSE**

The purpose of this policy is to maintain a safe and healthful environment for employees and students by prohibiting the use of alcohol, toxic substances, medical cannabis, nonintoxicating cannabinoids, edible cannabinoid products, and controlled substances without a physician's prescription.

### **II. GENERAL STATEMENT OF POLICY**

- A. Use or possession of alcohol, toxic substances, medical cannabis, nonintoxicating cannabinoids, edible cannabinoid products, and controlled substances before, during, or after school hours, at school or in any other school location, is prohibited as general policy. Paraphernalia associated with controlled substances is prohibited.
- B. A violation of this policy occurs when any student, teacher, administrator, other school district personnel, or member of the public uses or possesses alcohol, toxic substances, medical cannabis, nonintoxicating cannabinoids, edible cannabinoid products, or controlled substances in any school location.
- C. An individual may not use or possess cannabis flower, cannabis products, lower-potency hemp edibles, or hemp-derived consumer products in a public school, as defined in Minnesota Statutes, section 120A.05, subdivisions 9, 11, and 13, including all facilities, whether owned, rented, or leased, and all vehicles that the school district owns, leases, rents, contracts for, or controls.
- D. The school district will act to enforce this policy and to discipline or take appropriate action against any student, teacher, administrator, school personnel, or member of the public who violates this policy.

### **III. DEFINITIONS**

- A. "Alcohol" includes any alcoholic beverage containing more than one-half of one percent alcohol by volume.
- B. "Controlled substances" include narcotic drugs, hallucinogenic drugs, amphetamines, barbiturates, marijuana, anabolic steroids, or any other controlled substance as defined in Schedules I through V of the Controlled Substances Act, 21 United States Code, section 812, including analogues and look-alike drugs.
- C. "Edible cannabinoid product" means any product that is intended to be eaten or consumed as a beverage by humans, contains a cannabinoid in combination with food ingredients, and is not a drug.
- D. "Nonintoxicating cannabinoid" means substances extracted from certified hemp plants that do not produce intoxicating effects when consumed by injection, inhalation, ingestion, or by any other immediate means.
- E. "Medical cannabis" means any species of the genus cannabis plant, or any mixture or preparation of them, including whole plant extracts and resins, and is delivered in the form of: (1) liquid, including, but not limited to, oil; (2) pill; (3) vaporized delivery

method with use of liquid or oil but which does not require the use of dried leaves or plant form; (4) combustion with use of dried raw cannabis; or (5) any other method approved by the Commissioner of the Minnesota Department of Health ("Commissioner").

- F. "Possess" means to have on one's person, in one's effects, or in an area subject to one's control.
- G. "School location" includes any school building or on any school premises; in any school-owned vehicle or in any other school-approved vehicle used to transport students to and from school or school activities; off school property at any school-sponsored or school-approved activity, event, or function, such as a field trip or athletic event, where students are under the jurisdiction of the school district; or during any period of time such employee is supervising students on behalf of the school district or otherwise engaged in school district business.
- H. "Sell" means to sell, give away, barter, deliver, exchange, distribute or dispose of to another, or to manufacture; or to offer or agree to perform such an act, or to possess with intent to perform such an act.
- I. "Toxic substances" includes: (1) glue, cement, aerosol paint, containing toluene, benzene, xylene, amyl nitrate, butyl nitrate, nitrous oxide, or containing other aromatic hydrocarbon solvents, but does not include glue, cement, or paint contained in a packaged kit for the construction of a model automobile, airplane, or similar item; (2) butane or a butane lighter; or (3) any similar substance declared to be toxic to the central nervous system and to have a potential for abuse, by a rule adopted by the Commissioner.
- I. "Use" means to sell, buy, manufacture, distribute, dispense, be under the influence of, or consume in any manner, including, but not limited to, consumption by injection, inhalation, ingestion, or by any other immediate means.

#### **IV. EXCEPTIONS**

- A. A violation of this policy does not occur when a person brings onto a school location, for such person's own use, a controlled substance, except medical cannabis, nonintoxicating cannabinoids, or edible cannabinoid products, which has a currently accepted medical use in treatment in the United States and the person has a physician's prescription for the substance. The person shall comply with the relevant procedures of this policy.
- B. A violation of this policy does not occur when a person possesses an alcoholic beverage in a school location when the possession is within the exceptions of Minnesota Statutes, section 624.701, subdivision 1a (experiments in laboratories; pursuant to a temporary license to sell liquor issued under Minnesota laws or possession after the purchase from such a temporary license holder).
- C. A violation of this policy does not occur when a person uses or possesses a toxic substance unless they do so with the intent of inducing or intentionally aiding another in inducing intoxication, excitement, or stupefaction of the central nervous system, except under the direction and supervision of a medical doctor.
- D. The school district may not refuse to enroll or otherwise penalize a patient or person enrolled in the Minnesota Patient Registry Program [or a Tribal medical cannabis program](#) as a pupil solely because the patient or person is enrolled in the registry program [or a Tribal medical cannabis program](#), unless failing to do so would violate federal law or regulations or cause the school to lose a monetary or licensing-related benefit under federal law or regulations.

[An employer or a school must provide written notice to a patient at least 14 days before the employer or school takes an action against the patient that is prohibited under](#)

Minnesota Statutes, section 342.57, subdivision 3 or 5. The written notice must cite the specific federal law or regulation that the employer or school believes would be violated if the employer or school fails to take action. The notice must specify what monetary or licensing-related benefit under federal law or regulations that the employer or school would lose if the employer or school fails to take action.

A school or an employer must not retaliate against a patient for asserting the patient's rights or seeking remedies under Minnesota Statutes, section 342.57 or section 152.32.

**[NOTE: The 2025<sup>4</sup> Minnesota legislature amended this law.] ~~to add this protection.~~]**

## V. PROCEDURES

- A. Students who have a prescription from a physician for medical treatment with a controlled substance, except medical cannabis, nonintoxicating cannabinoids, or edible cannabinoid products, must comply with the school district's student medication policy.

~~**[NOTE: School districts are required by Minnesota Statutes, section 121A.22 to develop procedures for the administration of drugs and medicine. If the school district does not have a student medication policy such as MSBA/MASA Model Policy 516, this Paragraph A. can be modified to provide: "Students who have a prescription from a physician for medical treatment with a controlled substance, except medical cannabis, nonintoxicating cannabinoids, or edible cannabinoid products, must provide a copy of the prescription and the medication to the school nurse, principal, or other designated staff member. The school district's licensed school nurse, trained health clerk, principal, or teacher will administer the prescribed medication except medical cannabis, nonintoxicating cannabinoids, or edible cannabinoid products, in accordance with school district procedures."]**~~

- B. Employees who have a prescription from a physician for medical treatment with a controlled substance, except medical cannabis, nonintoxicating cannabinoids, or edible cannabinoid products, are permitted to possess such controlled substance and associated necessary paraphernalia, such as an inhaler or syringe. The employee must inform his or her supervisor. The employee may be required to provide a copy of the prescription.
- C. Each employee shall be provided with written notice of this Drug-Free Workplace/Drug-Free School policy and shall be required to acknowledge that he or she has received the policy.

**[NOTE: The Drug-Free Workplace Act requires that school district employees be notified by a published statement of the prohibition of the use of controlled substances and actions that will be taken against employees for violations of such prohibition (41 United States Code section 8103; 34 Code of Federal Regulations Part 84). An acknowledgment will document satisfaction by the school district of this federal requirement.]**

- D. Employees are subject to the school district's drug and alcohol testing policies and procedures.
- E. Members of the public are not permitted to possess controlled substances, intoxicating cannabinoids, or edible cannabinoid products in a school location except with the express permission of the superintendent.
- F. No person is permitted to possess or use medical cannabis, nonintoxicating cannabinoids, or edible cannabinoid products on a school bus or van; or on the grounds of any preschool or primary or secondary school; or on the grounds of any child care facility. This prohibition includes (1) vaporizing or combusting medical cannabis on any

form of public transportation where the vapor or smoke could be inhaled by a minor child or in any public place, including indoor or outdoor areas used by or open to the general public or place of employment; and (2) operating, navigating, or being in actual physical control of any motor vehicle or working on transportation property, equipment or facilities while under the influence of medical cannabis, nonintoxicating cannabinoids, or edible cannabinoid products.

- G. Possession of alcohol on school grounds pursuant to the exceptions of Minnesota Statutes, section 624.701, subdivision 1a, shall be by permission of the school board only. The applicant shall apply for permission in writing and shall follow the school board procedures for placing an item on the agenda.

## **VI. SCHOOL PROGRAMS**

- A. Starting in the 2026-2027 school year, the school district must implement a comprehensive education program on cannabis use and substance use, including but not limited to the use of fentanyl or mixtures containing fentanyl, for students in middle school and high school. The program must include instruction on the topics listed in Minnesota Statutes, section 120B.215, subdivision 1 and must:
  - 1. respect community values and encourage students to communicate with parents, guardians, and other trusted adults about cannabis use and substance use, including but not limited to the use of fentanyl or mixtures containing fentanyl; and
  - 2. refer students to local resources where students may obtain medically accurate information about cannabis use and substance use, including but not limited to the use of fentanyl or mixtures containing fentanyl, and treatment for a substance use disorder.

**[\[NOTE: MDE information on this requirement is provided in the Resources section of this model policy.\]](#)**

- B. School district efforts to develop, implement, or improve instruction or curriculum as a result of the provisions of this section must be consistent with Minnesota Statutes, sections 120B.10 and 120B.11.
- C. Notwithstanding any law to the contrary, the school district shall have a procedure for a parent, a guardian, or an adult student 18 years of age or older to review the content of the instructional materials to be provided to a minor child or to an adult student pursuant to this article. The district must allow a parent or adult student to opt out of instruction under this article with no academic or other penalty for the student and must inform parents and adult students of this right to opt out.

## **VII. ENFORCEMENT**

- A. Students
  - 1. Students may be required to participate in programs and activities that provide education against the use of alcohol, tobacco, marijuana, smokeless tobacco products, electronic cigarettes, and nonintoxicating cannabinoids, and edible cannabinoid products.
  - 2. Students may be referred to drug or alcohol assistance or rehabilitation programs; school based mental health services, mentoring and counseling, including early identification of mental health symptoms, drug use and violence and appropriate referral to direct individual or group counselling service, which may be provided by school based mental health services providers; and/or referral to law enforcement officials when appropriate.

3. A student who violates the terms of this policy shall be subject to discipline in accordance with the school district's discipline policy. Such discipline may include suspension or expulsion from school.

**B. Employees**

1. As a condition of employment in any federal grant, each employee who is engaged either directly or indirectly in performance of a federal grant shall abide by the terms of this policy and shall notify his or her supervisor in writing of his or her conviction of any criminal drug statute for a violation occurring in any of the places listed above on which work on a school district federal grant is performed, no later than five (5) calendar days after such conviction. Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes.
2. An employee who violates the terms of this policy is subject to disciplinary action, including nonrenewal, suspension, termination, or discharge as deemed appropriate by the school board.
3. In addition, any employee who violates the terms of this policy may be required to satisfactorily participate in a drug and/or alcohol abuse assistance or rehabilitation program approved by the school district. Any employee who fails to satisfactorily participate in and complete such a program is subject to nonrenewal, suspension, or termination as deemed appropriate by the school board.
4. Sanctions against employees, including nonrenewal, suspension, termination, or discharge shall be pursuant to and in accordance with applicable statutory authority, collective bargaining agreements, and school district policies.

**C. The Public**

A member of the public who violates this policy shall be informed of the policy and asked to leave. If necessary, law enforcement officials will be notified and asked to provide an escort.

- Legal References:**
- Minn. Stat. § 120B.215 (Education on Cannabis Use and Substance Use)
  - Minn. Stat. § 121A.22 (Administration of Drugs and Medicine)
  - Minn. Stat. § 121A.40-§ 121A.56 (Pupil Fair Dismissal Act)
  - Minn. Stat. § 151.72 (Sale of Certain Cannabinoid Products)
  - Minn. Stat. § 152.01, Subd. 15a (Definitions)
  - Minn. Stat. § 152.0264 (Cannabis Sale Crimes)
  - Minn. Stat. § 152.22, Subd. 6 (Definitions; Medical Cannabis)
  - Minn. Stat. § 152.23 (Limitations; Medical Cannabis)
  - Minn. Stat. § 169A.31 (Alcohol-Related School Bus or Head Start Bus Driving)
  - Minn. Stat. § 340A.101 (Definitions; Alcoholic Beverage)
  - Minn. Stat. § 340A.403 (3.2 Percent Malt Liquor Licenses)
  - Minn. Stat. § 340A.404 (Intoxicating Liquor; On-Sale Licenses)
  - Minn. Stat. § 342.09 (Personal Adult Use of Cannabis)
  - Minn. Stat. § 342.56 (Limitations)
  - Minn. Stat. § 609.684 (Abuse of Toxic Substances)
  - Minn. Stat. § 624.701 (Alcohol in Certain Buildings or Grounds)
  - 20 U.S.C. § 7101-7122 (Student Support and Academic Enrichment Grants)
  - 21 U.S.C. § 812 (Schedules of Controlled Substances)
  - 41 U.S.C. §§ 8101-8106 (Drug-Free Workplace Act)
  - 21 C.F.R. §§ 1308.11-1308.15 (Controlled Substances)
  - 34 C.F.R. Part 84 (Government-Wide Requirements for Drug-Free Workplace)

- Cross References:** MSBA/MASA Model Policy 403 (Discipline, Suspension, and Dismissal of School

District Employees)  
MSBA/MASA Model Policy 416 (Drug and Alcohol Testing)  
MSBA/MASA Model Policy 417 (Chemical Use and Abuse)  
MSBA/MASA Model Policy 419 (Tobacco-Free Environment; Possession and use of Tobacco, Tobacco-Related Devices, and Electronic Delivery Devices; Vaping Awareness and Prevention Instruction)  
MSBA/MASA Model Policy 506 (Student Discipline)  
MSBA/MASA Model Policy 516 (Student Medication)

**Resources:**

To support the requirements for school districts and charter schools outlined in Minnesota Statute 2024, section 120B.215, subdivision 2, and in accordance with subdivision 1, MDE, in collaboration with MDH, the Minnesota Department of Human Services (DHS), and education experts, has created a

[List of Model Cannabis Education Programs for School District and Charter School Consideration.](#)

Schools may choose to implement one of the listed programs or they may implement their own program(s) identified through a local curriculum adoption process by the 2026-27 school year. While it is not required for a school district or charter school to use one of the programs in the list, the list and rubric provided may be useful to school districts and charter schools in their own decision-making process.

Please visit [MDE's Health Education webpage](#) for more information.

Adopted: \_\_\_\_\_

*MSBA/MASA Model Policy 534*  
Orig. 2017  
Rev. 2025<sup>3</sup>

Revised: September 2025

## 534 SCHOOL MEALS POLICY

**[NOTE: In 2021, the Minnesota legislature amended Minnesota Statutes, section 124D.111, to require that Minnesota school districts that participate in the national school lunch program adopt a school meals policy. In 2023, the Minnesota legislature amended the statute to create the free school meals program].**

~~**[NOTE: This MSBA/MASA model policy is drafted to be consistent for all grade levels. However, local school districts may vary the meal charge policy for elementary, middle, and high schools.]**~~

~~**[NOTE: School districts must follow appropriate debt collection practices when attempting to recover unpaid a la carte item or second meal charges.]**~~

### I. PURPOSE

The purpose of this policy is to ensure that students receive healthy and nutritious meals through the school district's nutrition program and that school district employees, families, and students have a shared understanding of expectations regarding meal charges. The policy of the school district is to provide meals to students in a respectful manner and to maintain the dignity of students by prohibiting lunch shaming or otherwise ostracizing the student. The policy seeks to allow students to receive the nutrition they need to stay focused during the school day and minimize identification of students with insufficient funds to pay for a la carte items or second meals as well as to maintain the financial integrity of the school nutrition program.

### II. PAYMENT OF MEALS

~~**[NOTE: Payment systems and procedures will likely vary from school district to school district. The school district should select one of the following options and delete the remaining options.]**~~

A. ~~*[OPTION 1: All a la carte items or second meal purchases are to be prepaid before meal service begins. [Insert description for how families may add money to students' accounts (e.g., electronic payment options, pay at the school office, etc.).] A student who does not have sufficient funds will not be allowed to charge a la carte items or a second meal until additional money is deposited in the student's account.]*~~

~~*[OPTION 2: Students have use of a meal account. When the balance reaches zero, a student may charge no more than \$20[insert amount] or [insert number of meals] to this account]. When an account reaches this limit, a student shall not be allowed to charge second meals or a la carte items until the negative account balance is paid. [Insert description for how families may add money to students' accounts (e.g., electronic payment options, pay at the school office, etc.).]*~~

~~*[OPTION 3: Insert a school district-specific process for payment of a la carte items or second meals.]*~~

#### B. Free School Meals Program

1. The free school meals program is created within the Minnesota Department of Education

2. Each school that participates in the United States Department of Agriculture National School Lunch program and has an Identified Student Percentage below the federal percentage determined for all meals to be reimbursed at the free

rate via the Community Eligibility Provision must participate in the free school meals program.

3. Each school that participates in the United States Department of Agriculture National School Lunch program and has an Identified Student Percentage at or above the federal percentage determined for all meals to be reimbursed at the free rate must participate in the federal Community Eligibility Provision in order to participate in the free school meals program.

4. Each school that participates in the free school meals program must:

a. participate in the United States Department of Agriculture School Breakfast Program and the United States Department of Agriculture National School Lunch Program; and

b. provide to all students at no cost up to two federally reimbursable meals per school day, with a maximum of one free breakfast and one free lunch.

c. A student who has been determined eligible for free and reduced-price meals must always be served a reimbursable meal even if the student has an outstanding debt.

[NOTE: While subparagraph 3. above is inherent given subparagraph 2., MSBA recommends that school boards consider including subparagraph 3., which is stated in Minnesota Statutes, section 124D.111.]

C. Once a meal has been placed on a student's tray or otherwise served to a student, the meal may not be subsequently withdrawn from the student by the cashier or other school official, whether or not the student has an outstanding meals balance.

D. When a student has a negative account balance, the student will not be allowed to charge a snack item.

E. If a parent or guardian chooses to send in one payment that is to be divided between sibling accounts, the parent or guardian must specify how the funds are to be distributed to the students' accounts. Funds may not be transferred between sibling accounts unless written permission is received from the parent or guardian.

F. A student may purchase a second breakfast at the nonprogram price if the student has already selected a reimbursable breakfast.

G. A student may purchase a second lunch at the nonprogram price if the student has already selected a reimbursable lunch.

[NOTE: New paragraphs F and G apply if a school district receives school breakfast aid under Minnesota Statutes, section 124D.111 or school lunch aid under Minnesota Statutes, section 124D.111 respectively.]

### III. LOW OR NEGATIVE ACCOUNT BALANCES – NOTIFICATION

A. The school district will make reasonable efforts to notify families when meal account balances are low or fall below zero.

B. ~~Families will be notified of an outstanding negative balance once the negative balance reaches \$[insert amount] or [insert number of meals]. Families will be notified by [insert the method used to notify families (e.g., automated calling system, email, letters sent home)].~~

- C. Reminders for payment of outstanding student meal balances will not demean or stigmatize any student participating in the school lunch program, including, but not limited to, dumping meals, withdrawing a meal that has been served, announcing or listing students' names publicly, providing alternative meals not specifically related to dietary needs; providing nonreimbursable meals; or affixing stickers, stamps, or pins.

#### IV. UNPAID MEAL CHARGES

- A. The school district will make reasonable efforts to communicate with families to resolve the matter of unpaid charges. Where appropriate, families may be encouraged to apply for free or reduced-price meals for their children.
- B. The school district will make reasonable efforts to collect unpaid meal charges classified as delinquent debt. Unpaid meal charges are designated as delinquent debt when payment is overdue, the debt is considered collectable, and efforts are being made to collect it.
- C. Negative balances of more than \$200~~[insert amount]~~, not paid prior to the end of the school year~~[enter time period (e.g., end of the month, end of the semester, end of the school year)]~~, will be turned over to the superintendent or superintendent's designee for collection. In some instances, the school district does use a collection agency to collect unpaid school meal debts after reasonable efforts first have been made by the school district to collect the debt. Collection options may include, but are not limited to, use of collection agencies, claims in the conciliation court, or any other legal method permitted by law.
- D. The school district may not enlist the assistance of non-school district employees, such as volunteers, to engage in debt collection efforts.
- E. The school district will not impose any other restriction prohibited under Minnesota Statutes, section 123B.37 due to unpaid student meal balances. The school district will not limit a student's participation in any school activities, graduation ceremonies, field trips, athletics, activity clubs, or other extracurricular activities or access to materials, technology, or other items provided to students due to an unpaid student meal balance.

**[NOTE: School districts that use a collection agency to collect unpaid school meals debt must address this in this policy. A new paragraph F. can be added to address the use of a collection agency.]**

#### V. COMMUNICATION OF POLICY

- A. This policy and any pertinent supporting information shall be provided in writing (i.e., mail, email, back-to-school packet, student handbook, etc.) to:
  - 1. all households at or before the start of each school year;
  - 2. students and families who transfer into the school district, at the time of enrollment; and
  - 3. all school district personnel who are responsible for enforcing this policy.
- B. The school district will post this policy on the school district's website, or the website of the organization where the meal is served, in addition to providing the required written notification described above.
- C. If the school district contracts with a third party for its meal services, it will provide the vendor with its school meals policy. The school district will ensure that any third-party provider with whom the school district enters into either an original or modified contract after July 1, 2021, adheres to the school district's school meals policy.

**Legal References:** Minn. Stat. § 123B.37 (Prohibited Fees)  
Minn. Stat. § 124D.111 (School Meals Policies; Lunch Aid; Food Service Accounting)  
42 U.S.C. § 1751 *et seq.* (Healthy and Hunger-Free Kids Act)  
7 C.F.R. § 210 *et seq.* (School Lunch Program Regulations)  
7 C.F.R. § 220.8 (School Breakfast Program Regulations)  
USDA Policy Memorandum SP 46-2016, Unpaid Meal Charges: Local Meal Charge Policies (2016)  
USDA Policy Memorandum SP 47-2016, Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments (2016)  
USDA Policy Memorandum SP 23-2017, Unpaid Meal Charges: Guidance and Q&A

**Cross References:** None

Adopted: \_\_\_\_\_

MSBA/MASA Model Policy 402  
Orig. 1995  
Rev. 20152022

Revised: [September 2025](#)

## 402 DISABILITY NONDISCRIMINATION POLICY

**[Note: School districts are required by statute to have a policy addressing these issues.]**

### I. PURPOSE

The purpose of this policy is to provide a fair employment setting for all persons and to comply with state and federal law.

### II. GENERAL STATEMENT OF POLICY

- A. The school district shall not discriminate against qualified individuals with disabilities because of the disabilities of such individuals in regard to job application procedures, hiring, advancement, discharge, compensation, job training, and other terms, conditions, and privileges of employment.
- B. The school district shall not engage in contractual or other arrangements that have the effect of subjecting its qualified applicants or employees with disabilities to discrimination on the basis of disability. The school district shall not exclude or otherwise deny equal jobs or job benefits to a qualified individual because of the known disability of an individual with whom the qualified individual is known to have a relationship or association.
- C. The school district shall make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, unless the accommodation would impose undue hardship on the operation of the business of the school district.
- D. Any job applicant or employee wishing to discuss the need for a reasonable accommodation, or other matters related to a disability or the enforcement and application of this policy, should contact [Kari Lauwagie, 504 Coordinator, 100 Lincoln Drive, Saint Peter, MN 56082, 507-934-4210, \[klauwagie@stpetersschools.org\]\(mailto:klauwagie@stpetersschools.org\)](#) ~~(list the name, title, office address, telephone number, and e-mail address).~~ This individual is the school district's appointed ADA/Section 504 coordinator.

