



St. Croix Preparatory Academy
Board Meeting Agenda
May 19, 2026

1. Call to Order	
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I. Board Election Update	
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L. Policies - 1st Reading	90
721 - Procurement Policy (MSBA updates)	
M. Board Training	
1. Fiduciary Obligations	127
6. Adjourn Meeting	



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ANNUAL BOARD CALENDAR 2025-2026

July	Responsible	Notes/Status
Public Hearing on Student Fees	Bus Office/Finance	
Family Handbook Approval	J. Fuchs	
Seat New Board Members	Board Chair	
Foundation Update	M. Davis	
Conflict of Interest Form Disclosure	Bus Office/Finance	
Annual Finance Designations for Next Year <ul style="list-style-type: none"> ● Identified Official with Authority ● Official Newspaper ● Designation of Depository ● Account Signatories ● Collateralize Funds in Excess of FDIC Insurance ● Delegation of Authority to Make Electronic Funds Transfers 	Board Chair	

August	Responsible	Notes/Status
Forward Together Retreat (08/07 and 08/08)	Succession Committee	
ByLaws Training	Governance	

September	Responsible	Notes/Status
Status of School Opening/Quarterly Report	Lower School Middle School Upper School Student Services	
Review of MCA Test Scores	J. Fuchs	
MN State Statute Training	Governance	
Emergency Operations Plan Approval	Crisis Team	Moving to October due to policy updates needed and work on a crisis plan.
MDE Assurance of Compliance	J. Fuchs	
Q-Comp Goals	AC/Q-Comp Leaders	
Unaudited Financials FY 25 - Review	EDoF	

October	Responsible	Notes/Status
Financial Statement Review	Bus Office/Finance	
Foundation Update	M. Davis	
Quarterly Report	Activities Department	
Bi-Annual Report	Human Resources	
Bi-Annual Report	Academic Coordinators	
Annual Report Approval (if ready)	J. Fuchs	
World's Best Workforce Approval (if ready)	J. Fuchs	

November	Responsible	Notes/Status
Snow Removal (Facilities) - approval for contract.	Bill Blotske	
Bi-Annual Report	Communications and 3 Events Coordinator	

Policy Approval (Consent Agenda and 1st and 2nd read approval)	Chair	Investment Policy, done.
Policy 1st Read (Governance)	Governance Committee	
Governance Notes	Governance Committee	
Strategic Planning Notes	T. Gulbrasnen	
Finance Committee Notes	D. Smith	
Quarterly Financial Report	Bus Office/Finance	
MN State Statute Training (124E)	T. Gulbransen	

December	Responsible	Notes/Status
Affiliated Building Company Training	Bus Office/Finance	
Audit Acceptance	Bus Office/Finance	
FSCPA and Building Overview	B. Blotske	
Quarterly Report	Lower School Middle School Upper School Student Services	

January	Responsible	Notes/Status
Strategic Plan Discussion	Strategic Planning Team	
Board Election Timeframe Discussion	Governance	
Food Services Report	M. Thole	
Technology Report	C. Olson	
Quarterly Report	Activities Department	

February	Responsible	Notes/Status
Financial Statement Review	Bus Office/Finance	

Board Election Timeframe Discussion	Governance	
Approve School Calendar	J. Fuchs	
AIPAC concurrence/noncurrence	D. Thompson	

March	Responsible	Notes/Status
Approve Open Enrollment Period for Next Year	J. Fuchs	
Approve Board Calendar for Next Year <ul style="list-style-type: none"> • Meetings • Election • Retreat 	Board	
Board Election Status & Time Frame	Governance	
Quarterly Check-In	Lower School Middle School Upper School Student Services	
Compensation Plan Introduction	T. Smith	
Benefits Package Introduction	T. Smith	

April	Responsible	Notes/Status
Annual Budget Introduction	Bus Office/Finance	
Compensation Plan Approval	T. Smith	
Benefits Plan Approval	T. Smith	
Bi-Annual Report	Human Resources	
Quarterly Report	Activities Department	
Board Election Status & Time Frame	Governance	

May	Responsible	Notes/Status
Q Comp Report Presentation/Approval Bi-Annual Report	Academic Coordinators	
Financial Statement Review	5 Bus Office/Finance	

Board Election Update	Governance	
Approve Annual Budget	Bus Office/Finance	
Curriculum Advisory Update (No approval)	J. Fuchs	
Literacy Plan	D. Thompson	
Bi-Annual Report	Communications and Events Coordinator	

June	Responsible	Notes/Status
Public Hearing on Fees – 2026	Bus Office/Finance	
End of the Year Wrap Up Report	Lower School Middle School Upper School Student Services Activities Department	
New Board Member Training	Governance	
Introduction of Family Handbook	J. Fuchs	
Introduction of Employee Handbook	T. Smith	
Annual Finance Designations for Next Year <ul style="list-style-type: none"> ● Identified Official with Authority <ul style="list-style-type: none"> ● Official Newspaper ● Designation of Depository ● Account Signatories ● Collateralize Funds in Excess of FDIC Insurance ● Delegation of Authority to Make Electronic Funds Transfers 	Board Chair	

Members Present: T. Gulbransen (Chair), Bob Hajlo (Vice-Chair), D. Smith (Treasurer), A. Galati, (Secretary), J. Johnson, R. Thorson, H. Gonzalez, K. Osberghaus

Members Absent: None

Remote Board Members: J. Johnson

Ex-officio Members Present: J. Fuchs (Executive Director)

Board Clerk: Janel Coleman

Guests: None

1. Call to order: T. Gulbransen called the meeting to order at **6:00 PM**.
2. Open Forum - None
3. [Board Calendar](#)
4. **Consent Agenda**
 - a. Board Minutes
 - i. [April 7, 2026 Minutes](#)
 - b. Executive Director's Report
 1. [Executive Director's Report April 28, 2026](#) - J. Fuchs
 - c. [Cybersecurity Policy Quote: Beazley Breach Response 5.0](#)
 - d. [EMC Casualty Insurance](#)
 - i. Increase: \$17, 347
 - e. [Aviben 403\(b\) Administration Participation Agreement](#): New \$100 monthly
 - f. [Kept COBRA TPA Service Agreement: New COBRA provider](#)
 - g. Governance Policies for Approval
 - i. [Family and Medical Leave](#)

- ii. [211 - Criminal or Civil Action Against Charter School, School Board Member, Employee, or Student \(no previous policy\)](#)
 - iii. [Protection and Privacy of Pupil Records](#)
 - iv. [Literacy and Read Act](#)
 - v. [Equal Access to Charter School Facilities](#)
 - vi. [519 - Interviews of Students by Outside Agencies \(no previous policy\)](#)
 - vii. [Literacy and the READ Act](#)
 - viii. [Equal Access to Charter School Facilities](#)
- Motion to Approve the Consent Agenda: A. Galati
 - Second: D. Smith
 - