

Regular Meeting and Work Session  
Monday, August 18, 2025 5:00 PM

District Office Training Room  
West St. Paul/Mendota Heights/Eagan Area  
Schools  
1897 Delaware Avenue  
Mendota Heights, Minnesota 55118

## Agenda

1. Call Meeting to Order and Recite Pledge of Allegiance - 5:00 p.m.  
**Presenter:** Sarah Larsen, Chair
2. Approval of the Agenda  
**Presenter:** Sarah Larsen, Chair
3. Approval of the Consent Agenda  
**Presenter:** Sarah Larsen, Chair
  - 3.A. Approval of Minutes of the August 4, 2025 Regular School Board Meeting
  - 3.B. Approval of Personnel Recommendations
  - 3.C. Administrative Review of Policy 412, Expense Reimbursement
  - 3.D. Administrative Review of Policy 427, Workload Limits for Certain Special Education Teachers
  - 3.E. Final Reading of Policy 106, Equity
  - 3.F. Approval of June 2025 Wire Transfers Report
4. Comments to the School Board - 5:05 p.m.  
**Presenter:** Sarah Larsen, Chair
5. Curriculum Report - Math Update - 5:10 p.m.  
**Presenter:** Cari Jo Drewitz, Director of Curriculum, Instruction & Assessment
6. First Reading of Policy 527, Student Use and Parking of Motor Vehicles; Patrols, Inspections, and Searches - 6:20 p.m.  
**Presenter:** Peter Olson-Skog, Superintendent
7. First Reading of Policy 534, Unpaid Meal Charges - 6:30 p.m.  
**Presenter:** Mark Fortman, Director of Operations
8. First Reading of Policy 721, Uniform Guidance Policy Regarding Federal Revenue Sources - 6:40 p.m.  
**Presenter:** Scott LeSage, Director of Finance
9. Adjournment - 6:50 p.m.  
**Presenter:** Sarah Larsen, Chair

School District 197  
West St. Paul-Mendota Heights-Eagan Area Schools  
Regular Meeting  
Monday, August 4, 2025  
Mendota Heights City Hall, Council Chambers

A meeting of the School Board of Independent School District 197 was held on Monday, August 4, 2025 beginning at 6:00 p.m. pursuant to due notice.

The meeting was called to order by current Chair Larsen at 6:00 p.m. The following School Board members were present: Tim Aune, Sarah Larsen, Byron Schwab, Morgan Steele, Jon Vaupel and Randi Walz. Board members not present: Marcus Hill. Superintendent Peter Olson-Skog was present.

Also present for the meeting were: Peter Mau, Assistant Superintendent; Cari Jo Drewitz, Director of Curriculum, Instruction, and Assessment; Sara Lein, Director of Special Education; Tye Michaels, Director of Human Resources; Mark Fortman, Director of Operations; and Lisa Grathen, Director of Community Education.

**Agenda**

*It was moved by Mr. Schwab and seconded by Ms. Walz to approve the agenda as presented.*

*Aye: Tim Aune, Sarah Larsen, Byron Schwab, Morgan Steele, Jon Vaupel, Randi Walz. Nay: none.*

*The motion carried (6-0).*

**Consent Agenda**

Item 4C, Approval of Policy Changes to Reflect New Statutory Requirements, was removed from the Consent Agenda and added to the main agenda.

*It was moved by Ms. Steele and seconded by Mr. Aune to approve the consent agenda items as amended:*

- Approval of the June 16, 2025 School Board Regular Meeting Minutes
- Approval of Personnel Recommendations
- ~~Approval of Policy Changes to Reflect New Statutory Requirements~~
- Second Reading of Policy 106, Equity
- Approval of May 2025 Accounts Payable Report
- Approval of May 2025 Treasurer's Report

*Aye: Tim Aune, Sarah Larsen, Byron Schwab, Morgan Steele, Jon Vaupel, Randi Walz. Nay: none.*

*The motion carried (6-0).*

**Listening Session Report**

No one attended the listening session.

**Superintendent's Report**

This summer, students across School District 197 participated in enriching programs like Summer Stars Academy, Minds in the Middle, and a new adaptive water-skiing event, all made possible by dedicated staff.

The district also welcomed several new leaders, including Dr. Jess Cabak as principal at Two Rivers High School and interim principals at Garlough and Somerset Elementary Schools. Finally, Superintendent Olson-Skog expressed deep gratitude to retiring Executive Assistant Mary Amidon and warmly welcomed Britini Osmonson as her successor.

**Approval of Governmental Lease-Purchase Agreement for 16 “Mini” Blue Bird Buses**

To support safe and reliable student transportation, the School District will acquire 16 new mini Blue Bird buses through a lease-purchase financing agreement totaling \$1,873,781 at a 3.31% interest rate. Thirteen buses are expected to arrive in August 2025, with the remaining three delivered by December 2025. This approach, approved within the current budget, allows the district to modernize its fleet while spreading costs across multiple budget cycles.

*It was moved by Mr. Vaupel and seconded by Mr. Aune to approve the Governmental Lease-Purchase Agreement for 16 “Mini” Blue Bird Buses as presented.*

*Aye: Tim Aune, Sarah Larsen, Byron Schwab, Morgan Steele, Jon Vaupel, Randi Walz. Nay: none.*

*The motion carried (6-0).*

**Presentation of 2025-2026 School Board Building and Committee Assignments**

The FY 25-26 School Board committee and building assignments were presented. Changes will be noted on the District 197 website.

**Summary of FY 24-25 Superintendent Evaluation**

Board Director Byron Schwab presented a summary of the FY 24-25 Superintendent evaluation. The ISD 197 seven school board directors completed an annual evaluation of Superintendent Peter Olson-Skog in June of 2025. Preliminary results were reported and discussed with the Board and Superintendent during a closed session on June 16, 2025. The evaluation rubric consists of 5 Components. Each component has 3 to 5 competencies (a total of 21) that are rated Developing, Proficient, Accomplished, Distinguished or Not Demonstrated. Each competency can have 4 to 19 benchmarks (a total of 188). The board rated Dr. Olson-Skog Distinguished in all 5 Components: Purposeful Community, Managing Change, Focus of Leadership, Management, and Superintendent and Board Relations.

Some highlighted strengths in the board's feedback for the superintendent included strong communication, creating a welcoming and inclusive culture, proactive and prudent fiscal leadership with strategic use of resources, and being vision-driven and student-centered. While the superintendent's goals for the upcoming year will be finalized this fall, areas Dr. Olson-Skog would like to focus on include a broader outreach to under-represented families, continued improvement in the focus areas established by the board in the strategic framework, and strategic attention to State and Federal revenue and mandates.

**Adjournment**

*It was moved by Mr. Schwab and seconded by Ms. Steele to adjourn the meeting at 6:28 p.m.*

*Aye: Tim Aune, Sarah Larsen, Byron Schwab, Morgan Steele, Jon Vaupel, Randi Walz. Nay: none.*

*The motion carried (6-0).*

The next regularly scheduled School Board meeting of Independent School District 197 will be Monday, August 18, 2025 at 5:00 p.m. It will be held in the School District 197 District Office Training Room, 1897

Delaware Avenue, Mendota Heights. *Please refer to the district website for possible changes to any meeting times/locations.*

Upon approval by the School Board, official minutes will be available at the District Office, 1897 Delaware Avenue, Mendota Heights, and on the district website. The full meeting materials are available for public inspection at the administrative offices of the school district and on the district website.

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Sarah Larsen  
School Board Chair

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Jon Vaupel  
School Board Clerk



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[www.isd197.org](http://www.isd197.org)

TO: School District 197 School Board Members

FROM: Tye Michaels, Director of Human Resources

DATE: August 18, 2025

SUBJECT: PERSONNEL RECOMMENDATIONS

The following personnel items are recommended for approval on August 18, 2025, at the School Board Meeting.

#### **Licensed Employment**

- Davies, Carlie, 1.0 FTE Special Education Teacher at Somerset Elementary, at a salary of \$48,237 effective August 25, 2025.
- Galatowitsch, Sidney, 1.0 FTE Social Studies Teacher at Two Rivers High School, at a salary of \$53,018 effective August 25, 2025.
- Glasford, Samuel, 1.0 FTE EL Teacher at Friendly Hills Middle School, at a salary of \$53,707 effective August 25, 2025.
- Hamilton, Micheal, 1.0 FTE Science Teacher at Two Rivers High School, at a salary of \$85,505 effective August 25, 2025.
- Hansel, Angela, 1.0 FTE School Health Professional at Two Rivers High School, at a salary of \$48,833 effective August 25, 2025.
- Henrichs, Erika, 1.0 FTE Kindergarten Teacher, Mendota Elementary, at a salary of \$48,237 effective August 25, 2025.
- Lawrenz, Callie, 1.0 FTE Language Arts Teacher at Two Rivers High School, at a salary of \$48,484 effective August 25, 2025.
- Soler, Lillie, 1.0 FTE Special Education Teacher at Somerset Elementary School, at a salary of \$49,218 effective August 25, 2025.
- Stevenson, Grace, 1.0 FTE Social Studies Teacher at Two Rivers High School, at a salary of \$48,237 effective August 25, 2025.
- Villalobos, Lindsay, 1.0 FTE Media Specialist at Friendly Hills Middle School and Heritage Middle School, at a salary of \$96,656 effective August 25, 2025.

#### **Non-Licensed Resignation, Retirement, Termination**

- Cox, Madaline - Bus Monitor, Transportation, resignation effective July 18, 2025.
- Holter, Bridgett - Paraprofessional, Moreland, resignation effective August 6, 2025.
- Troolin, Amanda - Supervisory and SAC Paraprofessional, Pilot Knob, resignation effective August 15, 2025

TO: School Board Members

FROM: Peter Olson-Skog, Superintendent

DATE: August 18, 2025

SUBJECT: Review of Policy 412 – Expense Reimbursement

**BACKGROUND:**

An administrative review of Policy 412 on expense reimbursement has been performed and the current policy adheres to the district’s processes and procedures currently in place. The district’s current policy was reviewed against MSBA’s model policy and continues to match that language. Based on this review, no changes are recommended at this time.

School District 197 reviews its policies on a 3-year cycle unless otherwise required by law. Typically, recommended policy changes are brought to the school board for three readings, with approval at the third reading. However, when the administration is recommending minor or no changes to the policy, it is labeled as an "administrative review." Consistent changes the board has asked to be applied to policies are considered minor. One example is using more inclusive language such as using “parent/guardian” instead of just “parent.”

When labeled an “administrative review” the policy is placed on the consent agenda for a single reading with a recommendation to approve the policy as presented. As a reminder, board members always have the opportunity to remove a policy from the consent agenda to discuss it as part of the main agenda.

The policy was also reviewed using the 4-Way Equity Test. This policy does not provide specific opportunities for the underserved, underrepresented or disadvantaged, but rather provides compliance procedures so district expense reimbursements meet applicable local, state and federal regulations.

**RESOLUTION:**

***BE IT RESOLVED*** by the School Board of School District 197 to approve Policy 412, Expense Reimbursement, as presented.



## **OPERATIONAL EXPECTATIONS**

**ISD 197 School Board**

Employees/Personnel

Contact: Director of Finance

### **412 EXPENSE REIMBURSEMENT**

#### **I. PURPOSE**

The purpose of this policy is to identify school district business expenses that involve initial payment by an employee and qualify for reimbursement from the school district, and to specify the manner by which the employee seeks reimbursement.

#### **II. AUTHORIZATION**

All school district business expenses to be reimbursed must be approved by the supervising administrator. Such expenses to be reimbursed may include transportation, meals, lodging, registration fees, required materials, parking fees, tips, and other reasonable and necessary school district business-related expenses.

#### **III. REIMBURSEMENT**

- A. Requests for reimbursement must be itemized on the official school district form and are to be submitted to the designated administrator. Receipts for lodging, commercial transportation, registration, and other reasonable and necessary expenses must be attached to the reimbursement form.
- B. Automobile travel shall be reimbursed at the mileage rate set by the school board. Commercial transportation shall reflect economy fares and shall be reimbursed only for the actual cost of the trip.

#### **IV. AIRLINE TRAVEL CREDIT**

- A. Employees utilizing school district funds to pay for airline travel are required to ensure that any credits or other benefits issued by any airline accrue to the benefit of the school district rather than the employee.
  - 1. To the extent an airline will not honor a transfer or assignment of credit or benefit from the employee to the school district, the employee shall report receipt of the credit or benefit to the designated administrator within 90 days of receipt of the credit or benefit.

2. Reports of the receipt of an airline credit or benefit shall be made in writing and shall include verification from the airline as to the credit or benefit received. Reimbursement for airline travel expenses will not be made until such documentation is provided.
- B. Employees who have existing credits or benefits issued by an airline based upon previously reimbursed airline travel for school district purposes will be required to utilize those credits or benefits toward any subsequent airline travel related to school district purposes, prior to reimbursement for such travel, to the extent permitted and/or feasible.
  - C. The requirements of this section apply to all airline travel, regardless of where or how the tickets are purchased.

**V. ESTABLISHMENT OF DIRECTIVES AND GUIDELINES**

The superintendent shall develop a schedule of reimbursement rates for school district business expenses, including those expenses requiring advance approval and specific rates of reimbursement. The superintendent shall also develop directives and guidelines to address methods and times for submission of requests for reimbursement.

**Legal References:** Minn. Stat. § 15.435 (Airline Travel Credit)  
Minn. Stat. § 471.665 (Mileage Allowances)  
Minn. Op. Atty. Gen. 1035 (Aug. 23, 1999) (Retreat Expenses)  
Minn. Op. Atty. Gen. 161b-12 (Aug. 4, 1997) (Transportation Expenses)  
Minn. Op. Atty. Gen. 161B-12 (Jan. 24, 1989) (Operating Expenses of Car)

**Cross References:** MSBA/MASA Model Policy 214 (Out-of-State Travel by School Board Members).

<b>POLICY ADOPTED:</b>	December 14, 2009
<b>POLICY REVIEWED/REVISED:</b>	October 5, 2015; March 19, 2019; August 15, 2022
<b>Monitoring Method:</b>	Administrative Review
<b>Monitoring Frequency:</b>	Every three years

TO: School Board Members

FROM: Sara Lein, Director of Special Education

DATE: August 18, 2025

SUBJECT: Review of Policy 427, Workload Limits for Certain Special Education Teachers

**BACKGROUND:**

An administrative review of Policy 427, Workload Limits for Certain Special Education Teachers, has been performed and the current policy adheres to the district's processes and procedures currently in place. This is a mandatory policy for school districts. It was last reviewed and approved in August of 2022. The district's current policy was reviewed against MSBA's model policy and was modified with a minor change under "Direct Services."

School District 197 reviews its policies on a 3-year cycle unless otherwise required by law. Typically, recommended policy changes are brought to the school board for three readings, with approval at the third reading. However, when the administration is recommending minor or no changes to the policy, it is labeled as an "administrative review." Consistent changes the board has asked to be applied to policies are considered minor. One example is using more inclusive language such as using "parent/guardian" instead of just "parent."

When labeled an "administrative review" the policy is placed on the consent agenda for a single reading with a recommendation to approve the policy as presented. As a reminder, board members always have the opportunity to remove a policy from the consent agenda to discuss it as part of the main agenda.

This policy was reviewed using the district's Four-Way Equity Test. The purpose of this policy is to establish general parameters for determining the workload limits of special education staff who provide services to children with disabilities receiving direct special education services 60 percent or less of the instructional day. Guidance from federal regulations and state rules drives the policy, however as a district we have elected to determine workload limits on an individual level. Recognizing the complex and varied needs that students with disabilities bring, consideration for student contact time, evaluation/reevaluation time, indirect services, management of IEPs, travel time and other services required in the IEPs of eligible students ensures equitable practices across the district. Input from building administrators and special education staff are valuable in determining workloads.

**RESOLUTION:**

***BE IT RESOLVED*** by the School Board of School District 197 to approve Policy 427, Workload Limits for Certain Special Education Teachers, as presented.



## **OPERATIONAL EXPECTATIONS**

## **ISD 197 School Board**

Employees/Personnel

Contact: Director of Special Programs

### **427 WORKLOAD LIMITS FOR CERTAIN SPECIAL EDUCATION TEACHERS**

#### **I. PURPOSE**

The purpose of this policy is to establish general parameters for determining the workload limits of special education staff who provide services to children with disabilities receiving direct special education services 60 percent or less of the instructional day.

#### **II. DEFINITIONS**

##### **A. Special Education Staff; Special Education Teacher**

“Special education staff” and “special education teacher” both mean a teacher employed by the school district who is licensed under the rules of the Minnesota Professional Educator Licensing and Standards Board to instruct children with specific disabling conditions.

##### **B. Direct Services**

“Direct services” means special education services provided by a special education teacher **or a related service professional** when the services are related to instruction, including cooperative teaching.

##### **C. Indirect Services**

“Indirect services” means special education services provided by a special education teacher or a related service professional which include ongoing progress reviews; cooperative planning; consultation; demonstration teaching; modification and adaptation of the environment, curriculum, materials, or equipment; and direct contact with the pupil to monitor and observe.

##### **D. Workload**

“Workload” means a special education teacher’s total number of minutes required for all due process responsibilities, including direct and indirect services, evaluation and reevaluation time, management of individualized education programs (IEPs), travel time, parental contact, and other services required in the IEPs.

### III. GENERAL STATEMENT OF POLICY

- A. Workload limits for special education teachers shall be determined by the appropriate special education administrator, in consultation with the building principal and the superintendent.
- B. In determining workload limits for special education staff, the school district shall take into consideration the following factors: student contact minutes, evaluation and reevaluation time, indirect services, management of IEPs, travel time, and other services required in the IEPs of eligible students.

### IV. COLLECTIVE BARGAINING AGREEMENT UNAFFECTED

This policy shall not be construed as a reopening of negotiations between the school district and the special education teachers' exclusive representative, nor shall it be construed to alter or limit in any way the managerial rights or other authority of the school district set forth in the Public Employment Labor Relations Act or in the collective bargaining agreement between the school district and the special education teachers' exclusive representative.

**Legal References:** Minn. Stat. § 179A.07, Subd. 1 (Inherent Managerial Policy)  
Minn. Rule 3525.0210, Subps. 14, 27, 44, and 49 (Definitions)  
Minn. Rule 3525.2340, Subp. 4.B. (Case Loads for School-Age Educational Service Alternatives)

<b>POLICY ADOPTED:</b>	April 18, 2016
<b>POLICY REVIEWED/REVISED:</b>	September 23, 2019; August 15, 2022
<b>Monitoring Method:</b>	Administrative Review
<b>Monitoring Frequency:</b>	Once every three years

TO: School Board Members

FROM: Peter Mau, Assistant Superintendent

DATE: August 18, 2025

SUBJECT: Final Reading of Policy 106, Equity

**BACKGROUND:**

This policy was presented as a first reading to the board at their meeting on June 16, 2025 and a second reading at their meeting on August 4, 2025. To recap, the School Board chose to review the Equity Policy (106) annually. This is the first such review since the policy was originally adopted in 2024. Since the first reading, two minor changes were made: section IV, paragraph C - changing the word “especially” to align with other consistent use of “including” in the rest of the policy; section V, paragraph F - adding the wording of “guardian” consistently.

Over two meetings, the Equity Advisory Committee reviewed the policy for potential changes to suggest. There were two substantial recommendations made. First, it was to include more inclusive language similar to that already in use in some other parts of the policy. Second, language about the dissemination of the policy is suggested in this draft update to the policy. Some other word choice changes were also suggested.

Finally, legal counsel reviewed the policy again. A number of changes were suggested. Some suggestions fell into the category of wording that is too vague or subjective for policy. Other suggestions fall into the category of potential perception of conflicts with statutes, case law, or regulations.

**RESOLUTION:**

***BE IT RESOLVED*** by the School Board of School District 197 to approve Policy 106, Equity, as presented.



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## **OPERATIONAL EXPECTATIONS**

School District

**ISD 197 School Board**

Contact: Assistant Superintendent

### **106 EQUITY**

#### **I. PURPOSE**

The purpose of this policy is to ensure equity and inclusion for every student, staff, and family member in School District 197. Additionally, this policy establishes equity as an essential value in our governance, leadership, policies, programs, operations, and practices.

As our District strategic framework states, we believe:

- People thrive when they feel connected, trusted and affirmed.

To that end, this policy will make it a priority to create the conditions so that every student, staff, family and School District community member feels a sense of belonging, and that they are valued and heard.

- Our diversity makes us stronger.

To that end, this policy serves to affirm this belief by recognizing the value of a wide range of perspectives and lived experiences and their important contributions to our School District community.

- We are all accountable for removing barriers and creating equitable systems.

Through this policy, the school board recognizes the historical legacy and compounding impact of the systems, structures and practices that have created and continue to afford advantages to some groups while further marginalizing and perpetuating inequities for others.

Therefore, we seek the elimination of inequity in our systems, structures and practices as a School District. We recognize that the responsibility for ensuring equitable access, opportunities, participation and outcomes falls on the adults in the system.

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

School District 197 is on an equity journey. While there has been work done previously and some progress has been made, there remains much to do.

The School District is committed to equitable **access and** opportunities ~~and equitable outcomes~~ for all members of our School District community, including students, families and staff.

Creating equitable **access and** opportunities is dependent upon having inclusive policies and practices that represent all students, and providing each student increased access to and creating meaningful participation in high-quality learning experiences where each student realizes positive outcomes. Educational equity benefits everyone and prepares all students to thrive in a racially and culturally diverse local, national and global community.

School District 197 is committed to the success of every student in each of our schools. The school board recognizes the history of **academic, discipline, and social-emotional** disparities that have occurred in many schools across our country based on race and ethnicity, language, immigration status, ~~ability~~, socioeconomic status, sex, and gender identity and sexual orientation (~~LGBTQIA+~~ status) (**2SLGBTQ+ status**) ~~in academic, discipline and or social-emotional outcomes~~. The academic and discipline gaps are contrary to ~~our belief~~ **the fact** that all students can learn and succeed in our schools, and they are unacceptable if we are to meet our School District mission of caring relationships, equitable practices and high achievement for all. Student outcomes must not be predictable based on student demographics or school attended.

The school board also recognizes that it is the responsibility of its administration and staff to remove barriers and create systems to ensure educational equity, which will require the allocation and reallocation of resources. School District 197 will actively work to interrupt, dismantle, and eliminate racism and other forms of inequity by identifying, acknowledging, confronting and disrupting beliefs and systems that marginalize children and their families. This work will be informed by evidence, including research, data, and the voices of marginalized communities.

The school board further recognizes that every student deserves a responsive, affirming and inclusive learning environment in which their cultural norms and experiences are valued and contribute to successful academic and social-emotional outcomes. **School District 197 recognizes the value in validating a student’s own understanding of themselves, their identity, their culture, and their experiences in our schools.**

### **III. DEFINITIONS**

**“2SLGBTQ+” is an acronym that stands for Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer or Questioning and additional sexual orientations and gender identities while the plus reflects the countless affirmative ways in which people choose to self-identify.**

“Equity” means giving each person the (individualized) opportunities and access they need to be successful. This is different from equality, which means giving each person equal (the same) opportunities and access without recognition of their unique needs.

“Educational equity” means the condition of justice, fairness and inclusion in our systems of education so that all students (~~especially~~ **including** those who are a part of traditionally marginalized communities) have access to the opportunities to learn and develop to their fullest potentials.

“Culturally affirming” means treating others’ culture and experiences with respect and high regard

in order to affirm their value. This is done through practices, behaviors and policies that thoroughly acknowledge and proactively seek to affirm students' cultural identities and cultural assets as integral to their positive self-concept and their academic and social well-being.

“Culturally responsive” means having the ability to understand cultural differences, recognize potential biases, and look beyond differences to work productively with children, families, and communities whose cultural contexts are different from one's own.

~~“Culturally responsive teaching” means using students’ customs, characteristics, experience, and perspectives as tools for better student learning and classroom instruction.~~

~~“Disparity” means a noticeable and usually significant difference or dissimilarity,; particularly when the difference is unfair.~~

“Gender identity” means a person’s deeply held knowledge of their own gender, which can include being a man, woman, or another gender. Gender identity is an innate part of a person’s identity. One’s gender identity may or may not align with society’s expectations with the sex they were assigned at birth (male, female, or intersex). **In School District 197, individuals are encouraged to use their self-identified name and pronouns.**

“Institutional racism” means the biases that may be built into the policies, practices, and processes of institutions. These systemic biases discriminate against and disadvantage people of color through unwitting prejudice, ignorance, thoughtlessness or racial stereotyping. As a result, these systemic biases create different and predictable outcomes for different racial groups, typically maintaining an advantage for white individuals and simultaneously maintaining a disadvantage for individuals of color.

“Marginalize” means to treat as insignificant or unimportant or inferior. It involves social exclusion that results from a group having less access or opportunity than other groups.

“Racial consciousness” means understanding multiple theories of race and ethnicity, including but not limited to racial formation, processes of racialization, and intersectionality. Racial consciousness, in regard to intersectionality, means understanding the impact of the intersection of race and ethnicity with other forms of difference, including socioeconomic status, sex, gender identity and sexual orientation ~~(LGBTQIA+ status)~~ **(2SLGBTQ+ status)**, religion, national origin, immigration status, language, ability, and age.

“School culture” means the shared beliefs, norms, and values among the members of the school which can be observed from the behaviors of the members.

#### **IV. COMMITMENTS**

**A. Diverse Classrooms and Schools:** School District 197 commits to promoting equity in educational programs and extracurricular activities. **Student** representation in our classrooms and programs should reflect the diversity of our schools. **This includes socioeconomic status, sex, gender identity and sexual orientation, religion, national origin, immigration status, language, ability, and age.**

B. **Teacher and Leader Quality and Diversity:** School District 197 commits to recruiting, hiring, and retaining a diverse, culturally responsive, and equity-minded workforce ~~that reflects the demographics of our student population~~. This includes ongoing professional development focused on equity, **gender inclusion**, racial consciousness, and cultural responsiveness.

C. **Equitable Resource Allocation:** School District 197 commits to prioritizing the allocation of resources, including but not limited to, curriculum, facilities, staffing, support services, technology, transportation, and activities, in a manner that ensures all students, **especially including** historically marginalized students, have the access and opportunity necessary to succeed.

D. **Equitable Curriculum, Instruction and Assessment:** Aligned to our curriculum review cycle, School District 197 commits to selecting and implementing curriculum that is culturally relevant and representative of our student population. We also commit to including equity in the rubrics used in our decision-making process for curriculum adoption. School District 197 commits to culturally affirming, inclusive, and responsive instructional practices and to equitable assessment and grading practices that foster motivation, are bias-resistant, and accurately reflect student learning.

E. **Equitable Learning in Classroom and Other School Environments:** School District 197 commits to culturally affirming, inclusive, and responsive community building and behavior management practices. Our physical spaces and routines will be reflective of the diversity of our ~~students~~ **students' identities**. We also commit to building strong, supportive relationships with each student while holding them accountable to high expectations. School District 197 commits to behavior support and discipline practices that reduce disparities in suspensions. When there is harm, **we commit to interrupting the harm regardless of the intent, while also committing** ~~we also commit~~ to restoring relationships within the classroom and school.

F. **Equitable Student Leadership and Voice:** School District 197 commits to seeking to gather and understand student perspectives (**especially including** those from historically marginalized groups) in decision-making processes, creating spaces for student ~~affinity~~ groups, and providing leadership opportunities.

G. **Equitable Family and Community Partnerships:** School District 197 commits to building two-way linguistic and cultural bridges between the School District and the various communities it serves. We will seek representation reflective of our student demographics on District advisory committees, provide ~~affinity~~-spaces for ~~families~~ **family groups**; provide cultural liaisons, provide family education, and provide interpretation and translation tools and resources. We commit to using these resources to better understand the perspectives, goals, and priorities of the communities we serve and to seek ongoing input and feedback.

## V. **SHARED RESPONSIBILITIES & ACCOUNTABILITY**

School District 197 believes education is a shared responsibility among staff, students, families, and the community.

A. **School Board:** The school board will ensure that educational equity efforts are in alignment with the District strategic framework. The school board will provide and allocate resources for educational equity. The school board will hold the superintendent accountable for annual progress

toward the commitments of this policy. The school board will hold the superintendent accountable for supporting staff in implementing this policy. The school board will review and update District policies in accordance with the four-way equity test:

- a. How does this help to provide opportunities for **all students, including** students who have historically been underserved, underrepresented, or disadvantaged by the current system?
- b. How does this help to ensure equitable access for all?
- c. How does this help to eliminate barriers (structural, process, financial, etc) based on race and ethnicity, language, immigration status, ability, socioeconomic status, sex, or gender identity and sexual orientation (~~LGBTQIA+ status~~) (**2SLGBTQ+ status**)?
- d. How does this ensure the same rigorous standards for academic performance exist for all students?

**B. Superintendent:** The superintendent shall create procedures and guidelines for the implementation of this policy. Annually, the superintendent or designee, will provide a report to the school board regarding progress on the commitments outlined in this policy. Progress will also be communicated to the community in the District's annual report. In addition to the annual report, the superintendent will ensure ongoing communication with families and the broader community about the District's equity initiatives related to its strategic framework and the commitments in this policy. The superintendent will hold administration accountable for making progress on the commitments. The superintendent will require each site and the District to set annual equity goals. The superintendent will actively cultivate a School District culture that prioritizes equity and recognizes, responds to, and remedy inequities in its practices and systems. The superintendent will provide support to staff responsible for implementing this policy and hold administration accountable to supporting staff in the implementation of this policy.

**C. Administration:** District and site administration will actively cultivate department and school cultures that prioritize equity and recognize, respond to, and remedy inequities in its practices and systems. Administration will support staff in implementing this policy. District and site administration will set annual equity specific goals and action plans and report out progress and results to the superintendent or designee. District and site administration will engage in ongoing equity professional development aimed at increasing their cultural awareness and their ability to be culturally responsive and equity-minded. Administration will provide and align resources to the commitments in this policy and the goals and action plans of sites and District departments. District and site administrators will regularly seek the input and perspectives that reflect the diversity of students in the School District. Administration will strive to recruit, hire and retain culturally responsive and equity-minded staff whose ~~culture cultural~~ backgrounds and experiences are reflective of student demographics in the District.

**D. School District Staff:** School district staff, including administration, will, within the parameters of their various duties and responsibilities, adhere to and execute the equity-based plans developed to meet the commitments named in this policy. School District staff will demonstrate the values outlined by this policy as they go about their daily work. School District staff will actively contribute to the efforts of their site or department in meeting its annual equity goal. School District staff will engage in ongoing equity professional development aimed at increasing their cultural awareness and their ability to be culturally responsive and equity-minded. School District staff are further responsible ~~to make~~ **for making** suggestions to the appropriate authority to improve the ability of the District to live up to the commitments named in this policy.

E. **Students:** Students are partners in their academic achievement and personal growth. Students can demonstrate this partnership by providing feedback to the District, advocating for themselves, taking ownership of their learning, growing toward their goals, supporting the learning environment, and making positive contributions to the school culture. School District 197 acknowledges the important role of student voice and student leadership. Through intentional inclusion and engagement, students will be encouraged to regularly share their voice and leadership as the District actively works to create more equitable systems and opportunities.

F. **Families and Community:** Parents/guardians are responsible for ensuring students attend school. The District is responsible for encouraging ongoing partnerships with families and communities that reflect its diversity. Parents/guardians are encouraged to partner with schools and school staff in culturally meaningful ways. School District 197 will encourage partnership through opportunities to volunteer, ongoing communication, parent/guardian education, and opportunities for parent/guardian participation in decision-making. We will further support community connections and collaborations with groups and organizations that reflect the diversity of our students.

## VI. RELATED POLICIES

It is the policy of the District to maintain a safe and ~~supporting~~ supportive learning and educational environment that is free from harassment, intimidation, violence, and/or bullying and free from discrimination.

Complaints alleging discrimination, harassment, violence or bullying should be made according to the procedures in the policies below. For more information about Equal Education Opportunity, including information about complaints alleging violations, refer to Policy 102. For information about the types of conduct that ~~constitute violation of~~ violate the School District's policy on harassment and violence and the District's procedures for addressing such complaints, refer to the School District's policy on harassment and violence (Policy 413). For information about the types of conduct that ~~constitute violation of~~ violate the School District's policy on bullying and the school district's procedures for addressing such complaints, refer to the District's policy on bullying (Policy 514).

For information about the types of conduct that ~~constitute violation of~~ violate the District's sex discrimination policies and procedures for complaints, refer to Policy 522. For information about the types of conduct that constitute disability discrimination and how to make a complaint, refer to District Policies 402 and 521. Questions related to District Policy 401 Equal Employment Opportunity should be referred to the Director of Human Resources.

## VII. DISSEMINATION OF POLICY

A. **This policy shall be given to each school district employee at the time of initial employment with the school district.**

B. **The school district will develop a method for the regular review of this policy by all employees.**

C. **This policy shall be referenced in the family handbook and the student rights and responsibilities handbook.**

## VIII. REFERENCES

Minnesota Department of Education's Equity Commitments  
Minnesota Professional Educator Licensing and Standards Board's Standards of Effective Practice

***Cross References:*** District Policy 102 Equal Education Opportunity  
District Policy 401 Equal Employment Opportunity  
District Policy 402 Disability Nondiscrimination  
District Policy 413 Harassment & Violence  
District Policy 503 Student Attendance  
District Policy 514 Bullying Prohibition  
District Policy 521 Student Disability Nondiscrimination  
District Policy 522 Title IX Sex Nondiscrimination Policy, Grievance Procedures and Process

<b>POLICY ADOPTED:</b>	August 21, 2023
<b>POLICY REVIEWED/REVISED:</b>	
<b>Monitoring Method:</b>	Administrative Review
<b>Monitoring Frequency:</b>	Annually

**ISD 197 WEST ST. PAUL SCHOOLS**

**Wire Transfers**

**6/1/25 thru 6/30/25**

<u>Date</u>	<u>From</u>	<u>To</u>	<u>Amount</u>
6/6/25	MSDLAF - General	MSDLAF - Payroll	1,781,146.25
6/6/25	MSDLAF _- Payroll	State of MN	124,503.06
6/6/25	MSDLAF - Payroll	IRS	711,169.46
6/6/25	MSDLAF - Payroll	PERA	95,243.20
6/6/25	MSDLAF - Payroll	TRA	359,442.75
6/6/25	MSDLAF - Payroll	EBC	124,368.82
6/6/25	MSDLAF - Payroll	Further	17,713.89
6/20/25	MSDLAF - General	MSDLAF - Payroll	2,380,893.06
6/20/25	MSDLAF _- Payroll	State of MN	129,298.02
6/20/25	MSDLAF - Payroll	IRS	787,296.71
6/20/25	MSDLAF - Payroll	PERA	116,101.95
6/20/25	MSDLAF - Payroll	TRA	405,628.56
6/20/25	MSDLAF - Payroll	EBC	96,261.94
6/20/25	MSDLAF - Payroll	Further	17,713.89
		Total	<u><u>7,146,781.56</u></u>

\* To cover accounts payable or payroll checks.

**Reason**

A/P - P/R\*  
Payroll taxes  
Payroll taxes  
Pension  
TRA contrib.  
403B  
Flex

A/P - P/R\*  
Payroll taxes  
Payroll taxes  
Pension  
TRA contrib.  
403B  
Flex



# **Curriculum Review Update K-12 Math Review Year 3**

## **August 18th School Board Meeting**

Presented By

Curriculum, Instruction & Assessment Team



## Background

2021 - 2022: Year 0 (Reviewing standard changes as published)

2022 - 2023: Year 1 Curriculum Review (Self-Study)

2023 - 2024: Year 2 Curriculum Review (Resource Review)

2024 - Fall 2027: Phased implementation, determined by District 197 review team

2027 - 2028: Full Implementation of 2021 K-12 MN Mathematics standards

### **K-8 Focus for 2024-2025**

Completing Resource Review Process.

### **HS Focus for 2024-2025**

Continued to develop consistency w/instruction as well as begin resource review process.



## Review Team

The curriculum review team was expanded to include K-12 teachers, building administrators, and district administrators. To improve efficiency, the team was divided into three groups:

- K-4 Review Team
- Middle School Review Team
- High School Review Team (with two MS staff)

There was one K-8 meeting throughout the year, on February 20th, so that the K-8 team could arrive on their recommendations for resources.





# Review Team- Elementary

The elementary team had 4 traditional review meeting dates (Nov, Dec, Feb and May) while also fully participating in the Science of Reading Training. Additional staff were added to increase grade level representation.

Focus:

- Curriculum training and planning
- Reflecting on implementation of pilot curriculum
- Data collection on pilot implementation

A screenshot of a digital form titled "Math Curriculum Review Rubric". The form is displayed in a window with a title bar that says "Section 1 of 4". The form has a header with the title and a close button. Below the title, there is a section for "Form description". The main content area contains a question: "Grade level of reviewer". Below this question, there are four radio button options: "K-4 Classroom Teacher", "5-8 Classroom Teachers", "9-12 Classroom Teachers", and "Support Staff". The form is set against a light purple background with a sidebar on the right containing various icons.



# Review Team - MS and HS

The middle school team had 5 traditional review meeting dates (not included on the PD calendar) in October, December, February (K-8), April and May.

Additionally, the middle school math team capitalized on the expanded PD opportunities in 24-25, with most of their **department meeting times** and **three half-day PD sessions** dedicated to supporting the review process.

The high school team met four times across the school year;

- November 4, 2024
- February 14, 2025
- April 1, 2025
- And April 25, 2025

The HS team expanded to include two middle school staff as well.

Date	Time	Outcomes
August 29	7:30AM - 11:00AM	August 29 MS Department PD
Sept 12	7:40 - 8:20AM	MS Schedule Support Sept 12 Dept Meetings
Oct 10	7:40 - 8:20AM	HHMS conferences - Camp St Croix
Nov 4	12:00 - 3:30PM	MS Schedule Support Nov 4 PD by Department
Nov 14	7:40 - 8:20AM	Core topic: 8th grade registration process MS Schedule Support Nov 14 Dept Meetings
Dec 12	7:40 - 8:20AM	MS Schedule Support Dec 12 Dept Meetings
Dec 20	12:00 - 3:30PM	12.20.24 PD Day Afternoon Plan
Jan 9	7:40 - 8:20AM	MS Schedule Support January 9 Dept Meetings
Jan 22	12:00 - 3:30PM	MS Schedule Support Jan 22 PD by Departm... Jan 22 MS PD Summary
Feb 13	7:40 - 8:20AM	MS Schedule Support February 13 Dept Me...
March 13	7:40 - 8:20AM	MS Schedule Support Marchg 13 Dept Meet...
April 1	12:00 - 3:30PM	MS Schedule Support April 1 PD by Departm...
April 10	7:40 - 8:20AM	
May 8	7:40 - 8:20AM	MS Schedule Support May 8 Dept Meetings  Intervention Recommendations - Reading and Math



# Product Exploration in 2024 - 2025

## Plan in August 2024

July 17	Sept.	Late Oct	Nov	Late Dec TBD	Jan	Feb Decide?	Mar	April /May TBD
Meeting 1 8:30-3 PM		MTG 2 8:30-3 PM		Meeting 3 8:30-3 PM		Meeting 4 8:30-3 PM		Meeting 5 8:30-3 PM
6 HR plan	3 HR Plan	2 HR Plan	3 HR Plan	2 HR Plan				
	Reflect Meet 1hr		Reflect Meet 1hr					
<b>Quarter 1 Product Exploration</b> K-5 iReady 6-8 In. Math				<b>Quarter 2 Product Exploration</b> K-4 Reveal 5-8 B Idea				

The team was given some requirements for the type of programs necessary for review in later phases. These requirements are listed below;

- Set of materials that span K-6 and/or a set of materials that span K-8
- Set of materials that span K-12

	K-?, ?-? Recommendation		
K	iReady	and Reveal	or Big Ideas
1	iReady	and Reveal	or Big Ideas
2	iReady	and Reveal	or Big Ideas
3	iReady	and Reveal	or Big Ideas
4	iReady	and Reveal	or Big Ideas
5	iReady	and Big Ideas	and Reveal
6	Big Ideas	and Into Math	
7	Big Ideas	and Into Math	
8	Big Ideas	and Into Math	
HS	Big Ideas	and Reveal	and envisionMath



# Review Process Summary- Elementary

Year 2 Board Update

Next Steps - Elementary

## Elementary (Kindergarten through Grade 4)

- **Conduct product explorations** for at least two program (iReady, Big Ideas, Reveal).
- **Arrive at consensus on which program to recommend for implementation** beginning no later than spring 2025.
- **Improve use and understanding of assessment** resources to best serve students with diverse needs.
- **Develop an implementation plan** that takes into account several factors, including but not limited to the following:
  - the final implementation year as proposed by MDE (2027-2028 school year)
  - Other new curriculums being implemented
  - the most beneficial strategy for bringing certain grades/grade bands into implementation before 2027
  - and the most cost-effective solution bridging current resource license expiration dates, the need for new resources, and the need for effective implementation

## 2024-2025's Major Efforts

The team performed extensive product explorations and evaluations of various math programs: **iReady, Reveal, Big Ideas, Illustrative**

Selected Curriculum for adoption

Planning and prep for partial implementation Fall 2025



# Review Process Summary - MS

Year 2 Board Update



## Next Steps - Middle School

- **Conduct product explorations** for at least two programs (5th grade - iReady and Big Ideas; 6th-8th Into Math and Big Ideas).
- **Arrive at consensus on which program to recommend** for implementation beginning no later than spring 2025
- **Continue to track legislative requirements** related to computer science and personal finance
- **Develop an implementation plan** that takes into account several factors, including but not limited to the following:
  - the final implementation year as proposed by MDE (2027-2028 school year)
  - the most beneficial strategy for bringing certain grades/grade bands into implementation before 2027
  - and the most cost-effective solution bridging current resource license expiration dates, the need for new resources, and the need for effective implementation
- **Continued exploration of how to best serve students** who are;
  - at risk for future math difficulties
  - are simultaneously developing math and English language skills (EL students)
  - being served mathematics instruction in a special education setting or having IEP goals related to math
  - ready for learning math in an accelerated manner
- **Smoothen standards, content, and instructional differences found in the transition between 8th and 9th grade**
- **Professional development** as needed beyond materials training

## 2024-2025's Major Efforts

The team performed extensive product explorations and evaluations of **Big Ideas, Into Math and Reveal.**

Preparing for Fall 2025 implementation



# Review Process Summary - HS

Year 2 Board Update



## Next Steps - High School



- **Update the math pathways and registration materials** for the 25-26 school year to reflect the recommendations noted below;
  - Keep the Analysis course with some minor adjustments (including new resources)
  - Remove the requirement for juniors who intend to take AP PreCalculus to take Algebra II with Trigonometry. This would functionally allow students who take Analysis as juniors to take AP PreCalculus as seniors.
  - Retain the requirement that students who intend to take Calculus AB successfully complete both Algebra II with Trigonometry and AP Precalculus.
- **Continue exploring post-secondary college and career coursework opportunities**, particularly in concurrent enrollment options.
- Develop and implement plans over the summer and fall of 2024 to **restructure support for struggling students in Intermediate Algebra**.
- **Begin an instructional materials review process** as early as fall 2024
- **Arrive at consensus on which program to recommend** for implementation beginning, early as spring 2025.



- Development of Instructional Commitments
- Alignment with New Math Standards and Course Structure Planning
- Extensive Planning for Fall 2025 Implementation and Professional Development



# Data Collection - Elementary Decision

## Rubric Survey Data

	Reveal	Big Ideas	Illustrative
<b>Instructional Materials</b>	17.3	14.5	9.5
<b>Instructional Supports &amp; Usability</b>	9.4	9	6.3
<b>Culturally Responsiveness</b>	8.3	9.6	5.8

## Math Review Rubric

## Standards Alignment

	Reveal	Big Ideas	Illustrative
<b>K</b>	😞	🔴	😞
<b>1</b>	✅-	🔴	😞
<b>2</b>	😞+	✅	✅-
<b>3</b>	✅-	😞+	🔴
<b>4</b>	😞	✅-	🔴

Implementation Surveys measured:

- Pacing
- Resource Utilization
- Differentiation
- Assessments
- Implementation Reflection



# Data Collection - Middle School Decision

	K-?, ?-? Recommendation		
K	iReady	and Reveal	or Big Ideas
1	iReady	and Reveal	or Big Ideas
2	iReady	and Reveal	or Big Ideas
3	iReady	and Reveal	or Big Ideas
4	iReady	and Reveal	or Big Ideas
5	iReady	and Big Ideas	and Reveal
6	Big Ideas	and Into Math	
7	Big Ideas	and Into Math	
8	Big Ideas	and Into Math	
HS	Big Ideas	and Reveal	and envisionMath

July Meeting (Math Training Academy)	August MS Schedule Train Academy PM	August MS Schedule Train Academy PM	August 29 MS Sch Support AM	Sept 12 Dept Mtg	August thru October Remainder of Training Acad
Big Ideas and Into Math Training	Big Ideas and Into Math planning time	Finalize hours for training academy, conduct action research			

Oct 22 or Oct 30	Nov 4 (MS Sch Support)	Nov 12 (Dept mtg)	Dec 4 (Curr Rev)	Dec 12 (Dept mtg)	Dec 20 AM (MS/HS Transition and 5-8 planning)
Reveal and Big Ideas Training / planning	Reveal and Big Ideas planning time	Reveal and Big Ideas planning time	Reveal and Big Ideas planning time	Reveal and Big Ideas Virtual Check-in	Reveal and Big Ideas planning time

K - 8 Math Timeline: Decision making + rest of the year				
Jan 9 (Dept mtg)	Jan 22 (MS Sch Support)	Feb 13 (Dept mtg)	Feb 20 (Curr Rev)	
Identify plan for Q3	Planning time for Q3	Complete Exp #2 Implementation Survey Planning time for Q3	K-8 Meet Compile results	
April 1 (MS Sch Support)	April 3 (Curr. Review MTG)	April 10 -ELEM Only (Curriculum Review MTG)	May 7 (Curr. Review MTG)	Summer 2025
TBD based on decision	TBD based on decision		Planning time for Q4	K-8 (+HS?) Math Training Academy



# Data Collection - Middle School Decision

### McGraw Hill (Reveal)

Use of Canvas/MSW Digital Interface	Use of Canvas for lessons & Unit Programs	Pacing	General Approach to Instruction: Activity Based Education	General Approach to Instruction: Scaffolding
1.5	2.5	3	1.5	1.5

Not at all good - It is not for me to use beyond the issues we are facing in our implementation

What has been the most difficult aspect of implementation for you so far?

- Insufficient Content: Content lacks sufficient depth, leaving students unprepared for classroom practice.
- Inflexible Materials: Assignments and assessments are uneditable, preventing alignment with alternative content and standards to student needs.
- Poor User-Facing Format: Users are confused and struggling, forcing reliance on "Additional Teacher" resources for non-working, which also hinders engagement and learning gains.
- Unengaging Activities: Worksheets and problem sets are not engaging for students.

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7

8

### HMH - Into Math

Use of Canvas/MSW Digital Interface	Use of Canvas for lessons & Unit Programs	Pacing	General Approach to Instruction: Activity Based Education	General Approach to Instruction: Scaffolding
1.5	2.5	3	1.5	1.5

Useability/Navigation Issues (Teacher & Student): This encompasses problems with the HMH Ed app (especially regarding Canvas integration, alignment management, and navigation), the materials themselves ("on the floor" questions and HMH Ed content), the confusing alignment of "task examples," busy and overly pages, insufficient content and standards to student needs, difficulty finding resources (too many clicks, missing materials), and general lack of user-friendliness.

Executive Functioning Challenges (Student): The curriculum's format and structure are difficult for students to manage, requiring them to juggle multiple materials (workbooks, notebook, iPad) and navigate a complex system. This is exacerbated by the HMH Ed app's issues.

Content/Content and Pacing Concerns: Concerns about the curriculum being too much too fast, the level of rigor in the first module being inappropriate for 7th grade, confusing problem wording and overly complex tasks, unrealistic problems, and lack of functional review (e.g., "practice material" is problematic, the "checks for understanding" are added).

Technology Issues: Problems with the HMH Ed app, lack of Canvas integration, issues with online assignments (blank submissions, grading), and the lack of interactive content to work.

Confidence/Implementation Challenges: Teachers express a lack of confidence and ongoing struggles with implementation, despite some improvement over time. This has not been resolved by the issues and ongoing learning beyond them.

Positive Aspects: Some positive aspects are mentioned, including the physical workbooks, some of the "task bar learning" activities, interactive tasks (when they work), the "checks for understanding," and the consumable content. The rigor, while initially challenging, is seen as potentially beneficial for higher-level thinkers.

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1.5	2.5	3	1.5	1.5

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### Cengage (Big Ideas)

Use of Canvas/MSW Digital Interface	Use of Canvas for lessons & Unit Programs	Pacing	General Approach to Instruction: Activity Based Education	General Approach to Instruction: Scaffolding
1.5	2.5	3	1.5	1.5

Digital Platform Usability: This is the most prominent theme. Teachers repeatedly cite issues with the digital platform, including it being not user-friendly for students, incompatible with iPads, and lacking key features like cross-listing classes for assignments.

Pacing and Implementation Challenges: Many teachers mention pacing issues, often needing to slow down the curriculum due to its fast pace or integration challenges with previous curricula. They also describe general implementation difficulties, even as they "get better" over time. Assigning digital work and evaluating student work (both digitally and on paper) are also cited as challenges.

Feedback on Content and Resources: There's praise for the curriculum's content. Teachers appreciate the glossary, career videos, practice in guided practice, variety of problems, engaging lessons, and Spanish translations of notes and practice pages. The availability of PDFs is also seen as an asset.

Student Engagement and Success: Teachers report that students are generally able to follow the lessons, enjoy certain aspects of the curriculum (like puzzles and self-reflection questions), and are having more success with challenging problems.

Confidence Levels: Responses regarding teacher confidence are mixed, but trending more positive.

Need for Improvements and Consistency: Teachers clearly express the need for improvements to the digital platform, particularly its usability and iPad compatibility. Some also mention missing MN standards and the need to piece together lessons.

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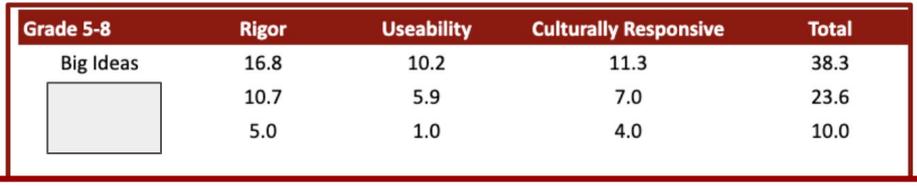
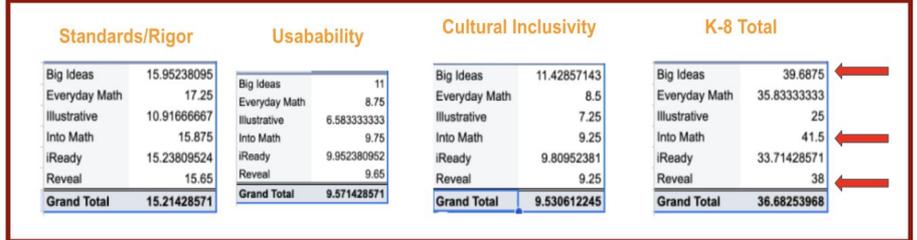
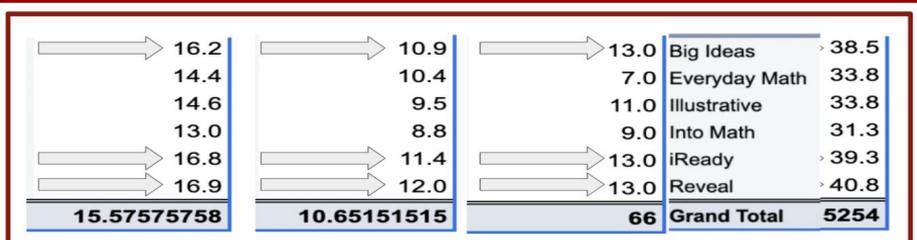
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## Data Collection - High School Decision

During the 2025-2026 academic year, the high school math team will embark on a year-long pilot program focused exclusively on the Savvas envisionmath resources, identified as the program with the most promising results.

This pilot aims to strategically determine the optimal integration of envisionmath components into the high school mathematics curriculum.

The team will thoroughly evaluate the effectiveness and suitability of various resources, including (but not limited to);

- student workbooks,
- hardbound textbooks,
- and the extensive suite of digital tools such as Savvy Adaptive, Successmaker, and MathXL, to identify which elements best support student learning and align with instructional goals.



# Four Way Equity Test

Does this help to provide opportunities for students who have historically been underserved, underrepresented, or disadvantaged by the current system?

Does this help to ensure equitable access for all?

Does this help to eliminate barriers based on gender, race/ethnicity, national origin, color, disability, age or other protected group?

Does this ensure the same rigorous standards for academic performance exist for all students?

Category/Role 3: Culturally Responsive						
Descriptor	Example	Observed				Notes
		Y	S	Y	N	
Student and teacher-facing materials support a wide representation of people, perspectives, and histories within the math images, names, lessons, activities, and assessments	Represent full, complex characters from marginalized groups so that students can have a more holistic understanding of themselves and others	EX	Y	S	N	
Materials support a strong home-school connection	Does it include homework/at-home practice? Does it include a parent letter? Family support	EX	Y	S	N	
Guidance is provided within the core materials on making real-life connections between academic content and the local neighborhood, culture, environment, and resources.	Is it authentic and engaging? Multiple points of view? Student on their background knowledge					
Teacher guidance is provided on practices that support the learning, development, and engagement of students from diverse	EL support there a version of language available to support students from diverse					

Grade	Courses			
	General Options	*Single Acceleration Options	*Double Acceleration Options	
7			Intermediate Algebra	
8	Linear Algebra <small>(not a high school-level course)</small>	Intermediate Algebra	Geometry	
9	Intermediate Algebra	Geometry	Algebra 2	Algebra 2 w/ Trigonometry
10	Geometry	Algebra 2	Algebra 2 with Trigonometry	AP Pre Calculus
11	Algebra 2	Algebra 2 with Trigonometry	Analysis OR *Algebra 2 with Trigonometry	AP Pre Calculus
			AP Pre Calculus	AP Calculus AB
			AP Calculus AB OR AP Statistics	AP Calculus AB OR AP Statistics
			AP Calculus BC OR AP Statistics	AP Calculus BC OR AP Statistics
			Programming, AP Computer Science	

16.2	10.9	13.0	38.5
14.4	10.4	7.0	33.8
14.6	9.5	11.0	33.8
13.0	8.8	9.0	31.3
16.8	11.4	13.0	39.3
16.9	12.0	13.0	40.8
<b>15.57575758</b>	<b>10.65151515</b>	<b>66</b>	<b>Grand Total 5254</b>

Standards/Rigor	Usability	Cultural Inclusivity	K-8 Total
Big Ideas 15.95238095	Big Ideas 11	Big Ideas 11.42857143	Big Ideas 38.8875
Everyday Math 17.25	Everyday Math 8.75	Everyday Math 8.5	Everyday Math 35.83333333
Illustrative 10.91666667	Illustrative 6.58333333	Illustrative 7.25	Illustrative 25
Into Math 15.875	Into Math 9.75	Into Math 9.25	Into Math 41.5
iReady 15.23809524	iReady 9.95238095	iReady 9.80952381	iReady 33.71428571
Reveal 15.85	Reveal 9.85	Reveal 9.25	Reveal 35
<b>Grand Total 15.21428571</b>	<b>Grand Total 9.87142857</b>	<b>Grand Total 9.539612245</b>	<b>Grand Total 36.68253968</b>

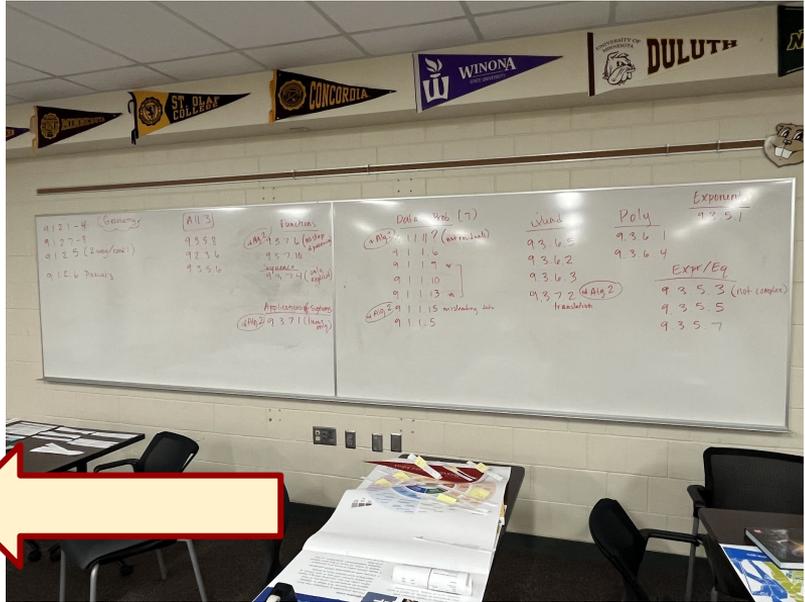
Grade 5-8	Rigor	Usability	Culturally Responsive	Total
Big Ideas	16.8	10.2	11.3	38.3
	10.7	5.9	7.0	23.6
	5.0	1.0	4.0	10.0

✦ **MINNESOTA TRIBAL NATIONS CONTEXTS:** Connect mathematical problem solving experiences and contributions to place, story, cultural practices, language and perspectives relevant to historical and contemporary Dakota and Anishinaabe communities. The four directions symbol (✦) represents Minnesota Tribal Nations Contexts.



# Outcomes

Grade	Strand	Anchor Standard	Code	Benchmark	Class	Unit
9-11	Data and Probability	Data Sciences: Identify, formulate and investigate statistical questions by collecting data, considering cultural perspectives, analyzing and interpreting data and communicating the results.	9.1.1.10	Create and analyze data displays, including scatter plots, histograms and boxplots using technology. (MP3) #	IA	Data & Prob
9-11	Data and Probability	Data Sciences: Identify, formulate and investigate statistical questions by collecting data, considering cultural perspectives, analyzing and interpreting data and communicating the results.	9.1.1.11	Identify, create and compare statistical models with linear and exponential functions, including linear regression. Assess the reasonableness of model fit using residuals and correlation coefficients. (MP4) # $\mu$	IA - Algebra 2	Data & Prob
9-11	Data and Probability	Data Sciences: Identify, formulate and investigate statistical questions by collecting data, considering cultural perspectives, analyzing and interpreting data and communicating the results.	9.1.1.15	Identify and explain misleading uses of data along with how to use spreadsheets, tables or graphing technology to recognize and analyze distortions in data displays. Use interactive data visualizations to support and influence different points of view. (MP3) # 5	IA - Algebra 2	Data & Prob
9-11	Data and Probability	Data Sciences: Identify, formulate and investigate statistical questions by collecting data, considering cultural perspectives, analyzing and interpreting data and communicating the results.	9.1.1.5	Analyze and explain when arguments based on data confuse correlation and causation. (MP3)	IA	Data & Prob
9-11	Data and Probability	Data Sciences: Identify, formulate and investigate statistical questions by collecting data, considering cultural perspectives, analyzing and interpreting data and communicating the results.	9.1.1.6	Compute using technology or estimate the correlation coefficient of a linear model. Interpret the linear model in the context of the data. (MP5, MP6) \$	IA	Data & Prob
9-11	Data and Probability	Data Sciences: Identify, formulate and investigate statistical questions by collecting data, considering cultural perspectives, analyzing and interpreting data and communicating the results.	9.1.1.9	Use statistics appropriate to the shape of the data distribution to compare the center and spread of two or more data sets. (MP4)	IA - Algebra 2	Data & Prob
		Measurement: Investigate measurement using a variety of tools, units, systems, processes and techniques in various cultures. Explain and reason with attributes, estimations and formulas to communicate measurement(s) and				



# Next Steps - Elementary



Feature	Why It Matters
<b>Standards-Aligned Quality</b>	Ensures consistency and rigor across all grade levels
<b>Equity, SEL &amp; Career Integration</b>	Supports diverse learners and builds confidence
<b>Blended Digital Access</b>	Enables adaptive instruction and data-informed pacing
<b>Metacognitive Routines</b>	Encourages ownership, deeper understanding, and discourse



## Next Steps - Elementary

**Reveal Math Training Academy 2025:** Teams of teachers will:

- Completed curriculum training- August 2025
- Co-created **scope and sequence**
- Developed **common formative assessments**
- Aligned and refined **grading rubrics**
- Trial digital platforms: **MH+ digital assessments & Aleks adaptive tool**

This group will implement the new resources this year and meet throughout the year to refine, monitor and adjust. They will help in the roll-out in April.





## Next Steps - Elementary

### **April 24, 2026 (Professional Development Day)**

All Elementary teacher will receive Reveal Math training and have the option to implement the curriculum for the remainder of the 25-26 school year.

**2026-2027 school year full curriculum rollout in all K-4 classrooms.**





# Next Steps - MS/HS 25-26 Plans



### Data Collection - High School Decision

During the 2025-2026 academic year, the high school math team will embark on a year-long pilot program focused exclusively on the Savvas envisionmath resources, identified as the program with the most promising results.

This pilot aims to strategically determine the optimal integration of envisionmath components into the high school mathematics curriculum.

The team will thoroughly evaluate the effectiveness and suitability of various resources, including (but not limited to):

- student workbooks,
- hardbound textbooks,
- and the extensive suite of digital tools such as Savvy Adaptive, Successmaker, and MathXL, to identify which elements best support student learning and align with instructional goals.

## MS and HS Math Review Timeline; 2025-2026

	Training Academy Meeting 1	Training Academy Meeting 2	Training Academy Meeting 3																																				
<b>MS Math</b>	July 8	July 15	TBD	<table border="1" style="width: 100%; border-collapse: collapse; font-size: 0.8em;"> <tr> <td style="width: 10%;">24</td> <td style="width: 15%;">SEP 2025, WED</td> <td style="width: 15%;">7:45am - 3:15pm</td> <td style="width: 15%;">9-12 Math Review</td> <td style="width: 45%;">DO Training Room, District Office-1-DO-Training/Board Room (40)</td> </tr> <tr> <td>29</td> <td>OCT 2025, WED</td> <td>8am - 3:30pm</td> <td>5-8 Math Review</td> <td>DO Training Room, District Office-1-DO-Training/Board Room (40)</td> </tr> <tr> <td>12</td> <td>NOV 2025, WED</td> <td>7:45am - 3:15pm</td> <td>9-12 Math Review</td> <td>DO Training Room, District Office-1-DO-Training/Board Room (40)</td> </tr> <tr> <td>14</td> <td>JAN 2026, WED</td> <td>8am - 3:30pm</td> <td>5-8 Math Review</td> <td>DO Small Conf Rm (8 - 10AM) DO Training Room (10AM - 3:30PM), D</td> </tr> <tr> <td>4</td> <td>FEB 2026, WED</td> <td>7:45am - 3:15pm</td> <td>9-12 Math Review</td> <td>DO Training Room, District Office-1-DO-Training/Board Room (40)</td> </tr> <tr> <td>11</td> <td>MAR 2026, WED</td> <td>8am - 3:30pm</td> <td>5-8 Math Review</td> <td>DO Training Room</td> </tr> <tr> <td>7</td> <td>APR 2026, TUE</td> <td>7:45am - 3:15pm</td> <td>9-12 Math Review</td> <td>DO Small Conf Room or math classroom, District Office-1-DO-Com</td> </tr> </table>	24	SEP 2025, WED	7:45am - 3:15pm	9-12 Math Review	DO Training Room, District Office-1-DO-Training/Board Room (40)	29	OCT 2025, WED	8am - 3:30pm	5-8 Math Review	DO Training Room, District Office-1-DO-Training/Board Room (40)	12	NOV 2025, WED	7:45am - 3:15pm	9-12 Math Review	DO Training Room, District Office-1-DO-Training/Board Room (40)	14	JAN 2026, WED	8am - 3:30pm	5-8 Math Review	DO Small Conf Rm (8 - 10AM) DO Training Room (10AM - 3:30PM), D	4	FEB 2026, WED	7:45am - 3:15pm	9-12 Math Review	DO Training Room, District Office-1-DO-Training/Board Room (40)	11	MAR 2026, WED	8am - 3:30pm	5-8 Math Review	DO Training Room	7	APR 2026, TUE	7:45am - 3:15pm	9-12 Math Review	DO Small Conf Room or math classroom, District Office-1-DO-Com
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<b>HS Math</b>	July 22	July 23	TBD																																				
<b>Begin Action Research →</b>				<b>18 additional hours compensation</b>																																			





TO: School Board Members

FROM: Peter Olson-Skog, Superintendent

DATE: August 18, 2025

SUBJECT: Approval of Policy 527 – Student Use and Parking of Motor Vehicles; Patrols, Inspections, and Searches

**BACKGROUND:**

This is a new policy for School District 197 and aligns with MSBA’s Model Policy. The purpose of this policy is to provide guidelines for the use and parking of motor vehicles by students in school district locations, and provide clear guidelines for patrols, inspections, and searches.

The position of the school district is that a fair and equitable district-wide student motor vehicle policy will contribute to the quality of the students’ educational experience, will maintain order and discipline in the schools, and will protect the health, safety, and welfare of students and school personnel. This policy applies to all students in the school district.

Beyond the portions of the MSBA model policy that require language specific to the district, the only difference from the model policy is that the board is granting the superintendent and/or their designee(s) the authority to develop procedures to support the implementation of this policy. This allows changes to be made without waiting for a three-reading policy amendment, as the administration monitors the implementation of this new policy. It should also be noted that it is a typical procedure for the administration to be charged with implementing the policies adopted by the board and to develop procedures to support said implementation.

While the administration is seeking authority to develop associated procedures for this policy without returning to the board for approval of said procedures, the administration would like to communicate its intent to implement procedures (specific to the parking portion of Policy 527) within the following general guidelines:

1. Clear signage will be posted to warn of the potential consequences of parking in undesignated/unauthorized areas (i.e. towed at owner's expense).
2. Families and students will receive clear communication on the expectations and consequences for not following the expectations, and the procedure will not be implemented until communication has been distributed.
3. Anyone parked inappropriately will receive a warning via a note left on their windshield.\*
4. If the same license plate is identified as having parked in an authorized parking area after having received a warning, it may be towed.

\*There are situations where a vehicle may be immediately towed without a warning. Examples include parking on a sidewalk, parking in a manner that impedes emergency responder access, etc.

**RESOLUTION:**

This is a first reading. No action is needed at this time.



## **OPERATIONAL EXPECTATIONS**

**ISD 197 School Board**

Students

Contact: Superintendent

### **527 STUDENT USE AND PARKING OF MOTOR VEHICLES; PATROLS, INSPECTIONS, AND SEARCHES**

#### **I. PURPOSE**

The purpose of this policy is to provide guidelines for use and parking of motor vehicles by students in school district locations, to maintain order and discipline in the schools, and to protect the health, safety, and welfare of students and school personnel.

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

The policy of this school district is to allow the limited use and parking of motor vehicles by students in school district locations. The position of the school district is that a fair and equitable district-wide student motor vehicle policy will contribute to the quality of the student's educational experience, will maintain order and discipline in the schools, and will protect the health, safety, and welfare of students and school personnel. This policy applies to all students in the school district.

#### **III. DEFINITIONS**

- A. "Contraband" means any unauthorized item possession of which is prohibited by school district policy and/or law. It includes, but is not limited to, weapons and "look-alikes," alcoholic beverages, controlled substances and "look-alikes," overdue books and other materials belonging to the school district, and stolen property.
- B. "Reasonable suspicion" means that a school official has grounds to believe that the search will result in evidence of a violation of school district policy, rules, and/or law. Reasonable suspicion may be based on a school official's personal observation, a report from a student, parent, or staff member, a student's suspicious behavior, a student's age and past history or record of conduct both in and out of the school context, or other reliable sources of information.

- C. “Reasonable scope” means that the scope and/or intrusiveness of the search is reasonably related to the objectives of the search. Factors to consider in determining what is reasonable include the seriousness of the suspected infraction, the reliability of the information, the necessity of acting without delay, the existence of exigent circumstances necessitating an immediate search and further investigation (e.g., to prevent violence, serious and immediate risk of harm, or destruction of evidence), and the age of the student.
- D. “School district location” means property that is owned, rented, leased, or borrowed by the school district for school purposes, as well as property immediately adjacent to such property that may be used for parking or gaining access to such property. A school district location also shall include 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.

#### **IV. STUDENT USE OF MOTOR VEHICLES IN SCHOOL DISTRICT LOCATIONS**

Students generally are not permitted to use motor vehicles during the school day in any school district location. Students may use motor vehicles on the high school campus[es] during the school day only if there is an emergency and permission has been granted to the student by **the principal and/or lead school administrator** to use a motor vehicle. Students are permitted to use motor vehicles in school district locations outside of the school day only on the high school campus[es].

#### **V. STUDENT PARKING OF MOTOR VEHICLES IN SCHOOL DISTRICT LOCATIONS**

- A. Students are permitted to park in a school district location as a matter of privilege, not of right. Students driving a motor vehicle to a high school campus may park the motor vehicle in the parking lot designated for student parking only. Students will not park vehicles in driveways, on private property, **on street locations where parking is restricted or in other designated areas, e.g. parking lots designated for use only by staff or by the general public, including designated visitor parking areas. Students who park in areas must display a valid, school-issued parking permit. A valid permit is one that has been paid in full and has been issued by the school for the current term. The vehicle that is parked with the permit must be on record with the school. Information about purchasing a parking permit can be found on the school's website and in the main office.**
- B. When there are unauthorized vehicles parked on school district property, school officials may:
  - 1. move the vehicle or require the driver or other person in charge of the vehicle to move it off school district property; or

2. if unattended, provide for the removal of the vehicle, at the expense of the owner or operator, to the nearest convenient garage or other place of safety off of school district property.

## **VI. PATROLS, INSPECTIONS, AND SEARCHES**

School officials may conduct routine patrols of school district locations and routine inspections of the exteriors of the motor vehicles of students. In addition, the interiors of motor vehicles of students in school district locations may be searched when school officials have a reasonable suspicion that the search will uncover a violation of law and/or school policy or rule.

### **A. Patrols and Inspections**

School officials may conduct routine patrols of student parking lots and other school district locations and routine inspections of the exteriors of the motor vehicles of students. Such patrols and inspections may be conducted without notice, without student consent, and without a search warrant.

### **B. Search of Interior of Student Motor Vehicle**

The interiors of motor vehicles of students in school district locations, including glove or trunk compartments, may be searched when school officials have a reasonable suspicion that the search will uncover a violation of law and/or school policy or rule. The search will be reasonable in its scope and intrusiveness. Such searches may be conducted without notice, without consent, and without a search warrant. A student will be subject to withdrawal of parking privileges and to discipline if the student refuses to open a locked motor vehicle under the student's control or its compartments upon the request of a school official.

### **C. Prohibition of Contraband and Interference with Patrols, Inspections, Searches, and/or Seizures**

A violation of this policy occurs when students store or carry contraband in motor vehicles in a school district location or interfere with patrols, inspections, searches, and/or seizures as provided by this policy.

### **D. Seizure of Contraband**

If a search yields contraband, school officials will seize the item and may turn it over to legal officials for ultimate disposition when appropriate.

### **E. Dissemination of Policy**

A copy of this policy will be printed in the student handbook or disseminated in any other way which school officials deem appropriate.

## VII. DIRECTIVES AND GUIDELINES

The superintendent is granted authority to develop and present for school board review ~~and approval~~ reasonable directives and guidelines which address specific needs of the school district related to student use and parking of motor vehicles in school district locations, such as a permit system and parking regulations. ~~Approved directives and guidelines shall be attached as an addendum to this policy.~~

## VIII. VIOLATIONS

A student found to have violated this policy and/or the directives and guidelines implementing it shall be subject to withdrawal of parking privileges and/or to discipline in accordance with the school district's Student Discipline Policy, which may include suspension, exclusion, or expulsion. In addition, the student may be referred to legal officials when appropriate.

**Legal References:** U. S. Const., amend. IV  
Minn. Const., art. I, §10  
Minn. Stat. § 123B.02, Subds. 1 and 5 (General Powers of Independent School Districts)  
Minn. Stat. § 123B.38 (Hearing)  
*New Jersey v. T.L.O.*, 469 U.S. 325 (1985)

**Cross References:** MSBA/MASA Model Policy 417 (Chemical Use and Abuse)  
MSBA/MASA Model Policy 418 (Drug-Free Workplace/Drug-Free School)  
MSBA/MASA Model Policy 501 (School Weapons Policy)  
MSBA/MASA Model Policy 502 (Search of Student Lockers, Desks, Personal Possessions, and Student's Person)  
MSBA/MASA Model Policy 506 (Student Discipline)  
MSBA/MASA Model Policy 712 (Video Surveillance Other Than on Buses)

**Adopted:**

**Revised:**

**Monitoring Method:** Administrative Review

**Monitoring Frequency:** Every three years

To: School Board Members

From: Mark Fortman, Director of Operations

Date: August 18, 2025

Re: First Reading of Policy 534, Unpaid Meal Charges

**BACKGROUND:**

A review of Policy 534, Unpaid Meal Charges, has been performed. This policy was last reviewed in February of 2021. Based on this review, a couple of changes are being recommended to conform with recent MN statute changes and MSBA recommendations.

It is important to note that the changes to the policy are not new practices for our district and only formally add our existing practices to the policy. For years, we have clearly communicated to our staff that there should be no taking of meals from any student, regardless of their account status, or shaming a student in any way.

Significant changes to note are:

Change in policy name to School Meals Policy

Section II, Payment of Meals

- A. Independent School District 197 participates in the Minnesota Free School Meals Program, and therefore all enrolled students will be offered one breakfast and one lunch at no charge while at school regardless of any outstanding child nutrition account balance. 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 meal balance.

### Section III, Low or Negative Account Balances - Notification

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

### Section IV, Unpaid Meal Charges

- The school district will not impose any other restriction prohibited under Minnesota Statutes, section 123B.37 due to unpaid student child nutrition account 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 child nutrition account balance.

The policy was reviewed using the 4-way equity test. Within the Strategic Framework, equity is specified as a core value of the district, further emphasizing our commitment to providing all students with equitable access to educational resources, two free meals per day without shame and opportunities such as graduation.

### **RECOMMENDED RESOLUTION:**

This is a first reading. No resolution is needed at this time.



## OPERATIONAL EXPECTATIONS

ISD 197 School Board

Students

Contact: Director of Operations

### 534 ~~UNPAID MEAL CHARGES~~ **SCHOOL MEALS POLICY**

#### 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 school district employees, families, and students have a shared understanding of expectations regarding meal charges. 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 ~~school~~ **a la carte or second** meals as well as to maintain the financial integrity of the school nutrition program.

#### II. PAYMENT OF MEALS

- A. Independent School District 197 participates in the Minnesota Free School Meals Program, and therefore all enrolled students will be offered one breakfast and one lunch at no charge while at school regardless of any outstanding child nutrition account balance. 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 meal balance.
- ~~A~~ B. Each student has their own ~~personal~~ **child nutrition** account in which parents may deposit money for **a la carte or second meal** purchases. Payment to accounts may be made at a student's individual school with a personal check or cash. Personal checks or cash amounts may also be made at the District Child Nutrition Office for individual or multiple students, attending any district school, with a noted designation of how the money is to be divided.
- ~~B~~ C. The district's online payment system allows parents to make payments to their child's meal account. Parents or guardians also have the ability to view account balance, payments made, and purchase history for their child. Confirmation of payments and low balance reminders are emailed to parents or guardians. An auto-replenish feature is also available, which deposits funds into their child's account when it reaches a specified low balance. Parents or guardians need not make deposits via the online payment system in order to register an account to receive low-balance reminders and view a student's purchase history.

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

- A. ~~Parents of full pay students will receive a low balance notification when their child's account balance drops below \$10.00. Parents will be notified of low balances by email, US Mail, and/or an automated calling system.~~ **The school district will make reasonable efforts to notify families when child nutrition account balances are low or fall below zero.**
- B. Parents will receive a negative balance notification when their child's account balance drops below \$0.00. Parents will be notified of low balances by email, US Mail, and/or an automated calling system.
- C. ~~Only full pay students will receive notification reminders for payment of low or negative student meal balances and they will not demean or stigmatize any student participating in the school meal program.~~ **Reminders for payment of outstanding student meal child nutrition account balances will not demean or stigmatize any student participating in the school lunch program, including, but not limited to, dumping meals, withdrawing a food item that has been served, announcing or listing students' names publicly, providing alternative meals not specifically related to dietary needs; providing non-reimbursable meals; or affixing stickers, stamps, or pins.**
- D. ~~It is the parent's or guardian's responsibility to make sure their child has adequate funds in their meal account as the district uses a debit based point of sale system.~~
- E. ~~Students in Kindergarten through Twelfth (12<sup>th</sup>) Grade will, however, receive a breakfast and lunch of their choice regardless of the child's account balance.~~
- F. ~~Students in all grades will not be allowed to purchase a la Carte items, including individual cartons of milk, if they do not have sufficient funds in their account to purchase the item(s).~~

### IV. UNPAID MEAL CHARGES

- A. The school district will make reasonable efforts to communicate with ~~full pay~~ families to resolve the matter of unpaid charges. Where appropriate, families may be encouraged to apply for free ~~and~~ **or** reduced-price meals for their children.
- B. The school district will make reasonable efforts to collect unpaid meal charges classified as delinquent debt ~~from only full pay families.~~ Unpaid ~~meal~~ **child nutrition account** 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 greater than \$50.00, not paid prior to the end of the month in which the \$50.00 threshold is reached, will be turned over to the superintendent or

superintendent's designee for collection. 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. ~~This applies to full pay negative balances only.~~

- 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 may not deny any student the opportunity to participate in graduation ceremonies or other commencement activities due to unpaid meal charges.~~ The school district will not impose any other restriction prohibited under Minnesota Statutes, section 123B.37 due to unpaid student meal child nutrition account 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 child nutrition account balance.

## V. COMMUNICATION OF POLICY

- A. This policy and any pertinent supporting information shall be provided in the School District Family Handbook which is distributed to:
  - 1. all households 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, in addition to providing the required written notification described above.

**Legal References:** ~~Minn. Stat. § 124D.111, Subd. 4~~  
~~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~~

**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

<b>POLICY ADOPTED:</b>	August 7, 2017
<b>POLICY REVIEWED/REVISED:</b>	December 18, 2017; March 15, 2021, August 4, 2025
<b>Monitoring Method:</b>	Administrative Review
<b>Monitoring Frequency:</b>	Once every three years

TO: School Board Members

FROM: Scott LeSage, Director of Finance

DATE: August 18, 2025

SUBJECT: First Reading of Policy 721 – Uniform Guidance Policy Regarding Federal Revenue Sources

**BACKGROUND:**

An administrative review of Policy 721, Uniform Guidance Policy Regarding Federal Revenue Sources, has been performed. There were several updates to the policy, as recommended by the auditors, which include:

The purchase of items using federal funds (i.e. Title, School Nutrition, special education) must comply with federal standards. One of these standards is that micro-purchases, items costing less than \$10,000, can be purchased without obtaining competitive quotes. This is a different standard than MN state law, which assigns micro-purchase status up to \$25,000.

Federal law allows the school board to increase the micro-purchase limit to \$50,000. To create consistent purchasing standards, we recommend an increase in line with MN statute, or \$25,000. We recommend that this action be retroactive to July 1, 2025 and used going forward.

This action has been taken by several MN school districts.

**RESOLUTION:**

*WHEREAS*, a School District entering into an agreement for the sale or purchase of supplies, materials, equipment, or the rental thereof, or the construction, alteration, repair, or maintenance of real or personal property must abide by the Minnesota statutes relating to contracting and bidding.

Minn. Stat. § 471.345, the Uniform Municipal Contracting Law, was established to provide dollar limits for all municipalities upon contracts which shall or may be entered into on the basis of competitive bids, quotations, or purchase or sale in the open market. Minn. Stat. § 471.345. Generally, the following thresholds apply:

1. For contracts over \$175,000 - sealed bids, solicited by public notice, and subject to the particular requirements of the governmental subdivision.
2. For contracts from \$25,000 to \$175,000 - sealed bids or direct negotiation, with two quotations whenever possible.

3. For contracts of \$25,000 or less - open market or quotations (with at least two contract quotations, if practicable).

**WHEREAS**, the School District must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of this 2 CFR § 200.318, for the acquisition of property or services required under a federal award or subaward.

**WHEREAS**, all procurement transactions for the acquisition of property or services required under a federal award must be conducted in a manner providing full and open competition consistent with the standards of 2 CFR § 200.319 and 2 CFR § 200.320.

2 CFR § 200.320 Methods of Procurement to be followed:

1. For contracts over the Simplified Acquisition Threshold, generally defined as \$250,000 in the Federal Acquisition Regulations (FAR) - formal procurement methods such as sealed bids or proposals are appropriate.

2. For contracts determined to be “small purchases” that is the aggregate dollar amount of which is higher than the micro-purchase threshold and smaller than the Simplified Acquisition Threshold, price or rate quotations must be obtained from an adequate number of qualified sources.

3. For contracts determined to be “Micro-purchases” currently defined in the Federal Acquisition Regulations (FAR) as \$10,000 or less- Micro-purchases may be awarded without soliciting competitive price or rate quotations if the non-Federal entity considers the price to be reasonable based on research, experience, purchase history or other information and documents it files accordingly.

Purchase cards can be used for micro-purchases if procedures are documented and approved by the non-Federal entity.

**WHEREAS**, 2 CFR 200.320 (a) {1} {iv} allows for the School District to increase their micro-purchase threshold up to \$50,000. Non-Federal entities may establish a threshold higher than the micro-purchase threshold identified in the FAR in accordance with the requirements of this section. The School District may self-certify a threshold up to \$50,000 on an annual basis and must maintain documentation to be made available to the Federal awarding agency and auditors in accordance with 2 CFR § 200.334. The self-certification must include a justification, clear identification of the threshold, and supporting documentation of a higher threshold consistent with State law.

**THEREFORE; BE IT RESOLVED** that the School Board of Independent School District 197, approves an increase to the School District’s federal Micro-purchase threshold from \$10,000 to \$25,000 to be consistent with Minnesota Stat. § 471.345, subd. 5, as allowed by 2 CFR § 200.320(a)(1)(iv), for the acquisition of property or services under a federal award. This increase is retroactive to July 1, 2025.



## **OPERATIONAL EXPECTATIONS**

**ISD 197 School Board**

Non-Instructional Operations and Business Services

Contact: Director of Finance

### **721 UNIFORM GRANT GUIDANCE (UG) POLICY REGARDING FEDERAL REVENUE SOURCES**

#### **I. PURPOSE**

The purpose of this policy is to ensure compliance with the requirements of the federal Uniform Grant Guidance regulations by establishing uniform administrative requirements, cost principles, and audit requirements for federal grant awards received by the school district.

#### **~~H. DEFINITIONS~~**

##### **~~A. Grants~~**

- ~~1. “State-administered grants” are those grants that pass through a state agency such as the Minnesota Department of Education (MDE).~~
- ~~2. “Direct grants” are those grants that do not pass through another agency such as MDE and are awarded directly by the federal awarding agency to the grantee organization. These grants are usually discretionary grants that are awarded by the U.S. Department of Education (DOE) or by another federal awarding agency.~~

~~B. “Non-federal entity” means a state, local government, Indian tribe, institution of higher education, or nonprofit organization that carries out a federal award as a recipient or subrecipient.~~

~~C. “Federal award” has the meaning, depending on the context, in either paragraph 1. or 2. of this definition:~~

- ~~1. a. The federal financial assistance that a non-federal entity receives directly from a federal awarding agency or indirectly from a pass-through entity, as described in 2 C.F.R. § 200.101 (Applicability); or~~

b. ~~The cost-reimbursement contract under the federal Acquisition Regulations that a non-federal entity receives directly from a federal awarding agency or indirectly from a pass-through entity, as described in 2 C.F.R. § 200.101 (Applicability).~~

2. ~~The instrument setting forth the terms and conditions. The instrument is the grant agreement, cooperative agreement, other agreement for assistance covered in paragraph (b) of 2 C.F.R. § 200.40 (Federal Financial Assistance), or the cost-reimbursement contract awarded under the federal Acquisition Regulations. "Federal award" does not include other contracts that a federal agency uses to buy goods or services from a contractor or a contract to operate federal-government-owned, contractor-operated facilities.~~

D. ~~"Contract" means a legal instrument by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award. The term, as used in 2 C.F.R. Part 200, does not include a legal instrument, even if the non-federal entity considers it a contract, when the substance of the transaction meets the definition of a federal award or subaward.~~

E. Procurement Methods

1. ~~"Procurement by micro-purchase" is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (generally \$10,000, except as otherwise discussed in 48 C.F.R. Subpart 2.1 or as periodically adjusted for inflation).~~

2. ~~"Procurement by small purchase procedures" are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than \$175,000 (periodically adjusted for inflation).~~

3. ~~"Procurement by sealed bids (formal advertising)" is a publicly solicited and a firm, fixed-price contract (lump sum or unit price) awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is the lowest in price.~~

4. ~~"Procurement by competitive proposals" is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded. Competitive proposals are generally used when conditions are not appropriate for the use of sealed bids.~~

5. ~~"Procurement by noncompetitive proposals" is procurement through solicitation of a proposal from only one source.~~

F. ~~"Equipment" means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which exceeds the lesser of the capitalization level established by the non-federal entity for financial statement purposes, or \$5,000.~~

- G. ~~“Compensation for personal services” includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the federal award, including, but not necessarily limited to, wages and salaries. Compensation for personal services may also include fringe benefits which are addressed in 2 C.F.R. § 200.431 (Compensation - Fringe Benefits).~~
- H. ~~“Post-retirement health plans” refer to costs of health insurance or health services not included in a pension plan covered by 2 C.F.R. § 200.431(g) for retirees and their spouses, dependents, and survivors.~~
- I. ~~“Severance pay” is a payment in addition to regular salaries and wages by the non-federal entities to workers whose employment is being terminated. “Direct costs” are those costs that can be identified specifically with a particular final cost objective, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.~~
- J. ~~“Relocation costs” are costs incident to the permanent change of duty assignment (for an indefinite period or for a stated period not less than 12 months) of an existing employee or upon recruitment of a new employee.~~
- K. ~~“Travel costs” are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the school district.~~

## **II. DEFINITIONS**

- A. “Compensation for personal services” includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the federal award, including, but not necessarily limited to, wages and salaries. Compensation for personal services may also include fringe benefits which are addressed in 2 Code of Federal Regulations, section 200.431 (Compensation - Fringe Benefits).**
- B. “Contract” means a legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under a federal award. The term, as used in 2 Code of Federal Regulations, Part 200, does not include a legal instrument, even if the recipient or subrecipient considers it a contract, when the substance of the transaction meets the definition of a federal award or subaward.**
- C. “Direct costs” are those costs that can be identified specifically with a particular final cost objective, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.**
- D. “Equipment” means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which exceeds the lesser of the capitalization level established by the recipient or subrecipient for financial statement purposes, or \$10,000.**

**E. “Federal award” has the meaning, depending on the context, in either paragraph 1. or 2. of this definition:**

**1.**

**a. The federal financial assistance that a recipient or subrecipient receives directly from a federal awarding agency or indirectly from a pass-through entity, as described in 2 Code of Federal Regulations, section 200.101 (Applicability); or**

**b. The cost-reimbursement contract under the federal Acquisition Regulations that a recipient or subrecipient receives directly from a federal awarding agency or indirectly from a pass-through entity, as described in 2 Code of Federal Regulations, section 200.101 (Applicability).**

**2. The instrument setting forth the terms and conditions. The instrument is the grant agreement, cooperative agreement, other agreement for assistance covered in paragraph (b) of 2 Code of Federal Regulations, section 200.40 (Federal Financial Assistance), or the cost-reimbursement contract awarded under the federal Acquisition Regulations.**

**3. “Federal award” does not include other contracts that a federal agency uses to buy goods or services from a contractor or a contract to operate federal-government-owned, contractor-operated facilities.**

**F. Grants**

**1. “State-administered grants” are those grants that pass through a state agency such as the Minnesota Department of Education (MDE).**

**2. “Direct grants” are those grants that do not pass through another agency such as MDE and are awarded directly by the federal awarding agency to the grantee organization. These grants are usually discretionary grants that are awarded by the U.S. Department of Education (DOE) or by another federal awarding agency.**

**G. “Non-federal entity” means a state, local government, Indian tribe, institution of higher education, or nonprofit organization that carries out a federal award as a recipient or subrecipient.**

**H. “Post-retirement health plans” refer to costs of health insurance or health services not included in a pension plan covered by 2 Code of Federal Regulations, section 200.431(g) for retirees and their spouses, dependents, and survivors.**

**I. Procurement Methods**

**1. “Procurement by micro-purchase” is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (generally \$10,000, except as otherwise discussed in 48 Code of Federal Regulations, Subpart 2.1 or as periodically adjusted for inflation). [NOTE: Minnesota school districts may choose to increase their federal micro-purchase threshold to \$25,000, which would align with the Minnesota**

**limit. School districts choosing to adopt this increase must annually certify the higher threshold and the justification for using the higher threshold. Acceptable reasons for justification must meet one of the following criteria: (1) a qualification as a low-risk auditee, in accordance with the criteria established in 2 Code of Federal Regulations, section 200.520; (2) an annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or (3) a higher threshold consistent with state law.]**

- 2. “Procurement by simplified acquisitions procedures” are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than \$175,000 (periodically adjusted for inflation).**
  - 3. “Procurement by sealed bids (formal advertising)” is a publicly solicited and a firm, fixed-price contract (lump sum or unit price) awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is the lowest in price.**
  - 4. “Procurement by competitive proposals” is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded. Competitive proposals are generally used when conditions are not appropriate for the use of sealed bids.**
  - 5. “Procurement by noncompetitive proposals” is procurement through solicitation of a proposal from only one source.**
- J. “Relocation costs” are costs incident to the permanent change of duty assignment (for an indefinite period or for a stated period not less than 12 months) of an existing employee or upon recruitment of a new employee.**
- K. “Severance pay” is a payment in addition to regular salaries and wages by the non- federal entities to workers whose employment is being terminated.**
- L. “Travel costs” are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the school district.**

### **III. CONFLICT OF INTEREST**

#### **A. Employee Conflict of Interest**

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if they have a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of their immediate family, their partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The employees, officers, and agents of the school district

may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the school district may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by employees, officers, or agents of the school district.

B. Organizational Conflicts of Interest

The school district is unable or appears to be unable to be impartial in conducting a procurement action involving the related organization because of relationships with a parent company, affiliate, or subsidiary organization.

C. Disclosing Conflicts of Interest

The school district must disclose in writing any potential conflict of interest to MDE in accordance with applicable federal awarding agency policy.

**IV. ACCEPTABLE METHODS OF PROCUREMENT**

General Procurement Standards

- A. The school district must use its own documented procurement procedures which reflect applicable state laws, provided that the procurements conform to the applicable federal law and the standards identified in the Uniform Grant Guidance.
- B. The school district must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- C. The school district's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives and any other appropriate analysis to determine the most economical approach.
- D. The school district must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.
- E. The school district must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement; selection of the contract type; contractor selection or rejection; and the basis for the contract price.
- F. The school district alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all

contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the school district of any contractual responsibilities under its contracts.

- G. The school district must take all necessary affirmative steps to assure that **small businesses**, minority businesses, women's business enterprises, **veteran-owned businesses**, and labor surplus area firms are used when possible.

**H. Domestic Preference**

**The school district should, to the greatest extent practicable and consistent with law, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of 2 Code of Federal Regulations, part 200.322 must be included in all subawards, contracts, and purchase orders under Federal awards.**

**I. Procurement of Recovered Materials**

**The school district should, to the greatest extent practicable and consistent with law, purchase, acquire, or use products that can be reused, refurbished, or recycled; contain recycled content, are biobased, or are energy and water efficient; and are sustainable. This may include purchasing compostable items and other products and services that reduce the use of single-use plastic products.**

**J. Methods of Procurement**

The school district must use one of the following methods of procurement:

1. Procurement by micro-purchases. To the extent practicable, the school district must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the school district considers the price to be reasonable.
2. Procurement by ~~small-purchase~~ **simplified acquisitions** procedures. If ~~small purchase~~ **simplified acquisitions** procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.
3. Procurement by sealed bids (formal advertising).
4. Procurement by competitive proposals. If this method is used, the following requirements apply:
  - a. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;

- b. Proposals must be solicited from an adequate number of qualified sources;
  - c. The school district must have a written method for conducting technical evaluations of the proposals received and for selecting recipients;
  - d. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and
  - e. **The** school district may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method where price is not used as a selection factor can only be used in procurement of A/E professional services; it cannot be used to purchase other types of services, though A/E firms are a potential source to perform the proposed effort.
5. Procurement by noncompetitive proposals. Procurement by noncompetitive proposals may be used only when one or more of the following circumstances apply:
- a. **The aggregate amount of the procurement transaction does not exceed the micro-purchase threshold;**
  - b. The item is available only from a single source;
  - c. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
  - d. The DOE or MDE expressly authorizes noncompetitive proposals in response to a written request from the school district; or
  - e. After solicitation of a number of sources, competition is determined inadequate.

K. Competition

The school district must have written procedures for procurement transactions. These procedures must ensure that all solicitations:

- 1. Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product, or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When making a clear and accurate description of the technical

requirements is impractical or uneconomical, a “brand name or equivalent” description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and

2. Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.
- L. The school district must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the school district must not preclude potential bidders from qualifying during the solicitation period.
  - M. ~~Non-federal entities~~ **Recipients or subrecipients** are prohibited from contracting with or making subawards under “covered transactions” to parties that are suspended or debarred or whose principals are suspended or debarred. “Covered transactions” include procurement contracts for goods and services awarded under a grant or cooperative agreement that are expected to equal or exceed \$25,000.
  - N. All nonprocurement transactions entered into by a recipient (i.e., subawards to subrecipients), irrespective of award amount, are considered covered transactions, unless they are exempt as provided in 2 C.F.R. § 180.215.

## V. **MANAGING EQUIPMENT AND SAFEGUARDING ASSETS**

- A. Property Standards. The school district must, at a minimum, provide the equivalent insurance coverage for real property and equipment acquired or improved with federal funds as provided to property owned by the ~~non-federal entity~~ **recipient or subrecipient**. Federally owned property need not be insured unless required by the terms and conditions of the federal award.

The school district must adhere to the requirements concerning real property, equipment, supplies, and intangible property set forth in 2 C.F.R. §§ 200.311, 200.314, and 200.315.

- B. Equipment

Management requirements

Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a federal award, until disposition takes place will, at a minimum, meet the following requirements:

1. Property records must be maintained that include a description of the property; a serial number or other identification number; the source of the funding for the property (including the federal award identification number (FAIN)); who holds title; the acquisition date; the cost of the property; the percentage of the federal participation in the project costs for the federal award under which the property was acquired; the location, use, and

condition of the property; and any ultimate disposition data, including the date of disposition and sale price of the property.

2. A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
3. A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.
4. Adequate maintenance procedures must be developed to keep property in good condition.
5. If the school district is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

### **C. Cybersecurity**

**The school district must take reasonable cybersecurity and other measures to safeguard**

- 1. Personally identifiable information;**
- 2. Information that the federal agency or pass-through entity designates as sensitive; and**
- 3. Other information that the school district considers sensitive and is consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.**

## **VI. FINANCIAL MANAGEMENT REQUIREMENTS**

### **A. Financial Management**

The school district's financial management systems, including records documenting compliance with federal statutes, regulations, and the terms and conditions of the federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the federal statutes, regulations, and the terms and conditions of the federal award.

### **B. Payment**

The school district must be paid in advance, provided it maintains or demonstrates the willingness to maintain both written procedures that minimize the time elapsing between the transfer of funds and disbursement between the school district and the financial management systems that meet the standards for fund control.

Advance payments to a school district must be limited to the minimum amounts needed and timed to be in accordance with the actual, immediate cash requirements of the school district in carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the ~~non-federal entity~~ **recipient or subrecipient** for direct program or project costs and the proportionate share of any allowable indirect costs. The school district must make timely payment to contractors in accordance with the contract provisions.

C. Internal Controls

The school district must establish and maintain effective internal control over the federal award that provides reasonable assurance that the school district is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government,” issued by the Comptroller General of the United States, or the “Internal Control Integrated Framework,” issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

The school district must comply with **the United States Constitution**, federal statutes, regulations, and the terms and conditions of the federal award.

The school district must also evaluate and monitor the school district’s compliance with statutes, regulations, and the terms and conditions of the federal award.

The school district must also take prompt action when instances of noncompliance are identified, including noncompliance identified in audit findings.

The school district must take reasonable measures to safeguard protected personally identifiable information considered sensitive consistent with applicable federal and state laws regarding privacy and obligations of confidentiality.

VII. **ALLOWABLE USE OF FUNDS AND COST PRINCIPLES**

A. Allowable Use of Funds

The school district administration and school board will enforce appropriate procedures and penalties for program, compliance, and accounting staff responsible for the allocation of federal grant costs based on their allowability and their conformity with federal cost principles to determine the allowability of costs.

B. Definitions

1. “Allowable cost” means a cost that complies with all legal requirements that apply to a particular federal education program, including statutes, regulations, guidance, applications, and approved grant awards.
2. “Education Department General Administrative Regulations (EDGAR)”

means a compilation of regulations that apply to federal education programs. These regulations contain important rules governing the administration of federal education programs and include rules affecting the allowable use of federal funds (including rules regarding allowable costs, the period of availability of federal awards, documentation requirements, and grants management requirements). EDGAR can be accessed at: <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>.

3. “Omni Circular” or “2 C.F.R. Part 200s” or “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” means federal cost principles that provide standards for determining whether costs may be charged to federal grants.
4. “Advance payment” means a payment that a federal awarding agency or passthrough entity makes by any appropriate payment mechanism, including a predetermined payment schedule, before the ~~non-federal entity~~ **recipient or subrecipient** disburses the funds for program purposes.