**Legal References:** Minn. Stat. Ch. 363A (Minnesota Human Rights Act)  
29 U.S.C. § 794 *et seq.* (~~Section 504 of the~~ Rehabilitation Act of 1973, ~~§ 504~~)  
42 U.S.C., ~~Ch. 126~~ § 1211201 (Americans with Disabilities Act)  
29 C.F.R. Part 32 (~~Nondiscrimination on the Basis of Handicap in Programs or Activities Receiving Federal Financial Assistance~~)  
~~34 C.F.R. Part 35~~  
34 C.F.R. Part 104 (~~Nondiscrimination on the Basis of Handicap in Programs or Activities Receiving Federal Financial Assistance~~)

**Cross References:** [MSBA/MASA Model Policy 413 \(Harassment and Violence\)](#)  
[MSBA/MASA Model Policy 521 \(Student Disability Nondiscrimination\)](#)

## **413 HARASSMENT AND VIOLENCE**

### **I. PURPOSE**

The purpose of this policy is to maintain a learning and working environment that is free from harassment and violence on the basis of race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability.

### **II. GENERAL STATEMENT OF POLICY**

- A. The policy of the school district is to maintain a learning and working environment that is free from harassment and violence on the basis of race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability. The school district prohibits any form of harassment or violence on the basis of race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability.
- B. A violation of this policy occurs when any student, teacher, administrator, or other school district personnel harasses a student, teacher, administrator, or other school district personnel or group of students, teachers, administrators, or other school district personnel through conduct or communication based on a person's race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability, as defined by this policy. (For purposes of this policy, school district personnel include school board members, school employees, agents, volunteers, contractors, or persons subject to the supervision and control of the district.)
- C. A violation of this policy occurs when any student, teacher, administrator, or other school district personnel inflicts, threatens to inflict, or attempts to inflict violence upon any student, teacher, administrator, or other school district personnel or group of students, teachers, administrators, or other school district personnel based on a person's race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability.
- D. The school district will act to investigate all complaints, either formal or informal, verbal or written, of harassment or violence based on a person's race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability, and to discipline or take appropriate action against any student, teacher, administrator, or other school district personnel who is found to have violated this policy.

### **III. DEFINITIONS**

- A. "Assault" is:
  - 1. an act done with intent to cause fear in another of immediate bodily harm or death;
  - 2. the intentional infliction of or attempt to inflict bodily harm upon another; or
  - 3. the threat to do bodily harm to another with present ability to carry out the

threat.

- B. "Harassment" prohibited by this policy consists of physical or verbal conduct, including, but not limited to, electronic communications, relating to an individual's or group of individuals' race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability when the conduct:
1. has the purpose or effect of creating an intimidating, hostile, or offensive working or academic environment;
  2. has the purpose or effect of substantially or unreasonably interfering with an individual's work or academic performance; or
  3. otherwise adversely affects an individual's employment or academic opportunities.
- C. "Immediately" means as soon as possible but in no event longer than 24 hours.
- D. Protected Classifications; Definitions
1. "Disability" means any condition or characteristic that renders a person a disabled person. A disabled person is any person who:
    - a. has a physical, sensory, or mental impairment which materially limits one or more major life activities;
    - b. has a record of such an impairment;
    - c. is regarded as having such an impairment; or
    - d. has an impairment that is episodic or in remission and would materially limit a major life activity when active..
  2. "Familial status" means the condition of one or more minors having legal status or custody with:
    - a. their minor's parent or parents or the minor's legal guardian or guardians; or
    - b. the designee of the parent or parents or guardian or guardians with the written permission of the parent or parents or guardian or guardians. Familial status also means residing with and caring for one or more individuals who lack the ability to meet essential requirements for physical health, safety, or self-care because the individual or individuals are unable to receive and evaluate information or make or communicate decisions. The protections afforded against harassment or discrimination on the basis of family status apply to any person who is pregnant or is in the process of securing legal custody of an individual who has not attained the age of majority.
  2. "Familial status" means the condition of one or more minors having legal status or custody with:
    - a. the minor's parent or parents or the minor's legal guardian or guardians; or
    - b. the designee of the parent or parents or guardian or guardians with the written permission of the parent or parents or guardian or

guardians. Familial status also means residing with and caring for one or more individuals who lack the ability to meet essential requirements for physical health, safety, or self-care because the individual or individuals are unable to receive and evaluate information or make or communicate decisions. The protections afforded against harassment on the basis of family status apply to any person who is pregnant or is in the process of securing legal custody of an individual who has not attained the age of majority.

3. "Marital status" means whether a person is single, married, remarried, divorced, separated, or a surviving spouse and, in employment cases, includes protection against harassment on the basis of the identity, situation, actions, or beliefs of a spouse or former spouse.
  4. "National origin" means the place of birth of an individual or of any of the individual's lineal ancestors.
  5. "Sex" includes, but is not limited to, pregnancy, childbirth, and disabilities related to pregnancy or childbirth.
  6. "Sexual orientation" means having or being perceived as having an emotional, physical, or sexual attachment to another person without regard to the sex of that person or having or being perceived as having an orientation for such attachment, or having or being perceived as having a self-image or identity not traditionally associated with one's biological maleness or femaleness. "Sexual orientation" does not include a physical or sexual attachment to children by an adult.
  7. "Status with regard to public assistance" means the condition of being a recipient of federal, state, or local assistance, including medical assistance, or of being a tenant receiving federal, state, or local subsidies, including rental assistance or rent supplements.
- E. "Remedial response" means a measure to stop and correct acts of harassment or violence, prevent acts of harassment or violence from recurring, and protect, support, and intervene on behalf of a student who is the target or victim of acts of harassment or violence.
- F. Sexual Harassment; Definition
1. Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, sexually motivated physical conduct or other verbal or physical conduct or communication of a sexual nature when:
    - a. submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of obtaining employment or an education; or
    - b. submission to or rejection of that conduct or communication by an individual is used as a factor in decisions affecting that individual's employment or education; or
    - c. that conduct or communication has the purpose or effect of substantially or unreasonably interfering with an individual's employment or education, or creating an intimidating, hostile, or offensive employment or educational environment.
  2. Sexual harassment may include, but is not limited to:
    - a. unwelcome verbal harassment or abuse;

- b. unwelcome pressure for sexual activity;
- c. unwelcome, sexually motivated, or inappropriate patting, pinching, or physical contact, other than necessary restraint of student(s) by teachers, administrators, or other school district personnel to avoid physical harm to persons or property;
- d. unwelcome sexual behavior or words, including demands for sexual favors, accompanied by implied or overt threats concerning an individual's employment or educational status;
- e. unwelcome sexual behavior or words, including demands for sexual favors, accompanied by implied or overt promises of preferential treatment with regard to an individual's employment or educational status; or
- f. unwelcome behavior or words directed at an individual because of sexual orientation, including gender identity or expression.

G. Sexual Violence; Definition

- 1. Sexual violence is a physical act of aggression or force or the threat thereof which involves the touching of another's intimate parts or forcing a person to touch any person's intimate parts. Intimate parts, as defined in Minn. Stat. § 609.341, includes the primary genital area, groin, inner thigh, buttocks, or breast, as well as the clothing covering these areas.
- 2. Sexual violence may include, but is not limited to:
  - a. touching, patting, grabbing, or pinching another person's intimate parts, whether that person is of the same sex or the opposite sex;
  - b. coercing, forcing, or attempting to coerce or force the touching of anyone's intimate parts;
  - c. coercing, forcing, or attempting to coerce or force sexual intercourse or a sexual act on another; or
  - d. threatening to force or coerce sexual acts, including the touching of intimate parts or intercourse, on another.

H. Violence; Definition

Violence prohibited by this policy is a physical act of aggression or assault upon another or group of individuals because of, or in a manner reasonably related to, race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability.

**IV. REPORTING PROCEDURES**

- A. Any person who believes he or she has been the target or victim of harassment or violence on the basis of race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, including gender identity or expression, or disability by a student, teacher, administrator, or other school district personnel, or any person with knowledge or belief of conduct which may constitute harassment or violence prohibited by this policy toward a student, teacher, administrator, or other school district personnel or group of students, teachers, administrators, or other school district personnel should report the

alleged acts immediately to an appropriate school district official designated by this policy. A person may report conduct which may constitute harassment or violence anonymously. However, the school district may not rely solely on an anonymous report to determine discipline or other remedial responses.

- B. The school district encourages the reporting party or complainant to use the report form available from the principal or building supervisor of each building or available from the school district office, but oral reports shall be considered complaints as well.
- C. Nothing in this policy shall prevent any person from reporting harassment or violence directly to a school district human rights officer or to the superintendent. If the complaint involves the building report taker, the complaint shall be made or filed directly with the superintendent or the school district human rights officer by the reporting party or complainant.
- D. In Each School Building. The building principal, the principal's designee, or the building supervisor (hereinafter the "building report taker") is the person responsible for receiving oral or written reports of harassment or violence prohibited by this policy at the building level. Any adult school district personnel who receives a report of harassment or violence prohibited by this policy shall inform the building report taker immediately. If the complaint involves the building report taker, the complaint shall be made or filed directly with the superintendent or the school district human rights officer by the reporting party or complainant. The building report taker shall ensure that this policy and its procedures, practices, consequences, and sanctions are fairly and fully implemented and shall serve as a primary contact on policy and procedural matters.
- E. A teacher, school administrator, volunteer, contractor, or other school employee shall be particularly alert to possible situations, circumstances, or events that might include acts of harassment or violence. Any such person who witnesses, observes, receives a report of, or has other knowledge or belief of conduct that may constitute harassment or violence shall make reasonable efforts to address and resolve the harassment or violence and shall inform the building report taker immediately. School district personnel who fail to inform the building report taker of conduct that may constitute harassment or violence or who fail to make reasonable efforts to address and resolve the harassment or violence in a timely manner may be subject to disciplinary action.
- F. Upon receipt of a report, the building report taker must notify the school district human rights officer immediately, without screening or investigating the report. The building report taker may request, but may not insist upon, a written complaint. A written statement of the facts alleged will be forwarded as soon as practicable by the building report taker to the human rights officer. If the report was given verbally, the building report taker shall personally reduce it to written form within 24 hours and forward it to the human rights officer. Failure to forward any harassment or violence report or complaint as provided herein may result in disciplinary action against the building report taker.
- G. In the District. The school board hereby designates [Kari Lauwagie Kelly Jensen](#) as the school district human rights officer(s) to receive reports or complaints of harassment or violence prohibited by this policy. If the complaint involves a human rights officer, the complaint shall be filed directly with the superintendent.<sup>1</sup>
- H. The school district shall conspicuously post the name of the human rights officer(s), including mailing addresses and telephone numbers.
- I. Submission of a good faith complaint or report of harassment or violence prohibited by this policy will not affect the complainant or reporter's future employment, grades, work assignments, or educational or work environment.

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- J. Use of formal reporting forms is not mandatory.
- K. Reports of harassment or violence prohibited by this policy are classified as private educational and/or personnel data and/or confidential investigative data and will not be disclosed except as permitted by law.
- L. The school district will respect the privacy of the complainant(s), the individual(s) against whom the complaint is filed, and the witnesses as much as possible, consistent with the school district's legal obligations to investigate, to take appropriate action, and to comply with any discovery or disclosure obligations.
- M. Retaliation against a victim, good faith reporter, or a witness of violence or harassment is prohibited.
- N. False accusations or reports of violence or harassment against another person are prohibited.
- O. A person who engages in an act of violence or harassment, reprisal, retaliation, or false reporting of violence or harassment, or permits, condones, or tolerates violence or harassment shall be subject to discipline or other remedial responses for that act in accordance with the school district's policies and procedures.

Consequences for students who commit, or are a party to, prohibited acts of violence or harassment or who engage in reprisal or intentional false reporting may range from remedial responses or positive behavioral interventions up to and including suspension and/or expulsion.

Consequences for employees who permit, condone, or tolerate violence or harassment or engage in an act of reprisal or intentional false reporting of violence or harassment may result in disciplinary action up to and including termination or discharge.

Consequences for other individuals engaging in prohibited acts of violence or harassment may include, but not be limited to, exclusion from school district property and events and/or termination of services and/or contracts.

## **V. INVESTIGATION**

- A. By authority of the school district, the human rights officer, within three (3) days of the receipt of a report or complaint alleging harassment or violence prohibited by this policy, shall undertake or authorize an investigation. The investigation may be conducted by school district officials or by a third party designated by the school district.
- B. The investigation may consist of personal interviews with the complainant, the individual(s) against whom the complaint is filed, and others who may have knowledge of the alleged incident(s) or circumstances giving rise to the complaint. The investigation may also consist of any other methods and documents deemed pertinent by the investigator.
- C. In determining whether alleged conduct constitutes a violation of this policy, the school district should consider the surrounding circumstances, the nature of the behavior, past incidents or past or continuing patterns of behavior, the relationships between the parties involved, and the context in which the alleged incidents occurred. Whether a particular action or incident constitutes a violation of this policy requires a determination based on all the facts and surrounding circumstances.
- D. In addition, the school district may take immediate steps, at its discretion, to protect the target or victim, the complainant, and students, teachers, administrators, or other school district personnel pending completion of an investigation of alleged harassment or violence prohibited by this policy.

- E. The alleged perpetrator of the act(s) of harassment or violence shall be allowed the opportunity to present a defense during the investigation or prior to the imposition of discipline or other remedial responses.
- F. The investigation will be completed as soon as practicable. The school district human rights officer shall make a written report to the superintendent upon completion of the investigation. If the complaint involves the superintendent, the report may be filed directly with the school board. The report shall include a determination of whether the allegations have been substantiated as factual and whether they appear to be violations of this policy.

## **VI. SCHOOL DISTRICT ACTION**

- A. Upon completion of an investigation that determines a violation of this policy has occurred, the school district will take appropriate action. Such action may include, but is not limited to, warning, suspension, exclusion, expulsion, transfer, remediation, termination, or discharge. Disciplinary consequences will be sufficiently severe to try to deter violations and to appropriately discipline prohibited behavior. School district action taken for violation of this policy will be consistent with requirements of applicable collective bargaining agreements, Minnesota and federal law, and applicable school district policies and regulations.
- B. The school district is not authorized to disclose to a victim private educational or personnel data regarding an alleged perpetrator who is a student or employee of the school district. School officials will notify the parent(s) or guardian(s) of targets or victims of harassment or violence and the parent(s) or guardian(s) of alleged perpetrators of harassment or violence who have been involved in a reported and confirmed harassment or violence incident of the remedial or disciplinary action taken, to the extent permitted by law.
- C. In order to prevent or respond to acts of harassment or violence committed by or directed against a child with a disability, the school district shall, where determined appropriate by the child's individualized education program (IEP) or Section 504 team, allow the child's IEP or Section 504 plan to be drafted to address the skills and proficiencies the child needs as a result of the child's disability to allow the child to respond to or not to engage in acts of harassment or violence.

## **VII. RETALIATION OR REPRISAL**

The school district will discipline or take appropriate action against any student, teacher, administrator, or other school district personnel who commits an act of reprisal or who retaliates against any person who asserts, alleges, or makes a good faith report of alleged harassment or violence prohibited by this policy, who testifies, assists, or participates in an investigation of retaliation or alleged harassment or violence, or who testifies, assists, or participates in a proceeding or hearing relating to such harassment or violence. Retaliation includes, but is not limited to, any form of intimidation, reprisal, harassment, or intentional disparate treatment. Disciplinary consequences will be sufficiently severe to deter violations and to appropriately discipline the individual(s) who engaged in the harassment or violence. Remedial responses to the harassment or violence shall be tailored to the particular incident and nature of the conduct.

## **VIII. RIGHT TO ALTERNATIVE COMPLAINT PROCEDURES**

These procedures do not deny the right of any individual to pursue other avenues of recourse which may include filing charges with the Minnesota Department of Human Rights, initiating civil action, or seeking redress under state criminal statutes and/or federal law.

## **IX. HARASSMENT OR VIOLENCE AS ABUSE**

- A. Under certain circumstances, alleged harassment or violence may also be possible abuse under Minnesota law. If so, the duties of mandatory reporting under Minn. Stat. § 626.556 may be applicable.
- B. Nothing in this policy will prohibit the school district from taking immediate action to protect victims of alleged harassment, violence, or abuse.

**X. DISSEMINATION OF POLICY AND TRAINING**

- A. This policy shall be conspicuously posted throughout each school building in areas accessible to students and staff members.
- B. This policy shall be given to each school district employee and independent contractor who regularly interacts with students at the time of initial employment with the school district.
- C. This policy shall appear in the student handbook.
- D. The school district will develop a method of discussing this policy with students and employees.
- E. The school district may implement violence prevention and character development education programs to prevent and reduce policy violations. Such programs may offer instruction on character education including, but not limited to, character qualities such as attentiveness, truthfulness, respect for authority, diligence, gratefulness, self-discipline, patience, forgiveness, respect for others, peacemaking, resourcefulness, and/or sexual abuse prevention.
- F. This policy shall be reviewed at least annually for compliance with state and federal law.

**Legal References:** Minn. Stat. § 120B.232 (Character Development Education)  
Minn. Stat. § 120B.234 (Child Sexual Abuse Prevention Education)  
Minn. Stat. § 121A.03, Subd. 2 (Sexual, Religious, and Racial Harassment and Violence Policy)  
Minn. Stat. § 121A.031 (School Student Bullying Policy)  
Minn. Stat. Ch. 363A (Minnesota Human Rights Act)  
Minn. Stat. § 609.341 (Definitions)  
Minn. Stat. § 626.556 *et seq.* (Reporting of Maltreatment of Minors)  
20 U.S.C. §§ 1681-1688 (Title IX of the Education Amendments of 1972)  
29 U.S.C. § 621 *et seq.* (Age Discrimination in Employment Act)  
29 U.S.C. § 794 (Rehabilitation Act of 1973, § 504)  
42 U.S.C. § 1983 (Civil Action for Deprivation of Rights)  
42 U.S.C. § 2000d *et seq.* (Title VI of the Civil Rights Act of 1964)  
42 U.S.C. § 2000e *et seq.* (Title VII of the Civil Rights Act)  
42 U.S.C. § 12101 *et seq.* (Americans with Disabilities Act)

**Cross References:** Policy 102 (Equal Educational Opportunity)  
Policy 401 (Equal Employment Opportunity)  
Policy 402 (Disability Nondiscrimination Policy)  
Policy 403 (Discipline, Suspension, and Dismissal of School District Employees)  
Policy 406 (Public and Private Personnel Data)  
Policy 414 (Mandated Reporting of Child Neglect or Physical or Sexual Abuse)  
Policy 415 (Mandated Reporting of Maltreatment of Vulnerable Adults)  
Policy 506 (Student Discipline)  
Policy 514 (Bullying Prohibition Policy)  
Policy 515 (Protection and Privacy of Pupil Records)

Policy 521 (Student Disability Nondiscrimination)  
Policy 522 (Student Sex Nondiscrimination)  
Policy 524 (Internet Acceptable Use and Safety Policy)  
Policy 525 (Violence Prevention)  
Policy 526 (Hazing Prohibition)  
Policy 528 (Student Parental, Family, and Marital Status Nondiscrimination)

## **521 STUDENT DISABILITY NONDISCRIMINATION**

### **I. PURPOSE**

The purpose of this policy is to protect disabled students from discrimination on the basis of disability and to identify and evaluate learners who, within the intent of Section 504 of the Rehabilitation Act of 1973 (Section 504), need services, accommodations, or programs in order that such learners may receive a free appropriate public education.

### **II. GENERAL STATEMENT OF POLICY**

- A. Disabled students who meet the criteria of Paragraph C. below are protected from discrimination on the basis of a disability.
- B. The responsibility of the school district is to identify and evaluate learners who, within the intent of Section 504, need services, accommodations, or programs in order that such learners may receive a free appropriate public education.
- C. For this policy, a learner who is protected under Section 504 is one who:
  - 1. has a physical or mental impairment that substantially limits one or more of such person's major life activities; or
  - 2. has a record of such an impairment;
  - 3. is regarded as having such an impairment; or
  - 4. has an impairment that is episodic or in remission and would materially limit a major life activity when active.
- D. Learners may be protected from disability discrimination and be eligible for services, accommodations, or programs under the provisions of Section 504 even though they are not eligible for special education pursuant to the Individuals with Disabilities Education Act.

### **III. COORDINATOR**

Persons who have questions or comments should contact [Karie Lauwagie-Kelly Jensen](mailto:klauwagiejensen@stpetersschools.org), 504 Coordinator, [100 Lincoln Drive 2121 W. Broadway](https://www.google.com/maps/place/100+Lincoln+Drive+2121+W.+Broadway,+Saint+Peter,+MN+56082/@45.7111111,-92.9166667,15z), Saint Peter, MN 56082, 507-934-~~42104212~~  
~~ext. 6105~~,  
[klauwagiejensen@stpetersschools.org](mailto:klauwagiejensen@stpetersschools.org)

This person is the school district's Americans with Disabilities Act/Section 504 coordinator. Persons who wish to make a complaint regarding a disability discrimination matter may use the accompanying Student Disability Discrimination Grievance Report Form. The form should be given to the ADA/Section 504 coordinator.

**Legal References:** Minn. Stat. § 363A.03, Subd. 12 (Definitions)  
Pub. L. 110-325, 122 Stat. 3553 (ADA Amendments Act of 2008, § 7)  
29 U.S.C. § 794 *et seq.* (Rehabilitation Act of 1973, § 504)  
34 C.F.R. Part 104 (Section 504 Implementing Regulations)

**Cross References:** Policy 402 (Disability Nondiscrimination)

## **722 PUBLIC DATA AND DATA SUBJECT REQUESTS**

### **I. PURPOSE**

The school district recognizes its responsibility relative to the collection, maintenance, and dissemination of public data as provided in state statutes.

### **II. GENERAL STATEMENT OF POLICY**

The school district will comply with the requirements of the Minnesota Government Data Practices Act, Minn. Stat. Ch. 13 (MGDPA), and Minn. Rules Parts 1205.0100-1205.2000 in responding to requests for public data.

### **III. DEFINITIONS**

#### **A. Confidential Data on Individuals**

Data made not public by statute or federal law applicable to the data and are inaccessible to the individual subject of those data.

#### **B. Data on Individuals**

All government data in which any individual is or can be identified as the subject of that data, unless the appearance of the name or other identifying data can be clearly demonstrated to be only incidental to the data and the data are not accessed by the name or other identifying data of any individual.

#### **C. Data Practices Compliance Officer**

The data practices compliance official is the designated employee of the school district to whom persons may direct questions or concerns regarding problems in obtaining access to data or other data practices problems. The responsible authority may be the data practices compliance official.

#### **D. Government Data**

All data collected, created, received, maintained or disseminated by any government entity regardless of its physical form, storage media or conditions of use.

#### **E. Individual**

"Individual" means a natural person. In the case of a minor or an incapacitated person as defined in Minnesota Statutes section 524.5-102, subdivision 6, "individual" includes a parent or guardian or an individual acting as a parent or guardian in the absence of a parent or guardian, except that the responsible authority shall withhold data from parents or guardians, or individuals acting as parents or guardians in the absence of parents or guardians, upon request by the minor if the responsible authority determines that withholding the data would be in the best interest of the minor.

#### **F. Inspection**

"Inspection" means the visual inspection of paper and similar types of government data. Inspection does not include printing copies by the school district, unless printing a copy is the only method to provide for inspection of the data. For data stored in electronic form and made available in electronic form on a remote access basis to the public by

the school district, inspection includes remote access to the data by the public and the ability to print copies of or download the data on the public's own computer equipment.

G. Not Public Data

Any government data classified by statute, federal law, or temporary classification as confidential, private, nonpublic, or protected nonpublic.

H. Nonpublic Data

Data not on individuals made by statute or federal law applicable to the data: (a) not accessible to the public; and (b) accessible to the subject, if any, of the data.

I. Private Data on Individuals

Data made by statute or federal law applicable to the data: (a) not public; and (b) accessible to the individual subject of those data.

J. Protected Nonpublic Data

Data not on individuals made by statute or federal law applicable to the data (a) not public and (b) not accessible to the subject of the data.

K. Public Data

All government data collected, created, received, maintained, or disseminated by the school district, unless classified by statute, temporary classification pursuant to statute, or federal law, as nonpublic or protected nonpublic; or, with respect to data on individuals, as private or confidential.

L. Public Data Not on Individuals

Data accessible to the public pursuant to Minnesota Statutes section 13.03.

M. Public Data on Individuals

Data accessible to the public in accordance with the provisions of section 13.03.

N. Responsible Authority

The individual designated by the school board as the individual responsible for the collection, use, and dissemination of any set of data on individuals, government data, or summary data, unless otherwise provided by state law. Until an individual is designated by the school board, the responsible authority is the superintendent.

O. Summary Data

Statistical records and reports derived from data on individuals but in which individuals are not identified and from which neither their identities nor any other characteristic that could uniquely identify an individual is ascertainable. Unless classified pursuant to Minnesota Statutes section 13.06, another statute, or federal law, summary data is public.

#### **IV. REQUESTS FOR PUBLIC DATA**

A. All requests for public data must be made in writing directed to the responsible authority.

1. A request for public data must include the following information:

- a. Date the request is made;
  - b. A clear description of the data requested;
  - c. Identification of the form in which the data is to be provided (e.g., inspection, copying, both inspection and copying, etc.); and
  - d. Method to contact the requestor (such as phone number, address, or email address).
2. Unless specifically authorized by statute, the school district may not require persons to identify themselves, state a reason for, or justify a request to gain access to public government data. A person may be asked to provide certain identifying or clarifying information for the sole purpose of facilitating access to the data.
  3. The identity of the requestor is public, if provided, but cannot be required by the government entity.
  4. The responsible authority may seek clarification from the requestor if the request is not clear before providing a response to the data request.
- B. The responsible authority will respond to a data request at reasonable times and places as follows:
1. The responsible authority will notify the requestor in writing as follows:
    - a. The requested data does not exist; or
    - b. The requested data does exist but either all or a portion of the data is not accessible to the requestor; or
      - (1) If the responsible authority determines that the requested data is classified so that access to the requestor is denied, the responsible authority will inform the requestor of the determination in writing, as soon thereafter as possible, and shall cite the specific statutory section, temporary classification, or specific provision of federal law on which the determination is based.
      - (2) Upon the request of a requestor who is denied access to data, the responsible authority shall certify in writing that the request has been denied and cite the specific statutory section, temporary classification, or specific provision of federal law upon which the denial was based.
    - c. The requested data does exist and provide arrangements for inspection of the data, identify when the data will be available for pick-up, or indicate that the data will be sent by mail. If the requestor does not appear at the time and place established for inspection of the data or the data is not picked up within ten (10) business days after the requestor is notified, the school district will conclude that the data is no longer wanted and will consider the request closed.
  2. The school district's response time may be affected by the size and complexity of the particular request, including necessary redactions of the data, and also by the number of requests made within a particular period of time.
  3. The school district will provide an explanation of technical terminology, abbreviations, or acronyms contained in the responsive data on request.

4. The school district is not required by the MGDPA to create or collect new data in response to a data request, or to provide responsive data in a specific form or arrangement if the school district does not keep the data in that form or arrangement.
5. The school district is not required to respond to questions that are not about a particular data request or requests for data in general.

#### **V. REQUEST FOR SUMMARY DATA**

- A. A request for the preparation of summary data shall be made in writing directed to the responsible authority.
  1. A request for the preparation of summary data must include the following information:
    - a. Date the request is made;
    - b. A clear description of the data requested;
    - c. Identify the form in which the data is to be provided (e.g., inspection, copying, both inspection and copying, etc.); and
    - d. Method to contact requestor (phone number, address, or email address).
- B. The responsible authority will respond within ten (10) business days of the receipt of a request to prepare summary data and inform the requestor of the following:
  1. The estimated costs of preparing the summary data, if any; and
  2. The summary data requested; or
  3. A written statement describing a time schedule for preparing the requested summary data, including reasons for any time delays; or
  4. A written statement describing the reasons why the responsible authority has determined that the requestor's access would compromise the private or confidential data.
- C. The school district may require the requestor to pre-pay all or a portion of the cost of creating the summary data before the school district begins to prepare the summary data.

#### **VI. DATA BY AN INDIVIDUAL DATA SUBJECT**

- A. Collection and storage of all data on individuals and the use and dissemination of private and confidential data on individuals shall be limited to that necessary for the administration and management of programs specifically authorized by the legislature or local governing body or mandated by the federal government.
- B. Private or confidential data on an individual shall not be collected, stored, used, or disseminated by the school district for any purposes other than those stated to the individual at the time of collection in accordance with Minnesota Statutes section 13.04, except as provided in Minnesota Statutes section 13.05, subdivision 4.
- C. Upon request to the responsible authority or designee, an individual shall be informed whether the individual is the subject of stored data on individuals, and whether it is classified as public, private or confidential. Upon further request, an individual who is the subject of stored private or public data on individuals shall be shown the data without any charge and, if desired, shall be informed of the content and meaning of that data.

- D. After an individual has been shown the private data and informed of its meaning, the data need not be disclosed to that individual for six months thereafter unless a dispute or action pursuant to this section is pending or additional data on the individual has been collected or created.
- E. The responsible authority or designee shall provide copies of the private or public data upon request by the individual subject of the data. The responsible authority or designee may require the requesting person to pay the actual costs of making and certifying the copies.
- F. The responsible authority or designee shall comply immediately, if possible, with any request made pursuant to this subdivision, or within ten days of the date of the request, excluding Saturdays, Sundays and legal holidays, if immediate compliance is not possible.
- G. An individual subject of the data may contest the accuracy or completeness of public or private data. To exercise this right, an individual shall notify in writing the responsible authority describing the nature of the disagreement. The responsible authority shall within 30 days either: (1) correct the data found to be inaccurate or incomplete and attempt to notify past recipients of inaccurate or incomplete data, including recipients named by the individual; or (2) notify the individual that the authority believes the data to be correct. Data in dispute shall be disclosed only if the individual's statement of disagreement is included with the disclosed data.
- H. The determination of the responsible authority may be appealed pursuant to the provisions of the Administrative Procedure Act relating to contested cases. Upon receipt of an appeal by an individual, the commissioner shall, before issuing the order and notice of a contested case hearing required by Minnesota Statutes chapter 14, try to resolve the dispute through education, conference, conciliation, or persuasion. If the parties consent, the commissioner may refer the matter to mediation. Following these efforts, the commissioner shall dismiss the appeal or issue the order and notice of hearing.
- I. Data on individuals that have been successfully challenged by an individual must be completed, corrected, or destroyed by a government entity without regard to the requirements of Minnesota Statutes section 138.17.
- J. After completing, correcting, or destroying successfully challenged data, the school district may retain a copy of the commissioner of administration's order issued under Minnesota Statutes chapter 14 or, if no order were issued, a summary of the dispute between the parties that does not contain any particulars of the successfully challenged data.

**VII. REQUESTS FOR DATA BY AN INDIVIDUAL SUBJECT OF THE DATA**

- A. All requests for individual subject data must be made in writing directed to the responsible authority.
- B. A request for individual subject data must include the following information:
  - 1. Statement that one is making a request as a data subject for data about the individual or about a student for whom the individual is the parent or guardian;
  - 2. Date the request is made;
  - 3. A clear description of the data requested;
  - 4. Proof that the individual is the data subject or the data subject's parent or guardian;
  - 5. Identification of the form in which the data is to be provided (e.g., inspection, copying, both inspection and copying, etc.); and

6. Method to contact the requestor (such as phone number, address, or email address).
- C. The identity of the requestor of private data is private.
- D. The responsible authority may seek clarification from the requestor if the request is not clear before providing a response to the data request.
- E. Policy 515 (Protection and Privacy of Pupil Records) addresses requests of students or their parents for educational records and data.

## **VIII. COSTS**

### **A. Public Data**

1. The school district will charge for copies provided as follows:
  - a. 100 or fewer pages of black and white, letter or legal sized paper copies will be charged at 25 cents for a one-sided copy or 50 cents for a two-sided copy.
  - b. More than 100 pages or copies on other materials are charged based upon the actual cost of searching for and retrieving the data and making the copies or electronically sending the data, unless the cost is specifically set by statute or rule.
    - (1) The actual cost of making copies includes employee time, the cost of the materials onto which the data is copied (paper, CD, DVD, etc.), and mailing costs (if any).
    - (2) Also, if the school district does not have the capacity to make the copies, e.g., photographs, the actual cost paid by the school district to an outside vendor will be charged.
2. All charges must be paid for in cash in advance of receiving the copies.

### **B. Summary Data**

1. Any costs incurred in the preparation of summary data shall be paid by the requestor prior to preparing or supplying the summary data.
2. The school district may assess costs associated with the preparation of summary data as follows:
  - a. The cost of materials, including paper, the cost of the labor required to prepare the copies, any schedule of standard copying charges established by the school district, any special costs necessary to produce such copies from a machine-based record-keeping system, including computers and microfilm systems;
  - b. The school district may consider the reasonable value of the summary data prepared and, where appropriate, reduce the costs assessed to the requestor.

### **C. Data Belonging to an Individual Subject**

1. The responsible authority or designee may require the requesting person to pay the actual costs of making and certifying the copies.

The responsible authority shall not charge the data subject any fee in those instances where the data subject only desires to view private data.

The responsible authority or designee may require the requesting person to pay the actual costs of making and certifying the copies. Based on the factors set forth in Minnesota Rule 1205.0300, subpart 4, the school district determines that a reasonable fee would be the charges set forth in section VIII.A of this policy that apply to requests for data by the public.

2. The school district may not charge a fee to search for or to retrieve educational records of a child with a disability by the child's parent or guardian or by the child upon the child reaching the age of majority.

### **Data Practices Contacts**

#### **Responsible Authority:**

Superintendent [GraffOlson](#)  
100 Lincoln Drive, Saint Peter, MN 56082  
507-934-5703  
[jgraffjelson@stpetersschools.org](mailto:jgraffjelson@stpetersschools.org)

#### **Data Practices Compliance Official:**

Data Practices Compliance Official:  
Superintendent [GraffOlson](#)  
100 Lincoln Drive, Saint Peter, MN 56082  
507-934-5703

#### **Data Practices Designee(s):**

Data Practices Designee:  
Kimberley Deming  
100 Lincoln Drive, Saint Peter, MN 56082  
507-934-5703  
[kdeming2@stpetersschools.org](mailto:kdeming2@stpetersschools.org)

#### **Legal References:**

Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act)  
Minn. Stat. § 13.01 (Government Data)  
Minn. Stat. § 13.02 (Definitions)  
Minn. Stat. § 13.025 (Government Entity Obligation)  
Minn. Stat. § 13.03 (Access to Government Data)  
Minn. Stat. § 13.04 (Rights of Subjects to Data)  
Minn. Stat. § 13.05 (Duties of Responsible Authority)  
Minn. Stat. § 13.32 (Educational Data)  
Minn. Rules Part 1205.0300 (Access to Public Data)  
Minn. Rules Part 1205.0400 (Access to Private Data)

#### **Cross References:**

Policy 406 (Public and Private Personnel Data)  
Policy 515 (Protection and Privacy of Pupil Records)



## ADDENDUM

### Regular Board Meeting Wednesday, September 17, 2025 SPCC-Governor's Room 5:00PM

#### VII. ACTION ITEMS

##### 6. AGENDA ITEM #6

**Subject:** Consider Policies for Approval with a Second Reading

**Action:** Requires a Motion

**Background:** The following policies are being brought forward for a second and final reading:

**Policy 806** - Crisis Management Policy

- The MSBA Model Policy is substantially different than SPPS's current policy. Emergency Action Plan updates, however, have been designed around MSBA's model policy in preparation for a likely adoption.

**Policy 515** - Protection and Privacy of Pupil Records

- Recent legislative changes clarify what is allowed as directory information in Minnesota. MSBA Model Policy suggests districts spell out their definition of directory information. The first reading draft included the following definition: *"Directory information" means information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed. It includes the student's name, dates of attendance, grade level, enrollment status (i.e., full-time or part-time); participation in officially recognized activities and sports; weight and height of members of athletic teams; and honors and awards received.*

These policies were reviewed by the Policy Committee at their September 10th meeting and the committee recommends their approval.

**Presentation:** Superintendent of Schools, Jon Graff  
Policy Review Committee

**Options/Recommendation:** I recommend your approval of Policies 806 and 515.

## 806 CRISIS MANAGEMENT POLICY

**[NOTE: The Commissioner of the Minnesota Department of Education (Commissioner) is required to maintain and make available to school boards and charter schools a Model Crisis Management Policy. See Minnesota Statutes, section 121A.035. School boards and charter schools must adopt a Crisis Management Policy to address potential crisis situations in their school districts or charter schools. Id. This Model Crisis Management Policy was originally the result of a collaborative effort among the Minnesota Department of Education, Division of Compliance and Assistance; the Minnesota Department of Public Safety, Division of Homeland Security and Emergency Management; and the Minnesota School Boards Association.]**

### I. PURPOSE

The purpose of this Model Crisis Management Policy is to act as a guide for school district and building administrators, school employees, students, school board members, and community members to address a wide range of potential crisis situations in the school district. The step-by-step procedures suggested by this Policy will provide guidance to each school building in drafting crisis management plans to coordinate protective actions prior to, during, and after any type of emergency or potential crisis situation. Each school district should develop tailored building-specific crisis management plans for each school building in the school district, and sections or procedures may be added or deleted in those crisis management plans based on building needs.

The school district will, to the extent possible, engage in ongoing emergency planning within the school district and with emergency responders and other relevant community organizations. The school district will ensure that relevant emergency responders in the community have access to their building-specific crisis management plans and will provide training to school district staff to enable them to act appropriately in the event of a crisis.

### II. GENERAL INFORMATION

#### A. The Policy and Plans

The school district's Crisis Management Policy has been created in consultation with local community response agencies and other appropriate individuals and groups that would likely be involved in the event of a school emergency. It is designed so that each building administrator can tailor a building-specific crisis management plan to meet that building's specific situation and needs.

The school district's administration and/or the administration of each building shall present tailored building-specific crisis management plans to the school board for review and approval. The building-specific crisis management plans will include general crisis procedures and crisis-specific procedures. Upon approval by the school board, such crisis management plans shall be an addendum to this Crisis Management Policy. This Policy and the plans will be maintained and updated on an annual basis.

#### B. Elements of the District Crisis Management Policy

##### 1. General Crisis Procedures

The Crisis Management Policy includes general crisis procedures for securing buildings, classroom evacuation, building evacuation, campus evacuation, and sheltering. The Policy designates the individual(s) who will determine when these actions will be taken. These district-wide procedures may be modified by

building administrators when creating their building-specific crisis management plans. A communication system will be in place to enable the designated individual to be contacted at all times in the event of a potential crisis, setting forth the method to contact the designated individual, the provision of at least two designees when the contact person is unavailable, and the method to convey contact information to the appropriate staff persons. The alternative designees may include members of the emergency first responder response team. A secondary method of communication should be included in the plan for use when the primary method of communication is inoperable. Each building in the school district will have access to a copy of the Comprehensive School Safety Guide (2011 Edition) to assist in the development of building-specific crisis management plans.

All general crisis procedures will address specific procedures for the safe evacuation of children and employees with special needs such as physical, sensory, motor, developmental, and mental health challenges.

~~**[NOTE: More specific information on planning for children with special needs can be found in the Comprehensive School Safety Guide (2011 Edition) and United States Department of Education's document entitled, "Practical Information on Crisis Planning, a Guide for Schools and Communities." A website link is provided in the resource section of this Policy.]**~~

a. Lock-Down Procedures

Lock-down procedures will be used in situations where harm may result to persons inside the school building, such as a shooting, hostage incident, intruder, trespass, disturbance, or when determined to be necessary by the building administrator or his or her designee. The building administrator or designee will announce the lock-down over the public address system or other designated system. Code words will not be used. Provisions for emergency evacuation will be maintained even in the event of a lock-down. Each building administrator will submit lock-down procedures for their building as part of the building-specific crisis management plan.

**[NOTE: Minnesota law requires a minimum of five school lock-down drills each school year. See Minnesota Statutes, section 121A.035.]**

b. Evacuation Procedures

Evacuations of classrooms and buildings shall be implemented at the discretion of the building administrator or his or her designee. Each building's crisis management plan will include procedures for transporting students and staff a safe distance from harm to a designated safe area until released by the building administrator or designee. Safe areas may change based upon the specific emergency situation. The evacuation procedures should include specific procedures for children with special needs, including children with limited mobility (wheelchairs, braces, crutches, etc.), visual impairments, hearing impairments, and other sensory, developmental, or mental health needs. The evacuation procedures should also address transporting necessary medications for students that take medications during the school day.

**[NOTE: Minnesota law requires a minimum of five school fire drills, consistent with Minnesota Statutes, section 299F.30, and one school tornado drill each school year. See Minnesota**

**Statutes, section 121A.035.]**

c. Sheltering Procedures

Sheltering provides refuge for students, staff, and visitors within the school building during an emergency. Shelters are safe areas that maximize the safety of inhabitants. Safe areas may change based upon the specific emergency. The building administrator or his or her designee will announce the need for sheltering over the public address system or other designated system. Each building administrator will submit sheltering procedures for his or her building as part of the building-specific crisis management plan.

~~**5[NOTE: The Comprehensive School Safety Guide (2011 Edition) has sample lock-down procedures, evacuation procedures, and sheltering procedures.]**~~

2. Crisis-Specific Procedures

The Crisis Management Policy includes crisis-specific procedures for crisis situations that may occur during the school day or at school-sponsored events and functions. These district-wide procedures are designed to enable building administrators to tailor response procedures when creating building-specific crisis management plans.

~~**[NOTE: The Comprehensive School Safety Guide (2011 Edition) includes crisis-specific procedures.]**~~

~~**[NOTE: The 2024 Minnesota legislature enacted permissive language stating that a school board “may adopt the model cardiac emergency response plan provided by” the Commissioner (as of June 4, 2024, a response plan is not yet available.)**~~

3. School Emergency Response Teams

a. Composition

The building administrator in each school building will select a school emergency response team that will be trained to respond to emergency situations. All school emergency response team members will receive on-going training to carry out the building’s crisis management plans and will have knowledge of procedures, evacuation routes, and safe areas. For purposes of student safety and accountability, to the extent possible, school emergency response team members will not have direct responsibility for the supervision of students. Team members must be willing to be actively involved in the resolution of crises and be available to assist in any crisis situation as deemed necessary by the building administrator. Each building will maintain a current list of school emergency response team members which will be updated annually. The building administrator, and his or her alternative designees, will know the location of that list in the event of a school emergency. A copy of the list will be kept on file in the school district office, or in a secondary location in single building school districts.

~~**[NOTE: The Comprehensive School Safety Guide (2011 Edition) has a sample School Emergency Response Team list.]**~~

b. Leaders

The building administrator or his or her designee will serve as the leader

of the school emergency response team and will be the primary contact for emergency response officials. In the event the primary designee is unavailable, the designee list should include more than one alternative designee and may include members of the emergency response team. When emergency response officials are present, they may elect to take command and control of the crisis. It is critical in this situation that school officials assume a resource role and be available as necessary to emergency response officials.

### III. PREPARATION BEFORE AN EMERGENCY

#### A. Communication

##### 1. District Employees

Teachers generally have the most direct contact with students on a day-to-day basis. As a result, they must be aware of their role in responding to crisis situations. This also applies to non-teaching school personnel who have direct contact with students. All staff shall be aware of the school district's Crisis Management Policy and their own building's crisis management plan. Each school's building-specific crisis management plan shall include the method and dates of dissemination of the plan to its staff. Employees will receive a copy of the relevant building-specific crisis management plans and shall receive periodic training on plan implementation.

##### 2. Students and Parents

Students and parents shall be made aware of the school district's Crisis Management Policy and relevant tailored crisis management plans for each school building. Each school district's building-specific crisis management plan shall set forth how students and parents are made aware of the district and school-specific plans. Students shall receive specific instruction on plan implementation and shall participate in a required number of drills and practice sessions throughout the school year.

#### B. Planning and Preparing for Fire

1. Designate a safe area at least 50 feet away from the building to enable students and staff to evacuate. The safe area should not interfere with emergency responders or responding vehicles and should not be in an area where evacuated persons are exposed to any products of combustion. (Depending on the wind direction, where the building on fire is located, the direction from which the fire is arriving, and the location of fire equipment, the distance may need to be extended.)

**[NOTE: Evacuation areas at least 50 feet from school buildings are recommended but not mandated by statute or rule. Evacuation areas should be selected based on safety and the individual school site's proximity to streets, traffic patterns, and other hazards.]**

2. Each building's facility diagram and site plan shall be available in appropriate areas of the building and shall identify the most direct evacuation routes to the designated safe areas both inside and outside of the building. The facility diagram and site plan must identify the location of the fire alarm control panel, fire alarms, fire extinguishers, hoses, water spigots, and utility shut offs.
3. Teachers and staff will receive training on the location of the primary emergency evacuation routes and alternate routes from various points in the building. During fire drills, students and staff will practice evacuations using primary evacuation routes and alternate routes.

4. Certain employees, such as those who work in hazardous areas in the building, will receive training on the locations and proper use of fire extinguishers and protective clothing and equipment.
5. Fire drills will be conducted periodically without warning at various times of the day and under different circumstances, e.g., lunchtime, recess, and during assemblies. State law requires a minimum of five fire drills each school year, consistent with Minnesota Statutes, section 299F.30. See Minnesota Statutes, section 121A.035.

**[NOTE: The State Fire Marshal advises schools to defer fire drills during the winter months.]**

6. A record of fire drills conducted at the building will be maintained in the building administrator's office.

~~**[NOTE: The Comprehensive School Safety Guide (2011 Edition), under the Preparedness/Planning section, has a sample fire drills schedule and log.]**~~

7. The school district will have prearranged sites for emergency sheltering and transportation as needed.
8. The school district will determine which staff will remain in the building to perform essential functions if safe to do so (e.g., switchboard, building engineer, etc.). The school district also will designate an administrator or his or her designee to meet local fire or law enforcement agents upon their arrival.

~~**[NOTE: The Comprehensive School Safety Guide (2011 Edition), under the Response section, has a sample fire procedure form, evacuation/relocation and student reunification/release procedures, and planning for student reunification.]**~~

C. Facility Diagrams and Site Plans

All school buildings will have a facility diagram and site plan that includes the location of primary and secondary evacuation routes, exits, designated safe areas inside and outside of the building, and the location of fire alarm control panel, fire alarms, fire extinguishers, hoses, water spigots, and utility shut offs. All facility diagrams and site plans will be updated regularly and whenever a major change is made to a building. Facility diagrams and site plans will be maintained by the building administrator and will be easily accessible and on file in the school district office. Facility diagrams and site plans will be provided to first responders, such as fire and law enforcement personnel.