C. Allowable Costs

The following items are costs that may be allowable under the 2 C.F.R. Part 200s under specific conditions:

1. Advisory councils;
2. Audit costs and related services;
3. Bonding costs;
4. Communication costs;
5. Compensation for personal services;
6. Depreciation and use allowances;
7. Employee morale, health, and welfare costs;
8. Equipment and other capital expenditures;
9. Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of federal programs;
10. Insurance and indemnification;
11. Maintenance, operations, and repairs;
12. Materials and supplies costs;
13. Meetings and conferences;

14. Memberships, subscriptions, and professional activity costs;
15. Security costs;
16. Professional service costs;
17. Proposal costs;
18. Publication and printing costs;
19. Rearrangement and alteration costs;
20. Rental costs of building and equipment;
21. Training costs; and
22. Travel costs.

D. Costs Forbidden by Federal Law

2 CFR Part 200s and EDGAR identify certain costs that may never be paid with federal funds. The following list provides examples of such costs. If a cost is on this list, it may not be supported with federal funds. The fact that a cost is not on this list does not mean it is necessarily permissible. Other important restrictions apply to federal funds, such as those items detailed in the 2 CFR Part 200s; thus, the following list is not exhaustive:

1. Advertising and public relations costs (with limited exceptions), including promotional items and memorabilia, models, gifts, and souvenirs;
2. Alcoholic beverages;
3. Bad debts;
4. Contingency provisions (with limited exceptions);
5. Fundraising and investment management costs (with limited exceptions);
6. Donations;
7. Contributions;
8. Entertainment (amusement, diversion, and social activities and any associated costs);
9. Fines and penalties;
10. General government expenses (with limited exceptions pertaining to Indian tribal governments and Councils of Government (COGs));

11. Goods or services for personal use;
12. Interest, except interest specifically stated in 2 C.F.R. § 200.441 as allowable;
13. Religious use;
14. The acquisition of real property (unless specifically permitted by programmatic statute or regulations, which is very rare in federal education programs);
15. Construction (unless specifically permitted by programmatic statute or regulations, which is very rare in federal education programs); and
16. **Tuition** charged or fees collected from students applied toward meeting matching, cost sharing, or maintenance of effort requirements of a program.

E. Program Allowability

1. Any cost paid with federal education funds must be permissible under the federal program that would support the cost.
2. Many federal education programs detail specific required and/or allowable uses of funds for that program. Issues such as eligibility, program beneficiaries, caps or restrictions on certain types of program expenses, other program expenses, and other program specific requirements must be considered when performing the programmatic analysis.
3. The two largest federal K-12 programs, Title I, Part A, and the Individuals with Disabilities Education Act (IDEA), do not contain a use of funds section delineating the allowable uses of funds under those programs. In those cases, costs must be consistent with the purposes of the program in order to be allowable.

F. Federal Cost Principles

1. ~~The Omni Circular~~ **2 C.F.R., part 200s** defines the parameters for the permissible uses of federal funds. While many requirements are contained in ~~the Omni Circular~~ **2 C.F.R., part 200s**, it includes five core principles that serve as an important guide for effective grant management. These core principles require all costs to be:
  - a. Necessary for the proper and efficient performance or administration of the program.
  - b. Reasonable. An outside observer should clearly understand why a decision to spend money on a specific cost made sense in light of the cost, needs, and requirements of the program.
  - c. Allocable to the federal program that paid for the cost. A program must

benefit in proportion to the amount charged to the federal program – for example, if a teacher is paid 50% with Title I funds, the teacher must work with the Title I program/students at least 50% of the time. Recipients also need to be able to track items or services purchased with federal funds so they can prove they were used for federal program purposes.

- d. Authorized under state and local rules. All actions carried out with federal funds must be authorized and not prohibited by state and local laws and policies.
- e. Adequately documented. A recipient must maintain proper documentation so as to provide evidence to monitors, auditors, or other oversight entities of how the funds were spent over the lifecycle of the grant.

#### G. Program Specific Fiscal Rules

~~The Omni Circular~~ **2 C.F.R., part 200s** also contains specific rules on selected items of costs. Costs must comply with these rules in order to be paid with federal funds.

1. All federal education programs have certain program specific fiscal rules that apply. Determining which rules apply depends on the program; however, rules such as supplement, not supplant, maintenance of effort, comparability, caps on certain uses of funds, etc., have an important impact when analyzing whether a particular cost is permissible.
2. Many state-administered programs require local education agencies (LEAs) to use federal program funds to supplement the amount of state, local, and, in some cases, other federal funds they spend on education costs and not to supplant (or replace) those funds. Generally, the “supplement, not supplant” provision means that federal funds must be used to supplement the level of funds from non-federal sources by providing additional services, staff, programs, or materials. In other words, federal funds normally cannot be used to pay for things that would otherwise be paid for with state or local funds (and, in some cases, with other federal funds).
3. Auditors generally presume supplanting has occurred in three situations:
  - a. School district uses federal funds to provide services that the school district is required to make available under other federal, state, or local laws.
  - b. School district uses federal funds to provide services that the school district provided with state or local funds in the prior year.
  - c. School district uses Title I, Part A, or Migrant Education Program funds to provide the same services to Title I or Migrant students that the school district provides with state or local funds to nonparticipating students.
4. These presumptions apply differently in different federal programs and also in

schoolwide program schools. Staff should be familiar with the supplement not supplant provisions applicable to their program.

H. Approved Plans, Budgets, and Special Conditions

2. As required by ~~the Omni Circular~~ **2 C.F.R., part 200s**, all costs must be consistent with approved program plans and budgets.
3. Costs must also be consistent with all terms and conditions of federal awards, including any special conditions imposed on the school district's grants.

I. Training

- A. The school district will provide training on the allowable use of federal funds to all staff involved in federal programs.
- B. The school district will promote coordination between all staff involved in federal programs through activities, such as routine staff meetings and training sessions.

J. Employee Sanctions

Any school district employee who violates this policy will be subject to discipline, as appropriate, up to and including the termination of employment.

K. Mandatory Disclosures

**The school district must promptly disclose whenever, in connection with the Federal award (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in 18 United States Code or a violation of the civil False Claims Act (31 United States Code, sections 3729-3733).**

**The disclosure must be made in writing to the Federal agency, the agency's Office of the Inspector General, and pass-through entity (if applicable). School districts are also required to report matters related to recipient integrity and performance in accordance with Appendix XII of this part. Failure to make required disclosures can result in any of the remedies described in 2 C.F.R. § 200.339.**

VIII. **COMPENSATION – PERSONAL SERVICES EXPENSES AND REPORTING**

A. Compensation – Personal Services

Costs of compensation are allowable to the extent that they satisfy the specific requirements of the Uniform Grant Guidance and that the total compensation for individual employees:

1. Is reasonable for the services rendered and conforms to the established written policy of the school district consistently applied to both federal and non-federal activities; and

2. Follows an appointment made in accordance with a school district's written policies and meets the requirements of federal statute, where applicable.

Unless an arrangement is specifically authorized by a federal awarding agency, a school district must follow its written non-federal, entity-wide policies and practices concerning the permissible extent of professional services that can be provided outside the school district for non-organizational compensation.

B. Compensation – Fringe Benefits

1. During leave.

The costs of fringe benefits in the form of regular compensation paid to employees during periods of authorized absences from the job, such as for annual leave, family-related leave, sick leave, holidays, court leave, military leave, administrative leave, and other similar benefits, are allowable if all of the following criteria are met:

- a. They are provided under established written leave policies;
  - b. The costs are equitably allocated to all related activities, including federal awards; and
  - c. The accounting basis (cash or accrual) selected for costing each type of leave is consistently followed by the school district.
2. The costs of fringe benefits in the form of employer contributions or expenses for social security; employee life, health, unemployment, and worker's compensation insurance (except as indicated in 2 C.F.R. § 200.447(d)); pension plan costs; and other similar benefits are allowable, provided such benefits are granted under established written policies. Such benefits must be allocated to federal awards and all other activities in a manner consistent with the pattern of benefits attributable to the individuals or group(s) of employees whose salaries and wages are chargeable to such federal awards and other activities and charged as direct or indirect costs in accordance with the school district's accounting practices.
  3. Actual claims paid to or on behalf of employees or former employees for workers' compensation, unemployment compensation, severance pay, and similar employee benefits (e.g., post-retirement health benefits) are allowable in the year of payment provided that the school district follows a consistent costing policy.
  4. Pension plan costs may be computed using a pay-as-you-go method or an acceptable actuarial cost method in accordance with the written policies of the school district.
  5. Post-retirement costs may be computed using a pay-as-you-go method or an acceptable actuarial cost method in accordance with established written policies of the school district.

6. Costs of severance pay are allowable only to the extent that, in each case, severance pay is required by law; employer-employee agreement; established policy that constitutes, in effect, an implied agreement on the school district's part; or circumstances of the particular employment.

C. Insurance and Indemnification

Types and extent and cost of coverage are in accordance with the school district's policy and sound business practice.

D. Recruiting Costs

Short-term, travel visa costs (as opposed to longer-term, immigration visas) may be directly charged to a federal award, so long as they are:

1. Critical and necessary for the conduct of the project;
2. Allowable under the cost principles set forth in the Uniform Grant Guidance;
3. Consistent with the school district's cost accounting practices and school district policy; and
4. Meeting the definition of "direct cost" in the applicable cost principles of the Uniform Grant Guidance.

E. Relocation Costs of Employees

Relocation costs are allowable, subject to the limitations described below, provided that reimbursement to the employee is in accordance with the school district's reimbursement policy.

F. Travel Costs

Travel costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in the school district's non-federally funded activities and in accordance with the school district's reimbursement policies.

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the school district in its regular operations according to the school district's written reimbursement and/or travel policies.

In addition, when costs are charged directly to the federal award, documentation must justify the following:

1. Participation of the individual is necessary to the federal award; and

2. The costs are reasonable and consistent with the school district's established travel policy.

Temporary dependent care costs above and beyond regular dependent care that directly results from travel to conferences is allowable provided the costs are:

1. A direct result of the individual's travel for the federal award;
2. Consistent with the school district's documented travel policy for all school district travel; and
3. Only temporary during the travel period.

## **IX. SUB-RECIPIENT MONITORING**

### **A. Federal Award Identification**

**The school district will ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and, if any of these data elements change, include the changes in subsequent subaward modification. Required information includes:**

1. **Subrecipient name (which must match the name associated with its unique entity identifier);**
2. **Subrecipient's unique entity identifier;**
3. **Federal Award Identification Number (FAIN);**
4. **Federal Award Date (see §200.39 Federal award date) to the recipient by the Federal agency;**
5. **Subaward Period of Performance Start and End Date;**
6. **Amount of Federal Funds Obligated by this action by the pass-through entity to the subrecipient;**
7. **Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity including the current obligation;**
8. **Total Amount of the Federal Award committed to the subrecipient by the pass-through entity;**
9. **Federal award project description, as required to be responsive to the Federal Funding**
10. **Accountability and Transparency Act (FFATA);**
11. **Name of Federal awarding agency, pass-through entity, and contact**

information for awarding official of the Pass-through entity;

12. Assistance Listing Number (formerly CFDA #) and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the Assistance Listing number at time of disbursement; Identification of whether the award is R&D; and
13. Indirect cost rate for the Federal award (including if the de minimis rate is charged per §200.414 Indirect (F&A) costs).

**B. Written Risk Assessment**

The school district will perform a written risk assessment of each subrecipient, evaluating their risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in 2 CFR 200.332.

**C. Ongoing Monitoring**

The school district will monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.

**D. Audit**

The school district will verify that every subrecipient is audited as required by Subpart F of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in §200.501.

- Legal References:**
- 2 C.F.R. § 200.12 (Capital Assets)
  - 2 C.F.R. § 200.112 (Conflict of Interest)
  - 2 C.F.R. § 200.113 (Mandatory Disclosures)
  - 2 C.F.R. § 200.205(d) (Federal Awarding Agency Review of Risk Posed by Applicants **Merit of Proposals**)
  - 2 C.F.R. § 200.212~~4~~ (Suspension and Debarment)
  - 2 C.F.R. § 200.300(b) (Statutory and National Policy Requirements)
  - 2 C.F.R. § 200.302 (Financial Management)
  - 2 C.F.R. § 200.303 (Internal Controls)
  - 2 C.F.R. § 200.305(b)(1) (**Federal** Payment)
  - 2 C.F.R. § 200.310 (Insurance Coverage)
  - 2 C.F.R. § 200.311 (Real Property)
  - 2 C.F.R. § 200.312 (Federally-owned and Exempt Property)**
  - 2 C.F.R. § 200.313(d) (Equipment)
  - 2 C.F.R. § 200.314 (Supplies)
  - 2 C.F.R. § 200.315 (Intangible Property)
  - 2 C.F.R. § 200.318 (General Procurement Standards)

2 C.F.R. § 200.319(c) (Competition)  
2 C.F.R. § 200.320 (Methods of Procurement to be Followed)  
2 C.F.R. § 200.321 (Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms)  
2 C.F.R. § 200.328 (~~Monitoring and Reporting Program Performance~~  
**Financial Reporting**)  
2 C.F.R. § 200.338~~9~~ (Remedies for Noncompliance)  
2 C.F.R. § 200.403(c) (Factors Affecting Allowability of Costs)  
2 C.F.R. § 200.430 (Compensation – Personal Services)  
2 C.F.R. § 200.431 (Compensation – Fringe Benefits)  
2 C.F.R. § 200.447 (Insurance and Indemnification)  
2 C.F.R. § 200.463 (Recruiting Costs)  
2 C.F.R. § 200.464 (Relocation Costs of Employees)  
2 C.F.R. § 200.473 (Transportation Costs)  
2 C.F.R. § 200.474 (Travel Costs)

***Cross References:*** School District Policy 208 (Development, Adoption, and Implementation of Policies)  
School District Policy 210 (Conflict of Interest – School Board Members)  
School District Policy 412 (Expense Reimbursement)  
School District Policy 701 (Establishment and Adoption of School District Budget)  
School District Policy 701.1 (Modification of School District Budget)  
School District Policy 702 (Accounting)  
School District Policy 703 (Annual Audit)

**POLICY ADOPTED:** September 19, 2016  
**POLICY REVIEWED/REVISED:** August 19, 2019; January 23, 2023;  
**Monitoring Method:** Administrative Review  
**Monitoring Frequency:** Every three years