~~**[NOTE: For single building school districts, such as charter schools, a secondary location for the diagrams and site plans will be included in the district's Crisis Management Policy and may include filing documents with a charter school sponsor, or compiling facility diagrams and site plans and distributing copies to first responders or sharing the documents with first responders during the crisis planning process.]**~~

**[NOTE: To the extent data contained in facility diagrams and site plans constitute security information pursuant to Minnesota Statutes, section 13.37, school districts are advised to consult with appropriate officials and/or legal counsel prior to dissemination of the facility diagrams or site plans to anyone other than first responders.]**

D. Emergency Telephone Numbers

Each building will maintain a current list of emergency telephone numbers and the names and addresses of local, county, and state personnel who may be involved in a crisis situation. The list will include telephone numbers for local police, fire, ambulance, hospital, the Poison Control Center, county and state emergency management agencies, local public works departments, local utility companies, the public health nurse, mental health/suicide hotlines, and the county welfare agency. A copy of this list will be kept on file in the school district office, or at a secondary location for single building school districts and will be updated annually.

School district employees will receive training on how to make emergency contacts, including 911 calls, when the school district's main telephone number and location is electronically conveyed to emergency personnel instead of the specific building in need of emergency services.

School district plans will set forth a process to internally communicate an emergency, using telephones in classrooms, intercom systems, or two-way radios, as well as the procedure to enable the staff to rapidly convey emergency information to a building designee. Each plan will identify a primary and secondary method of communication for both internal and secondary use. It is recommended that the plan include several methods of communication because computers, intercoms, telephones, and cell phones may not be operational or may be dangerous to use during an emergency.

**~~[NOTE: The Comprehensive School Safety Guide (2011 Edition), under the Preparedness/Planning section, has a sample Emergency Phone Numbers list.]~~**

E. Warning and Notification Systems

The school district shall maintain a warning system designed to inform students, staff, and visitors of a crisis or emergency. This system shall be maintained on a regular basis under the maintenance plan for all school buildings. The school district should consider an alternate notification system to address the needs of staff and students with special needs, such as vision or hearing.

The building administrator shall be responsible for informing students and employees of the warning system and the means by which the system is used to identify a specific crisis or emergency situation. Each school's building-specific crisis management plan will include the method and frequency of dissemination of the warning system information to students and employees.

F. Early School Closure Procedures

The superintendent will make decisions about closing school or buildings as early in the day as possible. The early school closure procedures will set forth the criteria for early school closure (e.g., weather-related, utility failure, or a crisis situation), will specify how closure decisions will be communicated to staff, students, families, and the school community (designated broadcast media, local authorities, e-mail, or district or school building web sites), and will discuss the factors to be considered in closing and reopening a school or building.

Early school closure procedures also will include a reminder to parents and guardians to listen to designated local radio and TV stations for school closing announcements, where possible.

**~~[NOTE: The Comprehensive School Safety Guide (2011 Edition), under the Response section, provides universal procedures for severe weather shelter.]~~**

G. Media Procedures

The superintendent has the authority and discretion to notify parents or guardians and the school community in the event of a crisis or early school closure. The superintendent

will designate a spokesperson who will notify the media in the event of a crisis or early school closure. The spokesperson shall receive training to ensure that the district is in strict compliance with federal and state law relative to the release of private data when conveying information to the media.

~~**[NOTE: The Comprehensive School Safety Guide (2011 Edition), under the Response section, has a sample Media Procedures form.]**~~

H. Behavioral Health Crisis Intervention Procedures

Short-term behavioral health crisis intervention procedures will set forth the procedure for initiating behavioral health crisis intervention plans. The procedures will utilize available resources including the school psychologist, counselor, community behavioral health crisis intervention, or others in the community. Counseling procedures will be used whenever the superintendent or the building administrator determines it to be necessary, such as after an assault, a hostage situation, shooting, or suicide. The behavioral health crisis intervention procedures shall include the following steps:

1. Administrator will meet with relevant persons, including school psychologists and counselors, to determine the level of intervention needed for students and staff.
2. Designate specific rooms as private counseling areas.
3. Escort siblings and close friends of any victims as well as others in need of emotional support to the counseling areas.
4. Prohibit media from interviewing or questioning students or staff.
5. Provide follow-up services to students and staff who receive counseling.
6. Resume normal school routines as soon as possible.

I. Long-Term Recovery Intervention Procedures

Long-term recovery intervention procedures may involve both short-term and long-term recovery planning:

1. Physical/structural recovery.
2. Fiscal recovery.
3. Academic recovery.
4. Social/emotional recovery.

~~**[NOTE: The Comprehensive School Safety Guide (2011 Edition), under the Recovery section, addresses the recovery components in more detail.]**~~

**IV. ACTIVE SHOOTER DRILL**

A. Definitions

1. "Active shooter drill" means an emergency preparedness drill designed to teach students, teachers, school personnel, and staff how to respond in the event of an armed intruder on campus or an armed assailant in the immediate vicinity of the school. An active shooter drill is not an active shooter simulation, nor may an active shooter drill include any sensorial components, activities, or elements which mimic a real life shooting.

2. "Active shooter simulation" means an emergency exercise including full-scale or functional exercises, designed to teach adult school personnel and staff how to respond in the event of an armed intruder on campus or an armed assailant in the immediate vicinity of the school which also incorporates sensorial components, activities, or elements mimicking a real life shooting. Activities or elements mimicking a real life shooting include, but are not limited to, simulation of tactical response by law enforcement. An active shooter simulation is not an active shooter drill.
3. "Evidence-based" means a program or practice that demonstrates any of the following:
  - a. a statistically significant effect on relevant outcomes based on any of the following:
    - i. strong evidence from one or more well designed and well implemented experimental studies;
    - ii. moderate evidence from one or more well designed and well implemented quasi-experimental studies; or
    - iii. promising evidence from one or more well designed and well implemented correlational studies with statistical controls for selection bias.
  - b. a rationale based on high-quality research findings or positive evaluations that the program or practice is likely to improve relevant outcomes, including the ongoing efforts to examine the effects of the program or practice.
4. "Full-scale exercise" means an operations-based exercise that is typically the most complex and resource-intensive of the exercise types and often involves multiple agencies, jurisdictions, organizations, and real-time movement of resources.
5. "Functional exercises" means an operations-based exercise designed to assess and evaluate capabilities and functions while in a realistic, real-time environment, however, movement of resources is usually simulated.

**B. Criteria**

An active shooter drill conducted according to Minnesota Statutes, section 121A.037 with students in early childhood through grade 12 must be:

1. accessible;
2. developmentally appropriate and age appropriate, including using appropriate safety language and vocabulary;
3. culturally aware;
4. trauma-informed; and
5. inclusive of accommodations for students with mobility restrictions, sensory needs, developmental or physical disabilities, mental health needs, and auditory or visual limitations.

**C. Student Mental Health and Wellness**

Active shooter drill protocols must include a reasonable amount of time immediately

following the drill for teachers to debrief with their students. The opportunity to debrief must be provided to students before regular classroom activity may resume. During the debrief period, students must be allowed to access any mental health services available on campus, including counselors, school psychologists, social workers, or cultural liaisons. An active shooter drill must not be combined or conducted consecutively with any other type of emergency preparedness drill. An active shooter drill must be accompanied by an announcement prior to commencing. The announcement must use concise and age-appropriate language and, at a minimum, inform students there is no immediate danger to life and safety.

D. Notice

1. The school district must provide notice of a pending active shooter drill to every student's parent or legal guardian before an active shooter drill is conducted. Whenever practicable, notice must be provided at least 24 hours in advance of a pending active shooter drill and inform the parent or legal guardian of the right to opt their student out of participating.
2. If a student is opted out of participating in an active shooter drill, no negative consequence must impact the student's general school attendance record nor may nonparticipation alone make a student ineligible to participate in or attend school activities.
3. The Commissioner must ensure the availability of alternative safety education for students who are opted out of participating or otherwise exempted from an active shooter drill. Alternative safety education must provide essential safety instruction through less sensorial safety training methods and must be appropriate for students with mobility restrictions, sensory needs, developmental or physical disabilities, mental health needs, and auditory or visual limitations.

E. Participation in Active Shooter Drills

Any student in early childhood through grade 12 must not be required to participate in an active shooter drill that does not meet the Criteria set forth above.

F. Active Shooter Simulations

A student must not be required to participate in an active shooter simulation. An active shooter simulation must not take place during regular school hours if a majority of students are present, or expected to be present, at the school. A parent or legal guardian of a student in grades 9 through 12 must have the opportunity to opt their student into participating in an active shooter simulation.

G. Violence Prevention

1. A school district or charter school conducting an active shooter drill must provide students in middle school and high school at least one hour, or one standard class period, of violence prevention training annually.
2. The violence prevention training must be evidence-based and may be delivered in-person, virtually, or digitally. Training must, at a minimum, teach students the following:
  - a. how to identify observable warning signs and signals of an individual who may be at risk of harming oneself or others;
  - b. the importance of taking threats seriously and seeking help; and
  - c. the steps to report dangerous, violent, threatening, harmful, or

potentially harmful activity, [including providing information about the Department of Public Safety's statewide anonymous threat reporting system and any local threat reporting systems.](#)

**[NOTE: The Minnesota legislature enacted the addition to 2.c in 2025 (Session Law Chapter 35).]**

3. A school district or charter school must ensure that students have the opportunity to contribute to their school's safety and violence prevention planning, aligned with the recommendations for multihazard planning for schools, including but not limited to:
  - a. student opportunities for leadership related to prevention and safety;
  - b. encouragement and support to students in establishing clubs and programs focused on safety; and
  - c. providing students with the opportunity to seek help from adults and to learn about prevention connected to topics including bullying, sexual harassment, sexual assault, and suicide.

H. Board Meeting

At a regularly scheduled school board meeting, a school board of a district that has conducted an active shooter drill must consider the following:

1. the effect of active shooter drills on the safety of students and staff; and
2. the effect of active shooter drills on the mental health and wellness of students and staff.

**V. SAMPLE PROCEDURES INCLUDED IN THIS POLICY**

Sample procedures for the various hazards/emergencies listed below are attached to this Policy for use when drafting specific crisis management plans. Additional sample procedures may be found in the Response section of the *Comprehensive School Safety Guide* (2011 Edition). After approval by the school board, an adopted procedure will become an addendum to the Crisis Management Policy.

- A. Fire
- B. Hazardous Materials
- C. Severe Weather: Tornado/Severe Thunderstorm/Flooding
- D. Medical Emergency
- E. Fight/Disturbance
- F. Assault
- G. Intruder
- H. Weapons
- I. Shooting
- J. Hostage
- K. Bomb Threat

- L. Chemical or Biological Threat
- M. Checklist for Telephone Threats
- N. Demonstration
- O. Suicide
- P. Lock-down Procedures
- Q. Shelter-In-Place Procedures
- R. Evacuation/Relocation
- S. Media Procedures
- T. Post-Crisis Procedures
- U. School Emergency Response Team
- V. Emergency Phone Numbers
- W. Highly Contagious Serious Illness or Pandemic Flu

**VI. MISCELLANEOUS PROCEDURES**

A. Chemical Accidents

Procedures for reporting chemical accidents shall be posted at key locations such as chemistry labs, art rooms, swimming pool areas, and janitorial closets.

**[NOTE: School buildings must maintain Material Safety Data Sheets (M.S.D.S.) for all chemicals on campus. State law, federal law, and OSHA require that pertinent staff have access to M.S.D.S. in the event of a chemical accident.]**

B. Visitors

The school district shall implement procedures mandating visitor sign in and visitors in school buildings. See MSBA/MASA Model Policy 903 (Visitors to School District Buildings and Sites).

The school district shall implement procedures to minimize outside entry into school buildings except at designated check-in points and assure that all doors are locked prior to and after regular building hours.

C. Student Victims of Criminal Offenses at or on School Property

The school district shall establish procedures allowing student victims of criminal offenses on school property the opportunity to transfer to another school within the school district.

**[NOTE: The Every Student Succeeds Act, 20 United States Code, section 6301, et seq.; Title IX, 20 United States Code, section 1681, et seq.; and the Unsafe School Choice Option, 20 United States Code, section 7912, require school districts to establish such transfer procedures.]**

D. Radiological Emergencies at Nuclear Generating Plants [OPTIONAL]

~~School districts within a 10-mile radius of the Monticello or Prairie Island nuclear power~~

plants will implement crisis plans in the event of an accident or incident at the power plant.

Questions relative to the creation or implementation of such plans will be directed to the Minnesota Department of Public Safety.

**Legal References:** Minn. Stat. Ch. 12 (Emergency Management)  
Minn. Stat. Ch. 12A (Natural Disaster; State Assistance)  
Minn. Stat. § 121A.035 (Crisis Management Policy)  
Minn. Stat. § 121A.038 (Students Safe at School)  
Minn. Stat. § 121A.06 (Reports of Dangerous Weapon Incidents in School Zones)  
Minn. Stat. § 299F.30 (Fire Drill in School; Doors and Exits)  
Minn. Stat. § 326B.02, Subd. 6 (Powers)  
Minn. Stat. § 326B.106 (General Powers of Commissioner of Labor and Industry)  
Minn. Stat. § 609.605, Subd. 4 (Trespasses)  
Minn. Rules Ch. 7511 (Fire Code)  
20 U.S.C. § 1681, *et seq.* (Title IX)  
20 U.S.C. § 6301, *et seq.* (Every Student Succeeds Act)  
20 U.S.C. § 7912 (Unsafe School Choice Option)  
42 U.S.C. § 5121 *et seq.* (Disaster Relief and Emergency Assistance)

**Cross References:** MSBA/MASA Model Policy 407 (Employee Right to Know – Exposure to Hazardous Substances)  
MSBA/MASA Model Policy 413 (Harassment and Violence)  
MSBA/MASA Model Policy 501 (School Weapons Policy)  
MSBA/MASA Model Policy 506 (Student Discipline)  
MSBA/MASA Model Policy 532 (Use of Peace Officers and Crisis Teams to Remove Students with IEPs from School Grounds)  
MSBA/MASA Model Policy 903 (Visitors to School District Buildings and Sites)  
*Comprehensive School Safety Guide*  
[Minnesota School Safety Center - Resources \(mn.gov\)](https://mn.gov/school-safety-center/resources)

**Additional Resources:** I Love U Guys Foundation, *Standard Response Protocol*  
<https://iloveuguy.org/The-Standard-Response-Protocol.html> (012325)  
Safe and Sound Schools  
<https://safeandsoundschools.org/> (012325)

## **515 PROTECTION AND PRIVACY OF PUPIL RECORDS**

**[NOTE: School districts are required by statute to have a policy addressing these issues.]**

### **I. PURPOSE**

The school district recognizes its responsibility in regard to the collection, maintenance, and dissemination of pupil records and the protection of the privacy rights of students as provided in federal law and state statutes.

### **II. GENERAL STATEMENT OF POLICY**

The following procedures and policies regarding the protection and privacy of parents and students are adopted by the school district, pursuant to the requirements of 20 United States Code, section 1232g, *et seq.* (Family Educational Rights and Privacy Act (FERPA)) 34 Code of Federal Regulations, part 99 and consistent with the requirements of the Minnesota Government Data Practices Act, Minnesota Statutes, chapter 13, and Minnesota Rules, parts 1205.0100-1205.2000.

### **III. DEFINITIONS**

#### **A. Authorized Representative**

“Authorized representative” means any entity or individual designated by the school district, state, or an agency headed by an official of the Comptroller of the United States, the Attorney General of the United States, the Secretary of the U.S. Department of Education, or state and local educational authorities to conduct, with respect to federal or state supported education programs, any audit or evaluation or any compliance or enforcement activity in connection with federal legal requirements that relate to these programs.

#### **B. Biometric Record**

“Biometric record,” as referred to in “Personally Identifiable,” means a record of one or more measurable biological or behavioral characteristics that can be used for automated recognition of an individual (e.g., fingerprints, retina and iris patterns, voiceprints, DNA sequence, facial characteristics, and handwriting).

#### **C. Dates of Attendance**

“Dates of attendance,” as referred to in “Directory Information,” means the period of time during which a student attends or attended a school or schools in the school district, including attendance in person or by paper correspondence, videoconference, satellite, Internet, or other electronic information and telecommunications technologies for students who are not in the classroom, and including the period during which a student is working under a work-study program. The term does not include specific daily records of a student’s attendance at a school or schools in the school district.

#### **D. Directory Information**

1. “Directory information” means information contained in an education record of a student

that would not generally be considered harmful or an invasion of privacy if disclosed. It includes the student's name, dates of attendance, grade level, enrollment status (i.e., full-time or part-time); participation in officially recognized activities and sports; weight and height of members of athletic teams; and honors and awards received. Directory information does not include:

- a. a student's social security number;
- b. a student's identification number (ID), user ID, or other unique personal identifier used by a student for purposes of accessing or communicating in electronic systems if the identifier may be used to access education records without use of one or more factors that authenticate the student's identity such as a personal identification number (PIN), password, or other factor known or possessed only by the authorized user;
- c. a student ID or other unique personal identifier that is displayed on a student ID badge if the identifier can be used to gain access to educational records when used in conjunction with one or more factors that authenticate the student's identity, such as a PIN, password, or other factor known or possessed only by the student;
- d. personally identifiable data which references religion, race, color, social position, or nationality; or
- e. data collected from nonpublic school students, other than those who receive shared time educational services, unless written consent is given by the student's parent or guardian.

2. Under Minnesota law, a school district may not designate a student's or their parent's home address, telephone number, email address or other personal contact information as "directory information.

[\[NOTE: Please see the MSBA ISD Policy Services Newsletter \(June 2025\) for detailed guidance on creating a definition of "directory information."\]](#)

E. Education Records

1. What constitutes "education records"

Education records means those records that are: (1) directly related to a student; and (2) maintained by the school district or by a party acting for the school district.

2. What does not constitute education records

The term "education records" does not include:

- a. Records of instructional personnel that are:
  - (1) kept in the sole possession of the maker of the record;
  - (2) used only as a personal memory aid;
  - (3) not accessible or revealed to any other individual except a temporary substitute teacher; and
  - (4) destroyed at the end of the school year.

- b. Records of a law enforcement unit of the school district, provided education records maintained by the school district are not disclosed to the unit, and the law enforcement records are:
  - (1) maintained separately from education records;
  - (2) maintained solely for law enforcement purposes; and
  - (3) disclosed only to law enforcement officials of the same jurisdiction.
  
- c. Records relating to an individual, including a student, who is employed by the school district which:
  - (1) are made and maintained in the normal course of business;
  - (2) relate exclusively to the individual in that individual's capacity as an employee; and
  - (3) are not available for use for any other purpose.

However, records relating to an individual in attendance at the school district who is employed as a result of his or her status as a student are education records.
  
- d. Records relating to an eligible student, or a student attending an institution of post-secondary education, that are:
  - (1) made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his or her professional or paraprofessional capacity or assisting in that capacity;
  - (2) made, maintained, or used only in connection with the provision of treatment to the student; and
  - (3) disclosed only to individuals providing the treatment; provided that the records can be personally reviewed by a physician or other appropriate professional of the student's choice. For the purpose of this definition, "treatment" does not include remedial educational activities or activities that are a part of the program of instruction within the school district.
  
- e. Records created or received by the school district after an individual is no longer a student at the school district and that are not directly related to the individual's attendance as a student.
  
- f. Grades on peer-related papers before the papers are collected and recorded by a teacher.

F. Education Support Services Data

"Education support services data" means data on individuals collected, created, maintained, used, or disseminated relating to programs administered by a government entity or entity under contract with a government entity designed to eliminate disparities and advance equities in educational achievement for youth by coordinating services available to participants, regardless of the youth's involvement with other government services. Education support services data does not include welfare data under Minnesota Statutes, section 13.46.

Unless otherwise provided by law, all education support services data are private data on individuals and must not be disclosed except according to Minnesota Statutes, section 13.05 or a court order.

G. Eligible Student

“Eligible student” means a student who has attained eighteen (18) years of age or is attending an institution of post-secondary education.

H. Juvenile Justice System

“Juvenile justice system” includes criminal justice agencies and the judiciary when involved in juvenile justice activities.

I. Legitimate Educational Interest

“Legitimate educational interest” includes an interest directly related to classroom instruction, teaching, student achievement and progress, discipline of a student, student health and welfare, and the ability to respond to a request for education data. It includes a person’s need to know in order to:

1. Perform an administrative task required in the school or employee’s contract or position description approved by the school board;
2. Perform a supervisory or instructional task directly related to the student’s education;
3. Perform a service or benefit for the student or the student’s family such as health care, counseling, student job placement, or student financial aid; or
4. Perform a task directly related to responding to a request for data.

J. Parent

“Parent” means a parent of a student and includes a natural parent, a guardian, or an individual acting as a parent of the student in the absence of a parent or guardian. The school district may presume the parent has the authority to exercise the rights provided herein, unless it has been provided with evidence that there is a state law or court order governing such matters as marriage dissolution, separation or child custody, or a legally binding instrument which provides to the contrary.

K. Personally Identifiable

“Personally identifiable” means that the data or information includes, but is not limited to: (a) a student’s name; (b) the name of the student’s parent or other family member; (c) the address of the student or student’s family; (d) a personal identifier such as the student’s social security number or student number or biometric record; (e) other indirect identifiers, such as the student’s date of birth, place of birth, and mother’s maiden name; (f) other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or (g) information requested by a person who the school district reasonably believes knows the identity of the student to whom the education record relates.

L. Record

“Record” means any information or data recorded in any way including, but not limited to, handwriting, print, computer media, video or audio tape, film, microfilm, and microfiche.

M. Responsible Authority

"Responsible authority" means *Superintendent, Principal, or district level administrative staff*.

N. Student

"Student" includes any individual who is or has been in attendance, enrolled, or registered at the school district and regarding whom the school district maintains education records. "Student" also includes applicants for enrollment or registration at the school district and individuals who receive shared time educational services from the school district.

O. School Official

"School official" includes: (a) a person duly elected to the school board; (b) a person employed by the school board in an administrative, supervisory, instructional, or other professional position; (c) a person employed by the school board as a temporary substitute in a professional position for the period of his or her performance as a substitute; and (d) a person employed by, or under contract to, the school board to perform a special task such as a secretary, a clerk, a public information officer or data practices compliance official, an attorney, or an auditor for the period of his or her performance as an employee or contractor.

P. Summary Data

"Summary data" means statistical records and reports derived from data on individuals but in which individuals are not identified and from which neither their identities nor any other characteristic that could uniquely identify the individual is ascertainable.

Q. Other Terms and Phrases

All other terms and phrases shall be defined in accordance with applicable state and federal law or ordinary customary usage.

**IV. GENERAL CLASSIFICATION**

State law provides that all data collected, created, received, or maintained by a school district are public unless classified by state or federal law as not public or private or confidential. State law classifies all data on individuals maintained by a school district which relates to a student as private data on individuals. This data may not be disclosed to parties other than the parent or eligible student without consent, except pursuant to a valid court order, certain state statutes authorizing access, and the provisions of FERPA and the regulations promulgated thereunder.

**V. STATEMENT OF RIGHTS**

A. Rights of Parents and Eligible Students

Parents and eligible students have the following rights under this policy:

1. The right to inspect and review the student's education records;
2. The right to request the amendment of the student's education records to ensure that they are not inaccurate, misleading, or otherwise in violation of the student's privacy or other rights;
3. The right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that such consent is not required for disclosure pursuant to this policy, state or federal

law, or the regulations promulgated thereunder;

4. The right to refuse release of names, addresses, and home telephone numbers of students in grades 11 and 12 to military recruiting officers and post-secondary educational institutions;
5. The right to file a complaint with the U.S. Department of Education concerning alleged failures by the school district to comply with the federal law and the regulations promulgated thereunder;
6. The right to be informed about rights under the federal law; and
7. The right to obtain a copy of this policy at the location set forth in Section XXI. of this policy.

**B. Eligible Students**

All rights and protections given to parents under this policy transfer to the student when he or she reaches eighteen (18) years of age or enrolls in an institution of post-secondary education. The student then becomes an "eligible student." However, the parents of an eligible student who is also a "dependent student" are entitled to gain access to the education records of such student without first obtaining the consent of the student. In addition, parents of an eligible student may be given access to education records in connection with a health or safety emergency if the disclosure meets the conditions of any provision set forth in 34 Code of Federal Regulations, section 99.31(a).

**C. Students with a Disability**

The school district shall follow 34 Code of Federal Regulations, sections 300.610-300.617 with regard to the privacy, notice, access, recordkeeping, and accuracy of information related to students with a disability.

**VI. DISCLOSURE OF EDUCATION RECORDS**

**A. Consent Required for Disclosure**

1. The school district shall obtain a signed and dated written informed consent of the parent of a student or the eligible student before disclosing personally identifiable information from the education records of the student, except as provided herein.
2. The written consent required by this subdivision must be signed and dated by the parent of the student or the eligible student giving the consent and shall include:
  - a. a specification of the records to be disclosed;
  - b. the purpose or purposes of the disclosure;
  - c. the party or class of parties to whom the disclosure may be made;
  - d. the consequences of giving informed consent; and
  - e. if appropriate, a termination date for the consent.
3. When a disclosure is made under this subdivision:
  - a. if the parent or eligible student so requests, the school district shall provide him or her with a copy of the records disclosed; and

- b. if the parent of a student who is not an eligible student so requests, the school district shall provide the student with a copy of the records disclosed.
- 4. A signed and dated written consent may include a record and signature in electronic form that:
  - a. identifies and authenticates a particular person as the source of the electronic consent; and
  - b. indicates such person's approval of the information contained in the electronic consent.
- 5. If the responsible authority seeks an individual's informed consent to the release of private data to an insurer or the authorized representative of an insurer, informed consent shall not be deemed to have been given unless the statement is:
  - a. in plain language;
  - b. dated;
  - c. specific in designating the particular persons or agencies the data subject is authorizing to disclose information about the data subject;
  - d. specific as to the nature of the information the subject is authorizing to be disclosed;
  - e. specific as to the persons or agencies to whom the subject is authorizing information to be disclosed;
  - f. specific as to the purpose or purposes for which the information may be used by any of the parties named in Clause e. above, both at the time of the disclosure and at any time in the future; and
  - g. specific as to its expiration date which should be within a reasonable time, not to exceed one year except in the case of authorizations given in connection with applications for: (i) life insurance or noncancellable or guaranteed renewable health insurance and identified as such, two years after the date of the policy, or (ii) medical assistance under Minnesota Statutes, chapter 256B or Minnesota Care under Minnesota Statutes, chapter 256L, which shall be ongoing during all terms of eligibility, for individualized education program health-related services provided by a school district that are subject to third party reimbursement.

6. Eligible Student Consent

Whenever a student has attained eighteen (18) years of age or is attending an institution of post-secondary education, the rights accorded to and the consent required of the parent of the student shall thereafter only be accorded to and required of the eligible student, except as provided in Section V. of this policy.

B. Prior Consent for Disclosure Not Required

The school district may disclose personally identifiable information from the education records of a student without the written consent of the parent of the student or the eligible student unless otherwise provided herein, if the disclosure is:

- 1. To other school officials, including teachers, within the school district whom the

school district determines have a legitimate educational interest in such records;

2. To a contractor, consultant, volunteer, or other party to whom the school district has outsourced institutional services or functions provided that the outside party:
  - a. performs an institutional service or function for which the school district would otherwise use employees;
  - b. is under the direct control of the school district with respect to the use and maintenance of education records; and
  - c. will not disclose the information to any other party without the prior consent of the parent or eligible student and uses the information only for the purposes for which the disclosure was made;
3. To officials of other schools, school districts, or post-secondary educational institutions in which the student seeks or intends to enroll, or is already enrolled, as long as the disclosure is for purposes related to the student's enrollment or transfer. The records shall include information about disciplinary action taken as a result of any incident in which the student possessed or used a dangerous weapon, and with proper annual notice (see Section XIX.), suspension and expulsion information pursuant to section 7917 of the federal Every Student Succeeds Act, 20 United States Code, section 7917, and, if applicable, data regarding a student's history of violent behavior. The records also shall include a copy of any probable cause notice or any disposition or court order under Minnesota Statutes, section 260B.171, unless the data are required to be destroyed under Minnesota Statutes, section 120A.22, subdivision 7(c) or section 121A.75. On request, the school district will provide the parent or eligible student with a copy of the education records that have been transferred and provide an opportunity for a hearing to challenge the content of those records in accordance with Section XV. of this policy;
4. To authorized representatives of the Comptroller General of the United States, the Attorney General of the United States, the Secretary of the U.S. Department of Education, or the Commissioner of the State Department of Education or his or her representative, subject to the conditions relative to such disclosure provided under federal law;
5. In connection with financial aid for which a student has applied or has received, if the information is necessary for such purposes as to:
  - a. determine eligibility for the aid;
  - b. determine the amount of the aid;
  - c. determine conditions for the aid; or
  - d. enforce the terms and conditions of the aid.

"Financial aid" for purposes of this provision means a payment of funds provided to an individual or a payment in kind of tangible or intangible property to the individual that is conditioned on the individual's attendance at an educational agency or institution;

6. To state and local officials or authorities to whom such information is specifically allowed to be reported or disclosed pursuant to state statute adopted:
  - a. before November 19, 1974, if the allowed reporting or disclosure concerns the juvenile justice system and such system's ability to

effectively serve the student whose records are released; or

- b. after November 19, 1974, if the reporting or disclosure allowed by state statute concerns the juvenile justice system and the system's ability to effectively serve, prior to adjudication, the student whose records are released, provided the officials and authorities to whom the records are disclosed certify in writing to the school district that the data will not be disclosed to any other party, except as provided by state law, without the prior written consent of the parent of the student. At a minimum, the school district shall disclose the following information to the juvenile justice system under this paragraph: a student's full name, home address, telephone number, and date of birth; a student's school schedule, attendance record, and photographs, if any; and parents' names, home addresses, and telephone numbers;
7. To organizations conducting studies for or on behalf of educational agencies or institutions for the purpose of developing, validating, or administering predictive tests, administering student aid programs, or improving instruction; provided that the studies are conducted in a manner which does not permit the personal identification of parents or students by individuals other than representatives of the organization who have a legitimate interest in the information, the information is destroyed when no longer needed for the purposes for which the study was conducted, and the school district enters into a written agreement with the organization that: (a) specifies the purpose, scope, and duration of the study or studies and the information to be disclosed; (b) requires the organization to use personally identifiable information from education records only to meet the purpose or purposes of the study as stated in the written agreement; (c) requires the organization to conduct the study in a manner that does not permit personal identification of parents and students by anyone other than representatives of the organization with legitimate interests; and (d) requires the organization to destroy all personally identifiable information when information is no longer needed for the purposes for which the study was conducted and specifies the time period in which the information must be destroyed. For purposes of this provision, the term, "organizations," includes, but is not limited to, federal, state, and local agencies and independent organizations. In the event the Department of Education determines that a third party outside of the school district to whom information is disclosed violates this provision, the school district may not allow that third party access to personally identifiable information from education records for at least five (5) years;
8. To accrediting organizations in order to carry out their accrediting functions;
9. To parents of a student eighteen (18) years of age or older if the student is a dependent of the parents for income tax purposes;
10. To comply with a judicial order or lawfully issued subpoena, provided, however, that the school district makes a reasonable effort to notify the parent or eligible student of the order or subpoena in advance of compliance therewith so that the parent or eligible student may seek protective action, unless the disclosure is in compliance with a federal grand jury subpoena, or any other subpoena issued for law enforcement purposes, and the court or other issuing agency has ordered that the existence or the contents of the subpoena or the information furnished in response to the subpoena not be disclosed, or the disclosure is in compliance with an ex parte court order obtained by the United States Attorney General (or designee not lower than an Assistant Attorney General) concerning investigations or prosecutions of an offense listed in 18 United States Code, section 2332b(g)(5)(B), an act of domestic or international terrorism as defined in 18 United States Code, section 2331, or a parent is a party to a court proceeding involving child abuse and neglect or dependency matters, and the order is issued in the context of the proceeding. If the school district initiates

legal action against a parent or student, it may disclose to the court, without a court order or subpoena, the education records of the student that are relevant for the school district to proceed with the legal action as a plaintiff. Also, if a parent or eligible student initiates a legal action against the school district, the school district may disclose to the court, without a court order or subpoena, the student's education records that are relevant for the school district to defend itself;

11. To appropriate parties, including parents of an eligible student, in connection with an emergency if knowledge of the information is necessary to protect the health, including the mental health, or safety of the student or other individuals. The decision is to be based upon information available at the time the threat occurs that indicates that there is an articulable and significant threat to the health or safety of a student or other individuals. In making a determination whether to disclose information under this section, the school district may take into account the totality of the circumstances pertaining to a threat and may disclose information from education records to any person whose knowledge of the information is necessary to protect the health or safety of the student or other students. A record of this disclosure must be maintained pursuant to Section XIII.E. of this policy. In addition, an educational agency or institution may include in the education records of a student appropriate information concerning disciplinary action taken against the student for conduct that posed a significant risk to the safety or well-being of that student, other students, or other members of the school community. This information may be disclosed to teachers and school officials within the school district and/or teachers and school officials in other schools who have legitimate educational interests in the behavior of the student;
12. To the juvenile justice system if information about the behavior of a student who poses a risk of harm is reasonably necessary to protect the health or safety of the student or other individuals;
13. Information the school district has designated as "directory information" pursuant to Section VII. of this policy;
14. To military recruiting officers and post-secondary educational institutions pursuant to Section XI. of this policy;
15. To the parent of a student who is not an eligible student or to the student himself or herself;
16. To appropriate health authorities to the extent necessary to administer immunization programs and for bona fide epidemiologic investigations which the commissioner of health determines are necessary to prevent disease or disability to individuals in the public educational agency or institution in which the investigation is being conducted;
17. To volunteers who are determined to have a legitimate educational interest in the data and who are conducting activities and events sponsored by or endorsed by the educational agency or institution for students or former students;
18. To the juvenile justice system, on written request that certifies that the information will not be disclosed to any other person except as authorized by law without the written consent of the parent of the student:
  - a. the following information about a student must be disclosed: a student's full name, home address, telephone number, date of birth; a student's school schedule, daily attendance record, and photographs, if any; and any parents' names, home addresses, and telephone numbers;

- b. the existence of the following information about a student, not the actual data or other information contained in the student's education record, may be disclosed provided that a request for access must be submitted on the statutory form and it must contain an explanation of why access to the information is necessary to serve the student: (1) use of a controlled substance, alcohol, or tobacco; (2) assaultive or threatening conduct that could result in dismissal from school under the Pupil Fair Dismissal Act; (3) possession or use of weapons or look-alike weapons; (4) theft; or (5) vandalism or other damage to property. Prior to releasing this information, the principal or chief administrative officer of a school who receives such a request must, to the extent permitted by federal law, notify the student's parent or guardian by certified mail of the request to disclose information. If the student's parent or guardian notifies the school official of an objection to the disclosure within ten (10) days of receiving certified notice, the school official must not disclose the information and instead must inform the requesting member of the juvenile justice system of the objection. If no objection from the parent or guardian is received within fourteen (14) days, the school official must respond to the request for information.

The written requests of the juvenile justice system member(s), as well as a record of any release, must be maintained in the student's file;

19. To the principal where the student attends and to any counselor directly supervising or reporting on the behavior or progress of the student if it is information from a disposition order received by a superintendent under Minnesota Statutes, section 260B.171, subdivision 3. The principal must notify the counselor immediately and must place the disposition order in the student's permanent education record. The principal also must notify immediately any teacher or administrator who directly supervises or reports on the behavior or progress of the student whom the principal believes needs the information to work with the student in an appropriate manner, to avoid being needlessly vulnerable, or to protect other persons from needless vulnerability. The principal may also notify other school district employees, substitutes, and volunteers who are in direct contact with the student if the principal determines that these individuals need the information to work with the student in an appropriate manner, to avoid being needlessly vulnerable, or to protect other persons from needless vulnerability. Such notices from the principal must identify the student, outline the offense, and describe any conditions of probation about which the school must provide information if this information is provided in the disposition order. Disposition order information received is private educational data received for the limited purpose of serving the educational needs of the student and protecting students and staff. The information may not be further disseminated by the counselor, teacher, administrator, staff member, substitute, or volunteer except as necessary to serve the student, to protect students and staff, or as otherwise required by law, and only to the student or the student's parent or guardian;
20. To the principal where the student attends if it is information from a peace officer's record of children received by a superintendent under Minnesota Statutes, section 260B.171, subdivision 5. The principal must place the information in the student's education record. The principal also must notify immediately any teacher, counselor, or administrator directly supervising the student whom the principal believes needs the information to work with the student in an appropriate manner, to avoid being needlessly vulnerable, or to protect other persons from needless vulnerability. The principal may also notify other district employees, substitutes, and volunteers who are in direct contact with the student if the principal determines that these individuals need the information to work with the student in an appropriate manner, to avoid being needlessly vulnerable, or to protect other persons from needless vulnerability.

Such notices from the principal must identify the student and describe the alleged offense if this information is provided in the peace officer's notice. Peace officer's record information received is private educational data received for the limited purpose of serving the educational needs of the student and protecting students and staff. The information must not be further disseminated by the counselor, teacher administrator, staff member, substitute, or volunteer except to communicate with the student or the student's parent or guardian as necessary to serve the student, to protect students and staff, or as otherwise required by law.

The principal must delete the peace officer's record from the student's education record, destroy the data, and make reasonable efforts to notify any teacher, counselor, staff member, administrator, substitute, or volunteer who received information from the peace officer's record if the county attorney determines not to proceed with a petition or directs the student into a diversion or mediation program or if a juvenile court makes a decision on a petition and the county attorney or juvenile court notifies the superintendent of such action;

21. To the Secretary of Agriculture, or authorized representative from the Food and Nutrition Service or contractors acting on behalf of the Food and Nutrition Service, for the purposes of conducting program monitoring, evaluations, and performance measurements of state and local educational and other agencies and institutions receiving funding or providing benefits of one or more programs authorized under the National School Lunch Act or the Child Nutrition Act of 1966 for which the results will be reported in an aggregate form that does not identify any individual, on the conditions that: (a) any data collected shall be protected in a manner that will not permit the personal identification of students and their parents by other than the authorized representatives of the Secretary; and (b) any personally identifiable data shall be destroyed when the data are no longer needed for program monitoring, evaluations, and performance measurements; or
22. To an agency caseworker or other representative of a State or local child welfare agency, or tribal organization (as defined in 25 United States Code, section 5304), who has the right to access a student's case plan, as defined and determined by the State or tribal organization, when such agency or organization is legally responsible, in accordance with State or tribal law, for the care and protection of the student, provided that the education records, or the personally identifiable information contained in such records, of the student will not be disclosed by such agency or organization, except to an individual or entity engaged in addressing the student's education needs and authorized by such agency or organization to receive such disclosure and such disclosure is consistent with the State or tribal laws applicable to protecting the confidentiality of a student's education records.
23. When requested, [and in accordance with requirements for parental consent in 34 Code of Federal Regulations, section 300.622\(b\)\(2\), and part 99](#), educational agencies or institutions may share personal student contact information and directory information for students served in special education with postsecondary transition planning and services under Minnesota Statutes, section 125A.08, paragraph (b), clause (1), whether public or private, with the Minnesota Department of Employment and Economic Development, as required for coordination of services to students with disabilities under Minnesota Statutes, sections 125A.08, paragraph (b), clause (1); 125A.023; and 125A.027.

**[\[NOTE: The 2025 Minnesota legislature amended Minnesota Statutes, section 13.32, subdivision 5, to include this update.\]](#)**

C. Nonpublic School Students

The school district may disclose personally identifiable information from the education records of a nonpublic school student, other than a student who receives shared time educational services, without the written consent of the parent of the student or the eligible student unless otherwise provided herein, if the disclosure is:

1. Pursuant to a valid court order;
2. Pursuant to a statute specifically authorizing access to the private data; or
3. To appropriate health authorities to the extent necessary to administer immunization programs and for bona fide epidemiological investigations which the commissioner of health determines are necessary to prevent disease or disability to individuals in the public educational agency or institution in which the investigation is being conducted.

## VII. RELEASE OF DIRECTORY INFORMATION

### A. Educational Data

1. Educational data designated as directory information is public data on individuals to the extent required under federal law. Directory information must be designated pursuant to the provisions of:
  - a. Minnesota Statutes, section 13.32, subdivision 5; and
  - b. 20 United States Code, section 1232g, and 34 Code of Federal Regulations, section 99.37, which were in effect on January 3, 2012.
2. The school district may not designate a student's home address, telephone number, email address, or other personal contact information as directory information under [Minnesota Statutes, section 13.32](#).
3. ~~A parent's personal contact information must be treated as private data on individuals regardless of whether that contact information was previously designated as or treated as directory information under Minnesota Statutes, section 13.32, subdivision 2.~~
43. When requested, the school district must share personal contact information and directory information, whether public or private, with the Minnesota Department of Education, as required for federal reporting purposes.

~~[NOTE: This section became effective on the day following final enactment (May 19, 2023). Beginning on the effective date, a student's personal contact information subject to this section must be treated as private educational data under Minnesota Statutes, section 13.32, regardless of whether that contact information was previously designated as directory information under Minnesota Statutes, section 13.32, subdivision 5].~~

### B. Former Students

Unless a former student validly opted out of the release of directory information while the student was in attendance and has not rescinded the opt out request at any time, the school district may disclose directory information from the education records generated by it regarding the former student without meeting the requirements of Paragraph C. of this section. In addition, under an explicit exclusion from the definition of an "education record," the school district may release records that only contain information about an individual obtained after he or she is no longer a student at the school district and that are not directly related to the individual's attendance as a student (e.g., a student's activities as an alumnus of the school district).

C. Present Students and Parents

The school district may disclose directory information from the education records of a student and information regarding parents without prior written consent of the parent of the student or eligible student, except as provided herein.

1. When conducting the directory information designation and notice process required by federal law, the school district shall give parents and students notice of the right to refuse to let the district designate specified data about the student as directory information.
2. The school district shall give annual notice by any means that are reasonably likely to inform the parents and eligible students of:
  - a. the types of personally identifiable information regarding students and/or parents that the school district has designated as directory information;
  - b. the parent's or eligible student's right to refuse to let the school district designate any or all of those types of information about the student and/or the parent as directory information; and
  - c. the period of time in which a parent or eligible student has to notify the school district in writing that he or she does not want any or all of those types of information about the student and/or the parent designated as directory information.

~~[NOTE: Federal law allows a school district to specify that the disclosure of directory information will be limited to specific parties, for specific purposes, or both. If the school district chooses to impose these limitations, it is advisable to add a new paragraph VII.C.31.d. that specifies that disclosures of directory information will be limited to specific parties and/or for specific purposes and identify those parties and/or purposes.]~~

~~To the extent a school district adds these restrictions, it must then limit its directory information disclosures to those individuals and/or purposes specified in this public notice. Procedures to address how these restrictions will be enforced by the school district are advised. This is an important policy decision for the local school board which must balance not only the privacy interests of the student against public disclosure, but also the additional administrative requirements such restrictions will place on the school district.]~~

3. Allow a reasonable period of time after such notice has been given for a parent or eligible student to inform the school district in writing that any or all of the information so designated should not be disclosed without the parent's or eligible student's prior written consent, except as provided in Section VI. of this policy.
4. A parent or eligible student may not opt out of the directory information disclosures to:
  - a. prevent the school district from disclosing or requiring the student to disclose the student's name, ID, or school district e-mail address in a class in which the student is enrolled; or
  - b. prevent the school district from requiring a student to wear, to display publicly, or to disclose a student ID card or badge that exhibits information that may be designated as directory information and that has been properly designated by the school district as directory information.

5. The school district shall not disclose or confirm directory information without meeting the written consent requirements contained in Section VI.A. of this policy if a student's social security number or other non-directory information is used alone or in combination with other data elements to identify or help identify the student or the student's records.

D. Procedure for Obtaining Nondisclosure of Directory Information

The parent's or eligible student's written notice shall be directed to the responsible authority and shall include the following:

1. Name of the student and/or parent, as appropriate;
2. Home address;
3. School presently attended by student;
4. Parent's legal relationship to student, if applicable; and
5. Specific categories of directory information to be made not public without the parent's or eligible student's prior written consent, which shall only be applicable for that school year.

E. Duration

The designation of any information as directory information about a student or parents will remain in effect for the remainder of the school year unless the parent or eligible student provides the written notifications provided herein.

### **VIII. DISCLOSURE OF PRIVATE RECORDS**

A. Private Records

For the purposes herein, education records are records which are classified as private data on individuals by state law and which are accessible only to the student who is the subject of the data and the student's parent if the student is not an eligible student. The school district may not disclose private records or their contents except as summary data, or except as provided in Section VI. of this policy, without the prior written consent of the parent or the eligible student. The school district will use reasonable methods to identify and authenticate the identity of parents, students, school officials, and any other party to whom personally identifiable information from education records is disclosed.

B. Private Records Not Accessible to Parent

In certain cases, state law intends, and clearly provides, that certain information contained in the education records of the school district pertaining to a student be accessible to the student alone, and to the parent only under special circumstances, if at all.

1. The responsible authority may deny access to private data by a parent when a minor student who is the subject of that data requests that the responsible authority deny such access. The minor student's request must be submitted in writing setting forth the reasons for denying access to the parent and must be signed by the minor. Upon receipt of such request the responsible authority shall determine if honoring the request to deny the parent access would be in the best interest of the minor data subject. In making this determination the responsible authority shall consider the following factors:
  - a. whether the minor is of sufficient age and maturity to be able to explain

the reasons for and understand the consequences of the request to deny access;

- b. whether the personal situation of the minor is such that denying parental access may protect the minor data subject from physical or emotional harm;
- c. whether there are grounds for believing that the minor data subject's reasons for precluding parental access are reasonably accurate;
- d. whether the data in question is of such a nature that disclosure of it to the parent may lead to physical or emotional harm to the minor data subject; and
- e. whether the data concerns medical, dental or other health services provided pursuant to Minnesota Statutes, sections 144.341-144.347, in which case the data may be released only if the failure to inform the parent would seriously jeopardize the health of the minor.

C. Private Records Not Accessible to Student

Students shall not be entitled to access to private data concerning financial records and statements of the student's parent or any information contained therein.

D. Military-Connected Youth Identifier

When a school district updates its enrollment forms in the ordinary course of business, the school district must include a box on the enrollment form to allow students to self-identify as a military-connected youth. For purposes of this section, a "military-connected youth" means having an immediate family member, including a parent or sibling, who is currently in the armed forces either as a reservist or on active duty or has recently retired from the armed forces. Data collected under this provision is private data on individuals, but summary data may be published by the Department of Education.

**IX. DISCLOSURE OF CONFIDENTIAL RECORDS**

A. Confidential Records

Confidential records are those records and data contained therein which are made not public by state or federal law, and which are inaccessible to the student and the student's parents or to an eligible student.

B. Reports Under the Maltreatment of Minors Reporting Act

Pursuant to Minnesota Statutes, chapter 260E, written copies of reports pertaining to a neglected and/or physically and/or sexually abused child shall be accessible only to the appropriate welfare and law enforcement agencies. In respect to other parties, such data shall be confidential and will not be made available to the parent or the subject individual by the school district. The subject individual, however, may obtain a copy of the report from either the local welfare agency, county sheriff, or the local police department subject to the provisions of Minnesota Statutes, chapter 260E.

Regardless of whether a written report is made under Minnesota Statutes, chapter 260E, as soon as practicable after a school receives information regarding an incident that may constitute maltreatment of a child in a school facility, the school shall inform the parent, legal guardian, or custodian of the child that an incident occurred that may constitute maltreatment of the child, when the incident occurred, and the nature of the conduct that may constitute maltreatment.

C. Investigative Data

Data collected by the school district as part of an active investigation undertaken for the purpose of the commencement or defense of pending civil legal action, or are retained in anticipation of a pending civil legal action are classified as protected nonpublic data in the case of data not on individuals, and confidential data in the case of data on individuals.

1. The school district may make any data classified as protected non-public or confidential pursuant to this subdivision accessible to any person, agency, or the public if the school district determines that such access will aid the law enforcement process, promote public health or safety, or dispel widespread rumor or unrest.
2. A complainant has access to a statement he or she provided to the school district.
3. Parents or eligible students may have access to investigative data of which the student is the subject, but only to the extent the data is not inextricably intertwined with data about other school district students, school district employees, and/or attorney data as defined in Minnesota Statutes, section 13.393.
4. Once a civil investigation becomes inactive, civil investigative data becomes public unless the release of the data would jeopardize another pending civil legal action, except for those portions of such data that are classified as not public data under state or federal law. Any civil investigative data presented as evidence in court or made part of a court record shall be public. For purposes of this provision, a civil investigation becomes inactive upon the occurrence of any of the following events:
  - a. a decision by the school district, or by the chief attorney for the school district, not to pursue the civil legal action. However, such investigation may subsequently become active if the school district or its attorney decides to renew the civil legal action;
  - b. the expiration of the time to file a complaint under the statute of limitations or agreement applicable to the civil legal action; or
  - c. the exhaustion or expiration of rights of appeal by either party to the civil legal action.
5. A "pending civil legal action" for purposes of this subdivision is defined as including, but not limited to, judicial, administrative, or arbitration proceedings.

D. Chemical Abuse Records

To the extent the school district maintains records of the identity, diagnosis, prognosis, or treatment of any student which are maintained in connection with the performance of any drug abuse prevention function conducted, regulated, or directly or indirectly assisted by any department or agency of the United States, such records are classified as confidential and shall be disclosed only for the purposes and under the circumstances expressly authorized by law.

**X. DISCLOSURE OF SCHOOL RECORDS PRIOR TO EXCLUSION OR EXPULSION HEARING**

At a reasonable time prior to any exclusion or expulsion hearing, the student and the student's parent or guardian or representative shall be given access to all school district records pertaining to the student, including any tests or reports upon which the action proposed by the school district may be based, pursuant to the Minnesota Pupil Fair Dismissal Act, Minnesota Statutes,

section 121A.40, *et seq.*

**XI. DISCLOSURE OF DATA TO MILITARY RECRUITING OFFICERS AND POST-SECONDARY EDUCATIONAL INSTITUTIONS**

- A. The school district will release the names, addresses, electronic mail address (which shall be the electronic mail addresses provided by the school district, if available, that may be released to military recruiting officers only), and home telephone numbers of students in grades 11 and 12 to military recruiting officers and post-secondary educational institutions within sixty (60) days after the date of the request unless a parent or eligible student has refused in writing to release this data pursuant to Paragraph C. below.
- B. Data released to military recruiting officers under this provision:
1. may be used only for the purpose of providing information to students about military service, state and federal veterans' education benefits, and other career and educational opportunities provided by the military;
  2. cannot be further disseminated to any other person except personnel of the recruiting services of the armed forces; and
  3. copying fees shall not be imposed.
- C. A parent or eligible student has the right to refuse the release of the name, address, electronic mail addresses (which shall be the electronic mail addresses provided by the school, if available, that may be released to military recruiting officers only) or home telephone number to military recruiting officers and post-secondary educational institutions. To refuse the release of the above information to military recruiting officers and post-secondary educational institutions, a parent or eligible student must notify the responsible authority in writing at the beginning of each school year. The written request must include the following information:
1. Name of student and parent, as appropriate;
  2. Home address;
  3. Student's grade level;
  4. School presently attended by student;
  5. Parent's legal relationship to student, if applicable;
  6. Specific category or categories of information which are not to be released to military recruiting officers and post-secondary educational institutions; and
  7. Specific category or categories of information which are not to be released to the public, including military recruiting officers and post-secondary educational institutions.
- D. Annually, the school district will provide public notice by any means that are reasonably likely to inform the parents and eligible students of their rights to refuse to release the names, addresses, and home phone numbers of students in grades 11 and 12 without prior consent.
- E. A parent or eligible student's refusal to release the above information to military recruiting officers and post-secondary educational institutions does not affect the school district's release of directory information to the rest of the public, which includes military recruiting officers and post-secondary educational institutions. In order to make any directory information about a student private, the procedures contained in Section VII.

of this policy also must be followed. Accordingly, to the extent the school district has designated the name, address, home phone number, and grade level of students as directory information, absent a request from a parent or eligible student not to release such data, this information will be public data and accessible to members of the public, including military recruiting officers and post-secondary educational institutions.

## **XII. LIMITS ON REDISCLOSURE**

### **A. Redisclosure**

Consistent with the requirements herein, the school district may only disclose personally identifiable information from the education records of a student on the condition that the party to whom the information is to be disclosed will not disclose the information to any other party without the prior written consent of the parent of the student or the eligible student, except that the officers, employees, and agents of any party receiving personally identifiable information under this section may use the information, but only for the purposes for which the disclosure was made.

### **B. Redisclosure Not Prohibited**

1. Subdivision A. of this section does not prevent the school district from disclosing personally identifiable information under Section VI. of this policy with the understanding that the party receiving the information may make further disclosures of the information on behalf of the school district provided:
  - a. The disclosures meet the requirements of Section VI. of this policy; and
  - b. The school district has complied with the record-keeping requirements of Section XIII. of this policy.
2. Subdivision A. of this section does not apply to disclosures made pursuant to court orders or lawfully issued subpoenas or litigation, to disclosures of directory information, to disclosures to a parent or student or to parents of dependent students, or to disclosures concerning sex offenders and other individuals required to register under 42 United States Code, section 14071. However, the school district must provide the notification required in Section XII.D. of this policy if a redisclosure is made based upon a court order or lawfully issued subpoena.

**[NOTE: 42 United States Code, section 14071 was repealed. School districts should retain this statutory reference, however, as it remains a reference in FERPA and the Minnesota Government Data Practices Act and still may apply to individuals required to register prior to the repeal of this law.]**

### **C. Classification of Disclosed Data**

The information disclosed shall retain the same classification in the hands of the party receiving it as it had in the hands of the school district.

### **D. Notification**

The school district shall inform the party to whom a disclosure is made of the requirements set forth in this section, except for disclosures made pursuant to court orders or lawfully issued subpoenas, disclosure of directory information under Section VII. of this policy, disclosures to a parent or student, or disclosures to parents of a dependent student. In the event that the Family Policy Compliance Office determines that a state or local educational authority, a federal agency headed by an official listed in 34 Code of Federal Regulations, section 99.31(a)(3), or an authorized representative of a state or local educational authority or a federal agency headed by an official listed

in section 99.31(a)(3), or a third party outside of the school district improperly rediscloses personally identifiable information from education records or fails to provide notification required under this section of this policy, the school district may not allow that third party access to personally identifiable information from education records for at least five (5) years.

### **XIII. RESPONSIBLE AUTHORITY; RECORD SECURITY; AND RECORD KEEPING**

#### **A. Responsible Authority**

The responsible authority shall be responsible for the maintenance and security of student records.

#### **B. Record Security**

The principal of each school subject to the supervision and control of the responsible authority shall be the records manager of the school, and shall have the duty of maintaining and securing the privacy and/or confidentiality of student records.

#### **C. Plan for Securing Student Records**

The building principal shall submit to the responsible authority a written plan for securing students records by September 1 of each school year. The written plan shall contain the following information:

1. A description of records maintained;
2. Titles and addresses of person(s) responsible for the security of student records;
3. Location of student records, by category, in the buildings;
4. Means of securing student records; and
5. Procedures for access and disclosure.

#### **D. Review of Written Plan for Securing Student Records**

The responsible authority shall review the plans submitted pursuant to Paragraph C. of this section for compliance with the law, this policy, and the various administrative policies of the school district. The responsible authority shall then promulgate a chart incorporating the provisions of Paragraph C. which shall be attached to and become a part of this policy.

#### **E. Record Keeping**

1. The principal shall, for each request for and each disclosure of personally identifiable information from the education records of a student, maintain a record, with the education records of the student, that indicates:
  - a. the parties who have requested or received personally identifiable information from the education records of the student;
  - b. the legitimate interests these parties had in requesting or obtaining the information; and
  - c. the names of the state and local educational authorities and federal officials and agencies listed in Section VI.B.4. of this policy that may make further disclosures of personally identifiable information from the student's education records without consent.

2. In the event the school district discloses personally identifiable information from an education record of a student pursuant to Section XII.B. of this policy, the record of disclosure required under this section shall also include:
  - a. the names of the additional parties to which the receiving party may disclose the information on behalf of the school district;
  - b. the legitimate interests under Section VI. of this policy which each of the additional parties has in requesting or obtaining the information; and
  - c. a copy of the record of further disclosures maintained by a state or local educational authority or federal official or agency listed in Section VI.B.4. of this policy in accordance with 34 Code of Federal Regulations, section 99.32 and to whom the school district disclosed information from an education record. The school district shall request a copy of the record of further disclosures from a state or local educational authority or federal official or agency to whom education records were disclosed upon a request from a parent or eligible student to review the record of requests for disclosure.
  
3. Section XIII.E.1. does not apply to requests by or disclosure to a parent of a student or an eligible student, disclosures pursuant to the written consent of a parent of a student or an eligible student, requests by or disclosures to other school officials under Section VI.B.1. of this policy, to requests for disclosures of directory information under Section VII. of this policy, or to a party seeking or receiving the records as directed by a federal grand jury or other law enforcement subpoena and the issuing court or agency has ordered that the existence or the contents of the subpoena or the information provided in response to the subpoena not be disclosed or as directed by an ex parte court order obtained by the United States Attorney General (or designee not lower than an Assistant Attorney General) concerning investigations or prosecutions of an offense listed in 18 United States Code, section 2332b(g)(5)(B) or an act of domestic or international terrorism.
 

**[NOTE: While Section XIII.E.1. does not apply to requests for or disclosures of directory information under Section VII. of this policy, to the extent the school district chooses to limit the disclosure of directory information to specific parties, for specific purposes, or both, it is advisable that records be kept to identify the party to whom the disclosure was made and/or purpose for the disclosure.]**
  
4. The record of requests of disclosures may be inspected by:
  - a. the parent of the student or the eligible student;
  - b. the school official or his or her assistants who are responsible for the custody of the records; and
  - c. the parties authorized by law to audit the record-keeping procedures of the school district.
  
5. The school district shall record the following information when it discloses personally identifiable information from education records under the health or safety emergency exception:
  - a. the articulable and significant threat to the health or safety of a student or other individual that formed the basis for the disclosure; and
  - b. the parties to whom the school district disclosed the information.

6. The record of requests and disclosures shall be maintained with the education records of the student as long as the school district maintains the student's education records.

#### **XIV. RIGHT TO INSPECT AND REVIEW EDUCATION RECORDS**

A. Parent of a Student, an Eligible Student or the Parent of an Eligible Student Who is Also a Dependent Student

The school district shall permit the parent of a student, an eligible student, or the parent of an eligible student who is also a dependent student who is or has been in attendance in the school district to inspect or review the education records of the student, except those records which are made confidential by state or federal law or as otherwise provided in Section VIII. of this policy.

B. Response to Request for Access

The school district shall respond to any request pursuant to Subdivision A. of this section immediately, if possible, or within ten (10) days of the date of the request, excluding Saturdays, Sundays, and legal holidays.

C. Right to Inspect and Review

The right to inspect and review education records under Subdivision A. of this section includes:

1. The right to a response from the school district to reasonable requests for explanations and interpretations of records; and
2. If circumstances effectively prevent the parent or eligible student from exercising the right to inspect and review the education records, the school district shall provide the parent or eligible student with a copy of the records requested or make other arrangements for the parent or eligible student to inspect and review the requested records.
3. Nothing in this policy shall be construed as limiting the frequency of inspection of the education records of a student with a disability by the student's parent or guardian or by the student upon the student reaching the age of majority.

D. Form of Request

Parents or eligible students shall submit to the school district a written request to inspect education records which identify as precisely as possible the record or records he or she wishes to inspect.

E. Collection of Student Records

If a student's education records are maintained in more than one location, the responsible authority may collect copies of the records or the records themselves from the various locations so they may be inspected at one site. However, if the parent or eligible student wishes to inspect these records where they are maintained, the school district shall attempt to accommodate those wishes. The parent or eligible student shall be notified of the time and place where the records may be inspected.

F. Records Containing Information on More Than One Student

If the education records of a student contain information on more than one student, the parent or eligible student may inspect and review or be informed of only the specific information which pertains to that student.

G. Authority to Inspect or Review

The school district may presume that either parent of the student has authority to inspect or review the education records of a student unless the school district has been provided with evidence that there is a legally binding instrument or a state law or court order governing such matters as marriage dissolution, separation, or custody which provides to the contrary.

H. Fees for Copies of Records

1. The school district shall charge a reasonable fee for providing photocopies or printed copies of records unless printing a copy is the only method to provide for the inspection of data. In determining the amount of the reasonable fee, the school district shall consider the following:
  - a. the cost of materials, including paper, used to provide the copies;
  - b. the cost of the labor required to prepare the copies;
  - c. any schedule of standard copying charges established by the school district in its normal course of operations;
  - d. any special costs necessary to produce such copies from machine-based record-keeping systems, including but not limited to computers and microfilm systems; and
  - e. mailing costs.
2. If 100 or fewer pages of black and white, letter or legal size paper copies are requested, actual costs shall not be used, and, instead, the charge shall be no more than 25 cents for each page copied.
3. The cost of providing copies shall be borne by the parent or eligible student.
4. The responsible authority, however, may not impose a fee for a copy of an education record made for a parent or eligible student if doing so would effectively prevent or, in the case of a student with a disability, impair the parent or eligible student from exercising their right to inspect or review the student's education records.

**XV. REQUEST TO AMEND RECORDS; PROCEDURES TO CHALLENGE DATA**

A. Request to Amend Education Records

The parent of a student or an eligible student who believes that information contained in the education records of the student is inaccurate, misleading, or violates the privacy rights of the student may request that the school district amend those records.

1. The request shall be in writing, shall identify the item the requestor believes to be inaccurate, misleading, or in violation of the privacy or other rights of the student, shall state the reason for this belief, and shall specify the correction the requestor wishes the school district to make. The request shall be signed and dated by the requestor.
2. The school district shall decide whether to amend the education records of the student in accordance with the request within thirty (30) days after receiving the request.
3. If the school district decides to refuse to amend the education records of the

student in accordance with the request, it shall inform the parent of the student or the eligible student of the refusal and advise the parent or eligible student of the right to a hearing under Subdivision B. of this section.

B. Right to a Hearing

If the school district refuses to amend the education records of a student, the school district, on request, shall provide an opportunity for a hearing in order to challenge the content of the student's education records to ensure that information in the education records of the student is not inaccurate, misleading, or otherwise in violation of the privacy or other rights of the student. A hearing shall be conducted in accordance with Subdivision C. of this section.

1. If, as a result of the hearing, the school district decides that the information is inaccurate, misleading, or otherwise in violation of the privacy or other rights of the student, it shall amend the education records of the student accordingly and so inform the parent of the student or the eligible student in writing.
2. If, as a result of the hearing, the school district decides that the information is not inaccurate, misleading, or otherwise in violation of the privacy or other rights of the student, it shall inform the parent or eligible student of the right to place a statement in the record commenting on the contested information in the record or stating why he or she disagrees with the decision of the school district, or both.
3. Any statement placed in the education records of the student under Subdivision B. of this section shall:
  - a. be maintained by the school district as part of the education records of the student so long as the record or contested portion thereof is maintained by the school district; and
  - b. if the education records of the student or the contested portion thereof is disclosed by the school district to any party, the explanation shall also be disclosed to that party.

C. Conduct of Hearing

1. The hearing shall be held within a reasonable period of time after the school district has received the request, and the parent of the student or the eligible student shall be given notice of the date, place, and time reasonably in advance of the hearing.
2. The hearing may be conducted by any individual, including an official of the school district who does not have a direct interest in the outcome of the hearing. The school board attorney shall be in attendance to present the school board's position and advise the designated hearing officer on legal and evidentiary matters.
3. The parent of the student or eligible student shall be afforded a full and fair opportunity for hearing to present evidence relative to the issues raised under Subdivisions A. and B. of this section and may be assisted or represented by individuals of his or her choice at his or her own expense, including an attorney.
4. The school district shall make a decision in writing within a reasonable period of time after the conclusion of the hearing. The decision shall be based solely on evidence presented at the hearing and shall include a summary of evidence and reasons for the decision.

D. Appeal

The final decision of the designated hearing officer may be appealed in accordance with the applicable provisions of Minnesota Statutes, chapter 14 relating to contested cases.

#### **XVI. PROBLEMS ACCESSING DATA**

- A. The data practices compliance official is the designated employee to whom persons may direct questions or concerns regarding problems in obtaining access to data or other data practices problems.
- B. Data practices compliance official means Administrative Assistant to the Superintendent, Kimberley Deming
- C. Any request by an individual with a disability for reasonable modifications of the school district's policies or procedures for purposes of accessing records shall be made to the data practices compliance official.

#### **XVII. COMPLAINTS FOR NONCOMPLIANCE WITH FERPA**

A. Where to File Complaints

Complaints regarding alleged violations of rights accorded parents and eligible students by FERPA, and the rules promulgated thereunder, shall be submitted in writing to the U.S. Department of Education, Student Privacy Policy Office, 400 Maryland Avenue S.W., Washington, D.C. 20202-8520.

B. Content of Complaint

A complaint filed pursuant to this section must contain specific allegations of fact giving reasonable cause to believe that a violation of FERPA and the rules promulgated thereunder has occurred.

#### **XVIII. WAIVER**

A parent or eligible student may waive any of his or her rights provided herein pursuant to FERPA. A waiver shall not be valid unless in writing and signed by the parent or eligible student. The school district may not require such a waiver.

#### **XIX. ANNUAL NOTIFICATION OF RIGHTS**

A. Contents of Notice

The school district shall give parents of students currently in attendance and eligible students currently in attendance annual notice by such means as are reasonably likely to inform the parents and eligible students of the following:

- 1. That the parent or eligible student has a right to inspect and review the student's education records and the procedure for inspecting and reviewing education records;
- 2. That the parent or eligible student has a right to seek amendment of the student's education records to ensure that those records are not inaccurate, misleading, or otherwise in violation of the student's privacy or other rights and the procedure for requesting amendment of records;
- 3. That the parent or eligible student has a right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that federal and state law and the regulations promulgated thereunder authorize disclosure without consent;

4. That the parent or eligible student has a right to file a complaint with the U.S. Department of Education regarding an alleged failure by the school district to comply with the requirements of FERPA and the rules promulgated thereunder;
5. The criteria for determining who constitutes a school official and what constitutes a legitimate educational interest for purposes of disclosing education records to other school officials whom the school district has determined to have legitimate educational interests; and
6. That the school district forwards education records on request to a school in which a student seeks or intends to enroll or is already enrolled as long as the disclosure is for purposes related to the student's enrollment or transfer and that such records may include suspension and expulsion records pursuant to the federal Every Student Succeeds Act and, if applicable, a student's history of violent behavior.

**B. Notification to Parents of Students Having a Primary Home Language Other Than English**

The school district shall provide for the need to effectively notify parents of students identified as having a primary or home language other than English.

**C. Notification to Parents or Eligible Students Who are Disabled**

The school district shall provide for the need to effectively notify parents or eligible students identified as disabled.

**XX. DESTRUCTION AND RETENTION OF RECORDS**

Destruction and retention of records by the school district shall be controlled by state and federal law.

**XXI. COPIES OF POLICY**

Copies of this policy may be obtained by parents and eligible students at the superintendent's office.

- Legal References:**
- Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act)
  - Minn. Stat. § 13.32, Subd. 5 (Directory Information)
  - Minn. Stat. § 13.393 (Attorneys)
  - Minn. Stat. Ch. 14 (Administrative Procedures Act)
  - Minn. Stat. § 120A.22 (Compulsory Instruction)
  - Minn. Stat. § 121A.40-121A.56 (The Pupil Fair Dismissal Act)
  - Minn. Stat. § 121A.75 (Receipt of Records; Sharing)
  - Minn. Stat. § 127A.852 (Military-Connected Youth Identifier)
  - Minn. Stat. § 144.341-144.347 (Consent of Minors for Health Services)
  - Minn. Stat. Ch. 256B (Medical Assistance for Needy Persons)
  - Minn. Stat. Ch. 256L (MinnesotaCare)
  - Minn. Stat. § 260B.171, Subds. 3 and 5 (Disposition Order and Peace Officer Records of Children)
  - Minn. Stat. Ch. 260E (Reporting of Maltreatment of Minors)
  - Minn. Stat. § 363A.42 (Public Records; Accessibility)
  - Minn. Stat. § 480.40 (Personal Information, Dissemination)
  - Minn. Stat. § 626.557 (Reporting of Maltreatment of Vulnerable Adults)
  - Minn. Rules Parts 1205.0100-1205.2000 (Data Practices)
  - 10 U.S.C. § 503(b) and (c) (Enlistments: Recruiting Campaigns; Compilation of Directory Information)
  - 18 U.S.C. § 2331 (Definitions)
  - 18 U.S.C. § 2332b (Acts of Terrorism Transcending National Boundaries)
  - 20 U.S.C. § 1232g *et seq.* (Family Educational Rights and Privacy Act)
  - 20 U.S.C. § 6301 *et seq.* (Every Student Succeeds Act)

20 U.S.C. § 7908 (Armed Forces Recruiting Information)  
20 U.S.C. § 7917 (Transfer of School Disciplinary Records)  
25 U.S.C. § 5304 (Definitions – Tribal Organization)  
26 U.S.C. §§ 151 and 152 (Internal Revenue Code)  
42 U.S.C. § 1711 *et seq.* (Child Nutrition Act)  
42 U.S.C. § 1751 *et seq.* (Richard B. Russell National School Lunch Act)  
34 C.F.R. §§ 99.1-99.67 (Family Educational Rights and Privacy)  
34 C.F.R. § 300.610-300.627 (Confidentiality of Information)  
42 C.F.R. § 2.1 *et seq.* (Confidentiality of Drug Abuse Patient Records)  
*Gonzaga University v. Doe*, 536 U.S. 273 309 (2002)  
Dept. of Admin. Advisory Op. No. 21-008 (December 8, 2021)

**Cross References:** MSBA/MASA Model Policy 414 (Mandated Reporting of Child Neglect or Physical or Sexual Abuse)  
MSBA/MASA Model Policy 417 (Chemical Use and Abuse)  
MSBA/MASA Model Policy 506 (Student Discipline)  
MSBA/MASA Model Policy 519 (Interviews of Students by Outside Agencies)  
MSBA/MASA Model Policy 520 (Student Surveys)  
MSBA/MASA Model Policy 711 (Video Recording on School Buses)  
MSBA/MASA Model Policy 722 (Public Data Requests)  
MSBA/MASA Model Policy 906 (Community Notification of Predatory Offenders)  
MSBA School Law Bulletin "I" (School Records – Privacy – Access to Data)

### **Additional Resources**

#### **U.S. Department of Education**

FAQs on Photos and Videos under FERPA | Protecting Student Privacy (012325)  
<https://studentprivacy.ed.gov/faq/faqs-photos-and-videos-under-ferpa>

Letter to Wachter Regarding Surveillance Video of Multiple Students | Protecting Student Privacy (012325)  
<https://studentprivacy.ed.gov/resources/letter-wachter-regarding-surveillance-video-multiple-students>

School Resource Officers, School Law Enforcement Units, and the Family Educational Rights and Privacy Act (FERPA) | Protecting Student Privacy (012325)

Protecting Student Privacy While Using Online Educational Services: Requirements and Best Practices | Protecting Student Privacy (102325)

FERPA/IDEA Crosswalk | Protecting Student Privacy (012325)

What is the Protection of Pupil Rights Amendment? | Protecting Student Privacy (012325)



## ADDENDUM

**Regular Board Meeting  
Wednesday, September 17, 2025  
SPCC-Governor's Room  
5:00PM**

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### VII. ACTION ITEMS

<b>7. AGENDA ITEM #7</b>
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**Subject:** Consider the Approval of the ELA Curriculum Purchase

**Action:** Requires a Motion

**Background:** Policy 606 gives the School Board the final authority over decisions regarding the selection of textbook and instructional materials. A recommendation to purchase ELA curriculum materials will be presented to the board for approval. The Education Committee reviewed the proposal at its September 11th meeting and recommended the proposal move forward to the full board for approval. Additional information is provided in the board packet.

**Presentation:** Superintendent of Schools, Jon Graff  
North Elementary Principal/Curriculum Coordinator, Darin Doherty  
South Elementary Principal, Jana Sykora

**Options/Recommendation:** I recommend the approval of a one year purchase for CAREI Morphology to be implemented as a pilot in the 2025-2026 school year.



C

**MEMO TO:** Superintendent Dr. Jon Graff  
**FROM:** Darin Doherty, Principal  
North Elementary School  
**DATE:** September 9, 2025  
**SUBJECT:** Proposal to Pilot CAREI Morphology  
Curriculum for Grades 3–5

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The purpose of this proposal is to recommend the implementation of a pilot program using the CAREI Morphology curriculum at North Elementary (grades 3–4) and Saint Peter Middle School (grade 5). This program directly aligns with the Minnesota READ Act training requirements and fills a critical instructional gap in Tier 1 core reading instruction that our current Fountas and Pinnell Classroom curriculum does not fully address.

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## Rationale

- **Alignment with the READ Act:** CAREI Morphology builds foundational skills in morphology, phonics, decoding, and word recognition that are directly emphasized in the state’s Read Act training modules.
  - **Closing Instructional Gaps:** While Fountas and Pinnell provides strong resources in listening comprehension, guided reading, and text-level work, it lacks sufficient explicit instruction in morphology and word structure. CAREI addresses this missing piece by providing systematic instruction in how words are built, which supports decoding, vocabulary, and spelling.
  - **Research-Based Resource:** The curriculum was developed by the **Center for Applied Research and Educational Improvement (CAREI) at the University of Minnesota**, ensuring a strong research foundation and alignment to state literacy initiatives.
  - **Support for Struggling Readers:** Morphological awareness has been shown to be especially effective in supporting students who struggle with decoding and vocabulary growth, helping to close achievement gaps in upper elementary.
-

## Pilot Scope

The pilot will involve:

- **North Elementary (Grades 3–4)**
- **Saint Peter Middle School (Grade 5)**

The pilot will be implemented during the 2025–2026 school year and will be monitored for impact on student achievement using:

- FastBridge aReading and CBMreading benchmarks
  - CORE Literacy Phonics Screeners
  - Local common assessments
  - Teacher and student feedback
- 

## Requested Materials and Costs

To successfully launch the pilot, we propose the purchase of the following CAREI Morphology print materials:

- **(6) Complete Classroom Kit Series 1 @ \$810 each = \$4,860**
- **(6) Complete Classroom Kit Series 2 @ \$810 each = \$4,860**
- **(1) Complete Classroom Kit Series 3 @ \$810 each = \$810**
- **(5) Student Materials Kit Series 3 @ \$585 each = \$2,925**

**Total Estimated Cost: \$13,455**

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## Next Steps

1. **Approval** to move forward with a 3–5 grade pilot.
  2. **Order materials** in fall 2025 to ensure delivery early in the 2025–26 school year.
  3. **Professional development** session in the fall of 2025 for participating teachers, aligned with CAREI training and READ Act requirements.
  4. **Ongoing monitoring** of pilot effectiveness and student outcomes through PLCs, assessment data, and staff reflections.
  5. **Evaluation and scaling:** By spring 2026, review results to determine if the program should be expanded district-wide.
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## **Conclusion**

This pilot provides Saint Peter Public Schools with an opportunity to strengthen our Tier 1 reading instruction by addressing a key gap in morphological awareness. CAREI Morphology is a research-aligned, state-supported curriculum that will complement our existing literacy framework and help ensure our students meet the expectations of the Minnesota READ Act.

I recommend approval to proceed with this pilot beginning in the 2025–26 school year.



## ADDENDUM

**Regular Board Meeting  
Wednesday, September 17, 2025  
SPCC-Governor's Room  
5:00PM**

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### VII. ACTION ITEMS

<b>8. AGENDA ITEM #8</b>
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**Subject:** Consider Declaration of Obsolete and Outdated Equipment

**Action:** Requires a Motion

**Background:** Board Policy 802 - Disposition of Obsolete Equipment and Material provides direction to the school district on the disposition of obsolete and outdated equipment. This process is used on an as needed basis as equipment is removed from the operations of the district. Included in your materials for the meeting is a list of materials that are being recommended to be deemed obsolete. If approved, this allows the school district to dispose of equipment at auction that is no longer in use.

**Presentation:** Superintendent of Schools, Jon Graff

**Options/Recommendation:** I recommend your approval of declaring the list of equipment as presented as obsolete and outdated.



**Date: 8/21/2025**

**To: Superintendent, Jon Graff**

**Members of the School Board**

**From: Shea Roehrkasse**

**Re: Obsolete equipment**

The following items have reached the end of their usefulness to the district. I propose they be deemed obsolete and properly remove them from possession of Independent School District #508.

<b>Equipment (amount)</b>	<b>Model #</b>	<b>Serial #</b>
Dr. Dish & 2 Rebounders	06231	N/A
Toss Back Rebounder	N/A	N/A
Air Cat Volleyball Toss	N/A	N/A

**Return this form to your Principal or Supervisor to be presented to the School Board.**

*This equipment can be removed from your work space when the Board has approved its disposal at its regularly scheduled monthly meeting.*



## ADDENDUM

**Regular Board Meeting  
Wednesday, September 17, 2025  
SPCC-Governor's Room  
5:00PM**

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### VIII. INFORMATION ITEMS

<b>1. AGENDA ITEM #1</b>
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**Subject:** First Reading of Revisions to the Policy Manual

**Background:** The following policies were reviewed by the Policy Committee and are being brought forward for a first reading:

**Policy 516:** Student Medication and Telehealth

- MSBA updates include language around medication delivery systems and a reorganization of content/headings.
- The Policy Review Committee, in collaboration with District Nurse Rachel Fitch, recommends additional changes to the "Exclusions" section.

**Policy 621:** Literacy and the Read Act

- MSBA updates include additional Read Act requirements.

**Presentation:** Superintendent of Schools, Jon Graff  
Policy Review Committee

## **516 STUDENT MEDICATION AND TELEHEALTH**

~~[NOTE: The necessary provisions for complying with Minnesota Statutes, sections 121A.22, Administration of Drugs and Medicine, 121A.221, Possession and Use of Asthma Inhalers by Asthmatic Students, and 121A.222, Possession and Use of Nonprescription Pain Relievers by Secondary Students are included in this policy. The statutes do not regulate administration of drugs and medicine for students aged 18 and over or other nonprescription medications. Please note that section 121A.22 does not require school districts to apply the administration of medication rule to drugs or medicine used off school grounds, drugs or medicines used in connection with athletics or extra-curricular activities, and drugs and medicines that are used in connection with activities that occur before or after the regular school day.]~~

### **I. PURPOSE**

The purpose of this policy is to set forth the provisions that must be followed when administering nonemergency prescription medication to students at school.

### **II. GENERAL STATEMENT OF POLICY**

The school district acknowledges that some students may require prescribed drugs or medication or telehealth during the school day. The school district's licensed school nurse, trained health clerk, principal, or teacher will administer prescribed medications, except any form of medical cannabis, in accordance with law and school district procedures.

### **III. DRUG AND MEDICATION REQUIREMENTS**

**[NOTE: The June 2024 Model Policy 516 revisions included insertion of headings and rearrangement of paragraphs so that similar content is grouped together. School boards can choose whether to make these revisions.]**

#### A. Administration of Drugs and Medicine

1. The administration of medication or drugs at school requires a completed signed request from the student's parent. An oral request must be reduced to writing within two school days, provided that the school district may rely on an oral request until a written request is received.
2. Drugs and medicine subject to Minnesota Statutes, 121A.22 must be administered, to the extent possible, according to school board procedures that must be developed in consultation with:
  - a. with a licensed nurse, in a district that employs a licensed nurse under Minnesota Statutes, section 148.171;
  - b. with a licensed school nurse, in a district that employs a licensed school nurse licensed under Minnesota Rules, part 8710.6100;
  - c. with a public or private health-related organization, in a district that contracts with a public or private health or health-related organization, according to Minnesota Statutes, 121A.21; or
  - d. with the appropriate party, in a district that has an arrangement approved by the Commissioner of the Minnesota Department of Education, according to Minnesota Statutes, 121A.21.

~~[NOTE: Paragraph III.A.2 had appeared in a different spot in previous versions of this model policy. In June 2024, the paragraph is located here and is updated to reflect 2024 legislative changes.]~~

3. Exclusions

~~[Note: The provisions of III.A.3 are optional. The school board may choose to include or exclude any of the provisions specified. These exclusions appeared in previous versions of this model policy.]~~

The provisions on administration of drugs and medicine above do not apply to drugs or medicine that are:

- a. ~~purchased without a prescription;~~
- b. ~~used by a pupil who is 18 years old or older;~~
- c. ~~used in connection with services for which a minor may give effective consent;~~
- d. used in situations in which, in the judgment of the school personnel, including a licensed nurse, who are present or available, the risk to the pupil's life or health is of such a nature that drugs or medicine should be given without delay;
- e. ~~used off the school grounds;~~
- f. ~~used in connection with athletics or extracurricular activities;~~
- g. ~~used in connection with activities that occur before or after the regular school day;~~
- h. provided or administered by a public health agency to prevent or control an illness or a disease outbreak as provided under Minnesota law;
- i. prescription asthma or reactive airway disease medications can be self-administered by a student with an asthma inhaler if:
  - (1) the school district has received a written authorization each school year from the pupil's parent permitting the student to self-administer the medication;
  - (2) the inhaler is properly labeled for that student; and
  - (3) the parent has not requested school personnel to administer the medication to the student.

In a school that does not have a school nurse or school nursing services, the student's parent or guardian must submit written verification from the prescribing professional which documents that an assessment of the student's knowledge and skills to safely possess and use an asthma inhaler in a school setting has been completed.

If the school district employs a school nurse or provides school nursing services under another arrangement, the school nurse or other appropriate party must assess the student's knowledge and skills to safely possess and use an asthma inhaler in a school setting and enter into the student's school health record a plan to implement safe possession and use of asthma inhalers.

- j. epinephrine delivery systems~~auto-injectors~~, consistent with Minnesota Statutes, section 121A.2205, if the parent and prescribing medical professional annually inform the pupil's school in writing that
    - (1) the pupil may possess the epinephrine or
    - (2) the pupil is unable to possess the epinephrine and requires immediate access to epinephrine delivery systems ~~auto-injectors~~ that the parent provides properly labeled to the school for the pupil as needed.
- [NOTE: The 2025 Minnesota legislature replaced "auto-injectors" with "delivery systems" in Minnesota Statutes, sections 121A.22, 121A.2205, and 121A.2207.]**
- k. For the purposes of Minnesota Statutes, 121A.22, special health treatments and health functions, such as catheterization, tracheostomy suctioning, and gastrostomy feedings, do not constitute administration of drugs or medicine.
  - l. Emergency health procedures, including emergency administration of drugs and medicine are not subject to this policy.

**B. Prescription Medication**

1. An "Administering Prescription Medications" form must be completed annually (once per school year) and/or when a change in the prescription or requirements for administration occurs. Prescription medication as used in this policy does not include any form of medical cannabis as defined in Minnesota Statutes, section 152.22, subdivision 6.
2. Prescription medication must come to school in the original container labeled for the student by a pharmacist in accordance with law and must be administered in a manner consistent with the instructions on the label.
3. The school nurse may request to receive further information about the prescription, if needed, prior to administration of the substance.
4. Prescription medications are not to be carried by the student, but will be left with the appropriate school district personnel. Exceptions to this requirement are: prescription asthma medications self-administered with an inhaler (See Paragraph III.A.3(i) above), and medications administered as noted in a written agreement between the school district and the parent or as specified in an IEP (individualized education program), Section 504 plan, or IHP (individual health plan).
5. The school must be notified immediately by the parent or student 18 years old or older in writing of any change in the student's prescription medication administration. A new medical authorization or container label with new pharmacy instructions shall be required immediately as well.
6. The school nurse, or other designated person, shall be responsible for the filing of the Administering Prescription Medications form in the health records section of the student file. The school nurse, or other designated person, shall be responsible for providing a copy of such form to the principal and to other personnel designated to administer the medication.
7. For drugs or medicine used by children with a disability, administration may be as provided in the IEP, Section 504 plan or IHP.

~~[NOTE: This paragraph is moved to Paragraph III.A.3 above, where it is updated to reflect 2024 legislative changes.]~~

8. If the administration of a drug or medication described in this section requires the school district to store the drug or medication, the parent or legal guardian must inform the school if the drug or medication is a controlled substance. For a drug or medication that is not a controlled substance, the request must include a provision designating the school district as an authorized entity to transport the drug or medication for the purpose of destruction if any unused drug or medication remains in the possession of school personnel. For a drug or medication that is a controlled substance, the request must specify that the parent or legal guardian is required to retrieve the drug or controlled substance when requested by the school.

~~[NOTE: Starting in June 2024, the exceptions appear under Article III.A.3 above.]~~

C. Nonprescription Medication

A secondary student may possess and use nonprescription pain relief in a manner consistent with the labeling, if the school district has received written authorization from the student's parent or guardian permitting the student to self-administer the medication. The parent or guardian must submit written authorization for the student to self-administer the medication each school year. The school district may revoke a student's privilege to possess and use nonprescription pain relievers if the school district determines that the student is abusing the privilege. This provision does not apply to the possession or use of any drug or product containing ephedrine or pseudoephedrine as its sole active ingredient or as one of its active ingredients. Except as stated in this paragraph, only prescription medications are governed by this policy.

~~[NOTE: School districts should consult with licensed medical and nursing personnel to address whether nonprescription medications will be allowed at elementary schools and whether and under what conditions school personnel will participate in storing or administering nonprescription medications.]~~

D. Possession and Use of Epinephrine Delivery Systems Auto-Injectors

1. Definitions

- a. "Administer" means the direct application of an epinephrine delivery system to the body of an individual.
- b. "Epinephrine delivery system" means a medication product approved by the United States Food and Drug Administration that automatically delivers a single, premeasured dose of epinephrine to prevent or treat a life-threatening allergic reaction.
- c. "School" means a public school under Minnesota Statutes, section 120A.22, subdivision 4, or a nonpublic school, excluding a home school, under section 120A.22, subdivision 4, that is subject to the federal Americans with Disabilities Act.

2. At the start of each school year or at the time a student enrolls in school, whichever is first, a student's parent, school staff, including those responsible for student health care, and the prescribing medical professional must develop and implement an individualized written health plan for a student who is prescribed epinephrine auto-injectors/delivery systems that enables the student to:

~~a1.~~ \_\_\_\_ possess epinephrine delivery systems auto-injectors; or

~~b2.~~ \_\_\_\_ if the parent and prescribing medical professional determine the student is unable to possess the epinephrine, have immediate access to epinephrine delivery systems auto-injectors in close proximity to the student at all times during the instructional day.

For the purposes of this policy, “instructional day” is defined as eight hours for each student contact day.

**~~[NOTE: Minnesota law states that “the school board of the school district must define instructional day for the purposes of Minnesota Statutes, 121A.2205.” A sample definition appears above. School districts can create a definition that fits their circumstances.]~~**

The plan must designate the school staff responsible for implementing the student’s health plan, including recognizing anaphylaxis and administering epinephrine auto-injectorsdelivery systems when required, consistent with state law. This health plan may be included in a student’s Section 504 plan.

Districts and schools may obtain and possess epinephrine auto-injectorsdelivery systems to be maintained and administered by school personnel, including a licensed nurse, to a student or other individual if, in good faith, it is determined that person is experiencing anaphylaxis regardless of whether the student or other individual has a prescription for an epinephrine delivery system.auto-injector. The administration of an epinephrine delivery systemauto-injector in accordance with Minnesota Statutes, section 121A.2207 is not the practice of medicine.

~~Effective July 1, 2024, r~~Registered nurses may administer epinephrine auto-injectorsdelivery systems in a school setting according to a condition-specific protocol as authorized under Minnesota Statutes, section 148.235, subdivision 8. Notwithstanding any limitation in Minnesota Statutes, sections 148.171 to 148.285, licensed practical nurses may administer epinephrine auto-injectorsdelivery systems in a school setting according to a condition-specific protocol that does not reference a specific patient and that specifies the circumstances under which the epinephrine delivery systemauto-injector is to be administered, when caring for a patient whose condition falls within the protocol.

**~~[NOTE: The paragraph above was signed into law in May 2024. It is new model policy language.]~~**

A district or school may enter into arrangements with manufacturers of epinephrine auto-injectorsdelivery systems to obtain epinephrine auto-injectorsdelivery systems at fair-market, free, or reduced prices. A third party, other than a manufacturer or supplier, may pay for a school’s supply of epinephrine auto-injectorsdelivery systems.

The Commissioner of the Minnesota Department of Health must provide a district or school with a standing order for distribution of epinephrine delivery systems under Minnesota Statutes, sections 148.235, subdivision 8 and 151.37, subdivision 2.

**~~[NOTE: The 2025 Minnesota legislature amended Minnesota Statutes, section 121A.2207 to include the changes above.]~~**

E. Sunscreen

A student may possess and apply a topical sunscreen product during the school day while on school property or at a school-sponsored event without a prescription, physician’s note, or other documentation from a licensed health care professional. School personnel are not required to provide sunscreen or assist students in applying sunscreen.

F. Procedure regarding unclaimed drugs or medications.

1. The school district has adopted the following procedure for the collection and transport of any unclaimed or abandoned prescription drugs or medications remaining in the possession of school personnel in accordance with this policy. Before the transportation of any prescription drug or medication under this policy, the school district shall make a reasonable attempt to return the unused prescription drug or medication to the student's parent or legal guardian. Transportation of unclaimed or unused prescription drugs or medications will occur at least annually, but may occur more frequently at the discretion of the school district.
2. If the unclaimed or abandoned prescription drug is not a controlled substance as defined under Minnesota Statutes, section 152.01, subdivision 4, or is an over-the-counter medication, the school district will either designate an individual who shall be responsible for transporting the drug or medication to a designated drop-off box or collection site or request that a law enforcement agency transport the drug or medication to a drop-off box or collection site on behalf of the school district.
3. If the unclaimed or abandoned prescription drug is a controlled substance as defined in Minnesota Statutes, section 152.01, subdivision 4, the school district or school personnel is prohibited from transporting the prescription drug to a drop-off box or collection site for prescription drugs identified under this paragraph. The school district must request that a law enforcement agency transport the prescription drug or medication to a collection bin that complies with Drug Enforcement Agency regulations, or if a site is not available, under the agency's procedure for transporting drugs.

**IV. ACCESS TO SPACE FOR MENTAL HEALTH CARE THROUGH TELEHEALTH**

- A. Beginning October 1, 2024, to the extent space is available, the school district must provide an enrolled secondary school student with access during regular school hours, and to the extent staff is available, before or after the school day on days when students receive instruction at school, to space at the school site that a student may use to receive mental health care through telehealth from a student's licensed mental health provider. A secondary school must develop a plan with procedures to receive requests for access to the space.
- B. The space must provide a student privacy to receive mental health care.
- C. A student may use a school-issued device to receive mental health care through telehealth if such use is consistent with the district or school policy governing acceptable use of the school-issued device.
- D. A school may require a student requesting access to space under this section to submit to the school a signed and dated consent from the student's parent or guardian, or from the student if the student is age 16 or older, authorizing the student's licensed mental health provider to release information from the student's health record that is requested by the school to confirm the student is currently receiving mental health care from the provider. Such a consent is valid for the school year in which it is submitted.

**[NOTE: The Minnesota legislature enacted Article IV in the spring 2024.]**

**Legal References:** Minn. Stat. § 13.32 (Educational Data)  
Minn. Stat. § 121A.21 (School Health Services)  
Minn. Stat. § 121A.216 (Access to Space for Mental Health Care through Telehealth)  
Minn. Stat. § 121A.22 (Administration of Drugs and Medicine)

Minn. Stat. § 121A.2205 (Possession and Use of Epinephrine [Auto-Injectors](#)[Delivery systems](#); Model Policy)  
Minn. Stat. § 121A.2207 (Life-Threatening Allergies in Schools; Stock Supply of Epinephrine [Auto-Injectors](#)[Delivery systems](#))  
Minn. Stat. § 121A.221 (Possession and Use of Asthma Inhalers by Asthmatic Students)  
Minn. Stat. § 121A.222 (Possession and Use of Nonprescription Pain Relievers by Secondary Students)  
Minn. Stat. § 121A.223 (Possession and Use of Sunscreen)  
Minn. Stat. § 148.171 (Definitions; Title)  
Minn. Stat. § 151.212 (Label of Prescription Drug Containers)  
Minn. Stat. § 152.01 (Definitions)  
Minn. Stat. § 152.22 (Definitions)  
Minn. Stat. § 152.23 (Limitations)  
Minn. Rule 8710.6100 (School Nurse)  
20 U.S.C. § 1400 *et seq.* (Individuals with Disabilities Education Act)  
29 U.S.C. § 794 *et seq.* (Rehabilitation Act of 1973, § 504)

**Cross References:** MSBA/MASA Model Policy 418 (Drug-Free Workplace/Drug-Free School)

## 621 LITERACY AND THE READ ACT

~~[NOTE: By the 2026-2027 school year, the school district must provide evidence-based reading instruction through a focus on student mastery of the foundational reading skills of phonemic awareness, phonics, and fluency, as well as the development of oral language, vocabulary, and reading comprehension skills. Students must receive evidence-based instruction that is proven to effectively teach children to read, consistent with Minnesota Statutes, sections 120B.118 to 120B.124.]~~

**[NOTE: The 2024 Minnesota legislature renumbered the Read Act statutes to 120B.118 and 120B.119.]**

### I. PURPOSE

This policy aligns with Minnesota law established in the Read Act and on other topics related to reading.

### II. GENERAL STATEMENT OF POLICY

The school district recognizes the centrality of reading in a student's educational experience.

### III. DEFINITIONS

- A. "Evidence-based" means the instruction or item described is based on reliable, trustworthy, and valid evidence and has demonstrated a record of success in increasing students' reading competency in the areas of phonological and phonemic awareness, phonics, vocabulary development, reading fluency, and reading comprehension. Evidence-based literacy instruction is explicit, systematic, and includes phonological and phonemic awareness, phonics and decoding, spelling, fluency, vocabulary, oral language, and comprehension that can be differentiated to meet the needs of individual students. Evidence-based instruction does not include the three-cueing system, as defined in subdivision 16.
- B. "Fluency" means the ability of students to read text accurately, automatically, and with proper expression.
- C. "Foundational reading skills" includes phonological and phonemic awareness, phonics and decoding, and fluency. Foundational reading skills appropriate to each grade level must be mastered in kindergarten, grade 1, grade 2, and grade 3. Struggling readers in grades 4 and above who do not demonstrate mastery of grade-level foundational reading skills must continue to receive explicit, systematic instruction to reach mastery.
- D. "Literacy specialist" means a person licensed by the Professional Educator Licensing and Standards Board as a teacher of reading, a special education teacher, or a kindergarten through grade 6 teacher, who has completed professional development approved by the Minnesota Department of Education (MDE) in structured literacy. A literacy specialist employed by the department under Minnesota Statutes, section 120B.123, subdivision 7, or by a district as a literacy lead, is not required to complete the approved training before August 30, 2025.
- E. "Literacy lead" means a literacy specialist with expertise in working with educators as adult learners. A district literacy lead must support the district's implementation of the Read Act; provide support to school-based coaches; support the implementation of structured literacy, interventions, curriculum delivery, and teacher training; assist with

the development of personal learning plans; and train paraprofessionals and other support staff to support classroom literacy instruction. A literacy lead may be employed by one district, jointly by two or more districts, or may provide services to districts through a partnership with the regional service cooperatives or another district.

- F. "Multitiered system of support" or "MTSS" means a systemic, continuous improvement framework for ensuring positive social, emotional, behavioral, developmental, and academic outcomes for every student. The MTSS framework provides access to layered tiers of culturally and linguistically responsive, evidence-based practices and relies on the understanding and belief that every student can learn and thrive. Through an MTSS at the core (Tier 1), supplemental (Tier 2), and intensive (Tier 3) levels, educators provide high quality, evidence-based instruction and intervention that is matched to a student's needs; progress is monitored to inform instruction and set goals and data is used for educational decision making.
- G. "Oral language," also called "[spoken-expressive language](#)," [or "receptive language,"](#) includes speaking and listening, and consists of five components: phonology, morphology, syntax, semantics, and pragmatics.
- H. "Phonemic awareness" means the ability to notice, think about, and manipulate individual sounds in spoken syllables and words.
- I. "Phonics instruction" means the explicit, systematic, and direct instruction of the relationships between letters and the sounds they represent and the application of this knowledge in reading and spelling.
- J. "Progress monitoring" means using data collected to inform whether interventions are working. Progress monitoring involves ongoing monitoring of progress that quantifies rates of improvement and informs instructional practice and the development of individualized programs using state-approved screening that is reliable and valid for the intended purpose.
- K. "Reading comprehension" means a function of word recognition skills and language comprehension skills. It is an active process that requires intentional thinking during which meaning is constructed through interactions between the text and reader. Comprehension skills are taught explicitly by demonstrating, explaining, modeling, and implementing specific cognitive strategies to help beginning readers derive meaning through intentional, problem-solving thinking processes.
- L. "Structured literacy" means an approach to reading instruction in which teachers carefully structure important literacy skills, concepts, and the sequence of instruction to facilitate children's literacy learning and progress. Structured literacy is characterized by the provision of systematic, explicit, sequential, and diagnostic instruction in phonemic awareness, phonics, fluency, vocabulary and oral language development, and reading comprehension. [This approach is consistent with the principles identified in the science of reading and is designed to ensure all students develop strong foundational literacy skills.](#)
- M. "Three-cueing system," also known as "meaning structure visual (MSV)," means a method that teaches students to use meaning, structure and syntax, and visual cues when attempting to read an unknown word.
- N. "Vocabulary development" means the process of acquiring new words. A robust vocabulary improves all areas of communication, including listening, speaking, reading, and writing. Vocabulary growth is directly related to school achievement and is a strong predictor for reading success.

#### **IV. READING SCREENER; PARENT NOTIFICATION AND INVOLVEMENT**

- A. The school district must administer an approved ~~evidence-based~~ reading screener to students in kindergarten through grade 3 within the first six weeks of the school year, by February 15 each year, and again within the last six weeks of the school year. The screener must be one of the screening tools approved by MDE.
- B. The school district must identify any screener it uses in the district's annual literacy plan, and submit screening data with the annual literacy plan by June 15.
- C. Schools, ~~at least biannually~~ after administering each screener, must follow the language access plan under Minnesota Statutes, section 123B.32 and ~~must~~ give the parent of each student who is not reading at or above grade level ~~timely~~ information from the screener about:
  1. the student's reading proficiency as measured by a screener approved by MDE;
  2. reading-related services currently being provided to the student and the student's progress; and
  3. strategies for parents to use at home in helping their student succeed in becoming grade-level proficient in reading in English and in their native language.
- D. For students enrolled in dual language immersion programs, the school district must measure the student's reading proficiency in English or in the program's partner language, if available, according to Article V below. Following its language access plan under Minnesota Statutes, section 123B.32, the school district must notify families with timely information about students' reading proficiency, including how the student's reading proficiency is assessed, any reading-related services or supports provided to the student and the student's progress, and strategies for families to use at home in helping students succeed in becoming grade-level proficient in reading in English or the partner language. The dual language immersion program may provide information about national research on reading proficiency for students in dual language immersion programs in the parent notification.
- E. The school district may not use this section to deny a student's right to a special education evaluation.

## V. IDENTIFICATION AND REPORT

- A. Students enrolled in kindergarten, grade 1, grade 2, and grade 3, including multilingual learners and students receiving special education services, and students enrolled in dual language immersion programs, must be universally screened for mastery of foundational reading skills, including phonemic awareness, phonics, decoding, fluency, oral language, and for characteristics of dyslexia as measured by a screening tool approved by MDE. The screening for characteristics of dyslexia may be integrated with universal screening for mastery of foundational skills and ~~oral-expressive or receptive~~ language mastery. The screening tool used must be a valid and reliable universal screener that is highly correlated with foundational reading skills. For students reading at grade level, beginning in the winter of grade 2, the oral reading fluency screener may be used to assess reading difficulties, including characteristics of dyslexia, without requiring a separate screening of each subcomponent of foundational reading skills.
- B. The school district must submit data on student performance in kindergarten, grade 1, grade 2, and grade 3 on foundational reading skills, including phonemic awareness, phonics, decoding, fluency, and oral language to MDE in the annual local literacy plan submission due on June 15.
- C. For students enrolled in dual language immersion programs:

1. if students are screened in the partner language, they must be screened at the same interval as the screenings in English under paragraph A above;
2. if the program provides instruction in foundational reading skills in English, the students receiving that instruction must be screened in English;
3. if the program provides instruction in foundational reading skills in the partner language, the students receiving that instruction must be screened in the partner language;
4. if no screener is available in the partner language, the school district must identify how students' reading proficiency is assessed and how the school district determines and provides targeted reading instruction in the partner language and supports to students identified as needing additional support in developing mastery of foundational reading skills; and
5. the partner language screening tool must be approved by the school district for kindergarten through grade 3 students.

D. Students in grades 4 and above, including multilingual learners and students receiving special education services, who ~~do not demonstrate mastery of foundational reading skills, including phonemic awareness, phonics, decoding, fluency, and oral language, are not reading at grade level~~ must be screened for reading difficulties, including characteristics of dyslexia, using a screening tool approved by MDE ~~for characteristics of dyslexia~~ and must continue to receive evidence-based instruction, interventions, and progress monitoring until the students achieve grade-level proficiency. A parent, in consultation with a teacher, may opt a student out of the literacy screener if the parent and teacher decide that continuing to screen would not be beneficial to the student. In such limited cases, the student must continue to receive progress monitoring and literacy interventions.

E. Reading screeners in English, and in the predominant languages of school district students where practicable, must identify and evaluate students' areas of academic need related to literacy. The school district also must monitor the progress and provide reading instruction appropriate to the specific needs of multilingual learners. The school district must use an approved, developmentally appropriate, and culturally responsive screener and annually report summary screener results to the MDE Commissioner ("Commissioner") by June 15 in the form and manner determined by the Commissioner.

F. The school district must include in its local literacy plan a summary of the district's efforts to screen, identify, and provide interventions to students who demonstrate characteristics of dyslexia as measured by a screening tool approved by MDE. With respect to students screened or identified under paragraph (a), the report must include:

1. a summary of the school district's efforts to screen for characteristics of reading difficulties, including dyslexia;
2. the number of students universally screened for that reporting year;
3. the number of students demonstrating characteristics of dyslexia for that year; and
4. an explanation of how students identified under this subdivision are provided with alternate instruction and interventions under Minnesota Statutes, section 125A.56, subdivision 1.

## VI. INTERVENTION

- A. For each student identified under the screening identification process, the school district shall provide [aligned and targeted](#) reading intervention to accelerate student growth and reach the goal of reading at or above grade level by the end of the current grade and school year.
- B. The school district must implement progress monitoring, as defined in Minnesota Statutes, section 120B.119, for a student not reading at grade level.
- C. The school district must use evidence-based curriculum and intervention materials at each grade level that are designed to ensure student mastery of phonemic awareness, phonics, vocabulary development, reading fluency, and reading comprehension. Starting July 1, 2023, if the school district purchases new literacy curriculum, or literacy intervention or supplementary materials, the curriculum or materials must be evidence-based as defined in Minnesota Statutes, section 120B.119.

**[NOTE: Starting in the 2026-2027 school year, a school district must use only evidence-based literary interventions. The 2025 Minnesota legislature amended Minnesota Statutes, section 120B.12, subdivision 3, to delay the 2025-26 requirement for one school year.]**

- D. If a student does not read at or above grade level by the end of the current school year, the school district must continue to provide [aligned and targeted](#) reading intervention [as defined by the MTSS framework](#) until the student reads at grade level. School district intervention methods shall encourage family engagement and, where possible, collaboration with appropriate school and community programs that specialize in evidence-based instructional practices and measure mastery of foundational reading skills, including phonemic awareness, phonics, decoding, fluency, and oral language.
- E. By the 2025-2026 school year, intervention programs must be taught by an intervention teacher or special education teacher who has successfully completed training in evidence-based reading instruction approved by MDE. Intervention may include but is not limited to requiring student attendance in summer school, intensified reading instruction that may require that the student be removed from the regular classroom for part of the school day, extended-day programs, or programs that strengthen students' cultural connections.
- F. The school district must determine the format of the personal learning plan in collaboration with the student's educators and other appropriate professionals. The school must develop the learning plan in consultation with the student's parent or guardian. The personal learning plan must include targeted instruction that is evidence-based and ongoing progress monitoring, and address knowledge gaps and skill deficiencies through strategies such as specific exercises and practices during and outside of the regular school day, group interventions, periodic assessments or screeners, and reasonable timelines. The personal learning plan may include grade retention, if it is in the student's best interest; a student may not be retained solely due to delays in literacy or not demonstrating grade-level proficiency. A school must maintain and regularly update and modify the personal learning plan until the student reads at grade level. This paragraph does not apply to a student under an individualized education program.

## **VII. LOCAL LITERACY PLAN**

- A. The school district must adopt a local literacy plan to have every child reading at or above grade level every year beginning in kindergarten and to support multilingual learners and students receiving special education services in achieving their individualized reading goals. The school district must update and submit the plan to the Commissioner by June 15 each year. The plan must be consistent with the Read Act, and include the following:

1. a process to assess students' foundational reading skills, oral language, and level of reading proficiency and the screeners used, by school site and grade level, under Minnesota Statutes, section 120B.123;
2. a process to notify and involve parents;
3. a description of how schools in the school district will determine the targeted reading instruction that is evidence-based and includes an intervention strategy for a student and the process for intensifying or modifying the reading strategy in order to obtain measurable reading progress;
4. evidence-based intervention methods for students who are not reading at or above grade level and progress monitoring to provide information on the effectiveness of the intervention;
5. identification of staff development needs, including a plan to meet those needs;
6. the curricula used by school site and grade level and, if applicable, the district plan and timeline for adopting evidence-based curricula and materials starting in the 2025-2026 school year;
7. a statement of whether the school district has adopted an MTSS framework;
8. student data using the measures of foundational literacy skills and mastery identified by MDE for the following students:
  - a. students in kindergarten through grade 3;
  - b. students who demonstrate characteristics of dyslexia; and
  - c. students in grades 4 to 12 who are identified as not reading at grade level; and
9. the number of teachers and other staff that have completed training approved by the department;
10. the number of teachers and other staff proposed for training in structured literacy;
11. how the district used funding provided under the Read Act to implement the requirements of the Read Act;
12. beginning as soon as practicable after the end of fiscal year 2026, how the district used literacy aid funding received under Minnesota Statutes, section 124D.98; and
13. beginning on December 31, 2025, for a district with a dual language immersion program:
  - a. the program's partner language;
  - b. grade levels included in the program;
  - c. the language used to screen students' foundational reading skills;
  - d. the percentage of grade 3 students taking the Minnesota Comprehensive Assessments; and

- e. the number of students in the program in grades 4 to 12 who are identified as not reading at grade level.
- B. Annually by June 15, the school district must post its literacy plan on the official school district website and submit it to the Commissioner using the template developed by the Commissioner beginning June 15, 2024.
- C. The school district must use a streamlined template developed by the Commissioner for local literacy plans that meets the requirements of Minnesota Statutes, section 120B.12, subdivision 4a, and requires all reading instruction and teacher training in reading instruction to be evidence-based.

## VIII. STAFF TRAINING

- A. Beginning July 1, 2024, a school district must provide access to the training required under Minnesota Statutes, section 120B.123, subdivision 5. The district must provide training from a menu of approved evidence-based training programs to the following teachers and staff by July 1, 2026: to:
  - 1. reading intervention teachers working with students in kindergarten through grade 12;
  - 2. all classroom teachers of students in kindergarten through grade 3 and children in prekindergarten programs;
  - 3. kindergarten through grade 12 special education teachers responsible for foundational reading instruction;
  - 4. curriculum directors;
  - 5. instructional support staff, contractors, and volunteers who assist in providing reading interventions under the oversight and monitoring of a trained licensed teacher; who provide reading instruction; and
  - 6. employees who select literacy instructional materials for a district; and
  - 7. teachers holding English as a second language teaching licenses.
- B. The school district must provide training from a menu of approved evidence-based training programs to the following teachers by July 1, 2027:
  - 1. teachers who provide foundational reading instruction to students in grades 4 to 12;
  - 2. teachers who provide instruction to students in a state-approved alternative program; and
  - 3. teachers who provide instruction to students in dual language immersion programs.

all reading intervention teachers, literacy specialists, and other teachers and staff identified in Minnesota Statutes, section 120B.12, subdivision 1, paragraph (b), by July 1, 2025; and by July 1, 2027, to other teachers in the school district, prioritizing teachers who work with students with disabilities, English learners, and students who qualify for the graduation incentives program under Minnesota Statutes, section 124D.68. The Commissioner may grant a school district an extension to these deadlines.
- C. By August 30, 2025, the school district must employ or contract with a literacy lead, or be actively supporting a designated literacy specialist through the process of becoming

a literacy lead. The school board may satisfy the requirements of this subdivision by contracting with another school board or cooperative unit under Minnesota Statutes, section 123A.24 for the services of a literacy lead by August 30, 2025. The school district literacy lead must collaborate with school district administrators and staff to support the school district's implementation of requirements under the Read Act.

D. Training provided by the following may satisfy the professional development requirements under this Article:

1. a certified trained facilitator; or

2. a training program that MDE has determined meets the professional development requirements under the Read Act.

## **IX. STAFF DEVELOPMENT**

A. The school district must provide training programs on evidence-based reading instruction to teachers and instructional staff in accordance with subdivision 1, paragraph (b). The training must include teaching in the areas of phonemic awareness, phonics, vocabulary development, reading fluency, reading comprehension, and culturally and linguistically responsive pedagogy.

B. The school district shall use the data under Article V. above to identify the staff development needs so that:

1. elementary teachers are able to implement explicit, systematic, evidence-based instruction in the five reading areas of phonemic awareness, phonics, fluency, vocabulary, and comprehension with emphasis on mastery of foundational reading skills as defined in Minnesota Statutes, section 120B.119 and other literacy-related areas including writing until the student achieves grade-level reading and writing proficiency;

2. elementary teachers have sufficient training to provide students with evidence-based reading and oral language instruction that meets students' developmental, linguistic, and literacy needs using the intervention methods or programs selected by the school district for the identified students;

3. licensed teachers employed by the school district have regular opportunities to improve reading and writing instruction;

4. licensed teachers recognize students' diverse needs in cross-cultural settings and are able to serve the oral language and linguistic needs of students who are multilingual learners by maximizing strengths in their native languages in order to cultivate students' English language development, including oral academic language development, and build academic literacy; and

5. licensed teachers are well trained in culturally responsive pedagogy that enables students to master content, develop skills to access content, and build relationships.

C. The school district must provide staff in early childhood programs sufficient training to provide children in early childhood programs with explicit, systematic instruction in phonological and phonemic awareness; oral language, including listening comprehension; vocabulary; and letter-sound correspondence.

## **X. LITERACY INCENTIVE AID USES**

The school district must use its literacy incentive aid to ~~support implementation of evidence-based reading instruction~~ meet the requirements and goals adopted in the school district's local

literacy plan. The following are eligible uses of literacy incentive aid:

1. ~~training for kindergarten through grade 3 teachers, early childhood educators, special education teachers, reading intervention teachers working with students in kindergarten through grade 12, curriculum directors, and instructional support staff that provide reading instruction, on using evidence-based screening and progress monitoring tools;~~
2. ~~evidence-based training using a training program approved by MDE;~~
3. ~~employing or contracting with a literacy lead, as defined in Minnesota Statutes, section 120B.119;~~
4. ~~materials, training, and ongoing coaching to ensure reading interventions under Minnesota Statutes, section 125A.56, subdivision 1, are evidence-based; and costs of substitute teachers to allow teachers to complete required training during the teachers' contract day.~~

**[NOTE: The 2025 Minnesota legislature amended Minnesota Statutes, section 124D.98 to enact these changes.]**

**Legal References:** Minn. Stat. § 120B.119 (Read Act Definitions)  
Minn. Stat. § 120B.12 (Read Act Goal and Interventions)  
Minn. Stat. § 120B.123 (Read Act Implementation)  
Minn. Stat. § 123A.24 (Withdrawing from a Cooperative Unit; Appealing Denial of Membership)  
Minn. Stat. § 124D.68 (Graduation Incentives Program)  
Minn. Stat. § 124D.98 (Literacy Incentive Aid)  
Minn. Stat. § 125A.56 (Alternate Instruction Required before Assessment Referral)

**Cross References:** None



## ADDENDUM

### REGULAR BOARD MEETING Wednesday, September 17, 2025 SPCC-Governor's Room 5:00Pm

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#### VIII. INFORMATION ITEMS

<b>2. AGENDA ITEM #2</b>
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**Subject:** Quarterly Fund Balance Tracker

**Background:** The "Quarterly Fund Balance Tracker" identifies major budget variations in terms of expenditures and revenues. Changes in these two categories are tracked July to September, October to December, January to March and April to June. These changes are shared monthly with the Business Committee and on a regular basis with the full School Board.

**Presentation:** Superintendent of Schools, Jon Graff  
Business Manager, Megan Gracia

**FY26 Quarterly Fund Balance Tracker**  
**Adjustments Identified in Quarter 1 - July-September**  
**Updated 9.8.25**

FY26 Beginning Unassigned General Fund Balance	5,530,742
FY26 Budgeted Unassigned General Fund Revenue	28,059,830
FY26 Budgeted Unassigned General Fund Expenses	28,108,485
FY26 Budgeted Unassigned General Fund Transfers	(100,000)
FY26 Budgeted Ending Unassigned General Fund Balance	<u>5,382,087</u>
	(69.9 days)

**Unassigned General Fund Changes - Quarter 1**

**Revenue Adjustments**

1	2025 Legislative Impacts (SPED Transportation Reimb.)	(36,796)
2	Habitat Grant Revenue	99,999
3	FY26 Budget Adjustments - True up to Actuals	628
4	Enrollment Adjustment - 29 Students Over Budget Estimates	290,000
<b>Total Quarter 1 Revenue Adjustments</b>		<b>353,831</b>

**Expense Adjustments**

1	ADSIS Positions - 2 Behavior & 1 Reading Interventionist	(107,283)
2	Oshawa Learning Academy - Behavior Interventionist	(35,761)
3	Literacy Aid - Shift funds to cover Jana Sykora (Literacy Lead)	5,000
4	<a href="#">MA Funds - Shift funds to cover Nurses/Health Aides</a>	50,000
5	True North Consulting Partners	(7,200)
6	2025 Legislative Impacts (Compensatory, Student Support Personnel, School Library)	237,374
7	Habitat Grant Expenditures	(99,999)
8	FY26 Budget Adjustments - True up to Actuals	(3,911)
<b>Total Quarter 1 Expense Adjustments</b>		<b>38,220</b>

**Total Net Quarter 1 Adjustments** 392,051

**Adjusted FY26 Anticipated Ending Unassigned General Fund Balance** 5,774,138

<b>Adjusted Unassigned General Fund Expenditures</b>	28,146,704.7
<b>Unassigned General Fund Expenses/Day</b>	77,114.3
<b>Unassigned General Fund Balance</b>	5,774,138.1
<b>30 Day Expenditure Target</b>	2,313,427.8
<b>Estimated Days of Operation</b>	74.9

**Note:**

Numbers in ( ) REDUCE unassigned general fund balance

Numbers that are positive (no parentheses) INCREASE unassigned general fund balance

**Enrollment Comparisons**  
**FY26ADP vs FY26 YTD**  
**9/8/2025**

	<u>FY26ADP</u>	<u>FY26 Enrollment 9.8.25</u>	<u>Difference</u>
<b>In-Seat</b>			
EC	38.00	38	-
KG	130.00	133	3.00
1	129.04	126	(3.04)
2	156.68	145	(11.68)
3	146.54	152	5.46
4	156.08	153	(3.08)
5	136.87	138	1.13
6	146.36	154	7.64
7	147.01	150	2.99
8	157.24	162	4.76
9	170.02	176	5.98
10	160.82	164	3.18
11	175.78	180	4.22
12	174.07	185	10.93
	<u>2,024.51</u>	<u>2,056.00</u>	<u>31.49</u>
<b>Rockbend</b>			
9	0	0	-
10	0	2	2.00
11	5	2	(3.00)
12	10	9	(1.00)
	<u>15.00</u>	<u>13</u>	<u>(2.00)</u>
<b>Tuition-Out</b>			
Tuition EC	0.00	0	-
Tuition K	0.00	0	-
Tuition 1-3	5.93	5.93	-
Tuition 4-6	6.20	6.2	-
Tuition 7-12	14.54	14.54	-
	<u>26.67</u>	<u>26.67</u>	<u>-</u>
<b>Total Enrollment</b>	<u><u>2,066.18</u></u>	<u><u>2,095.67</u></u>	<u><u>29.49</u></u>
			0.00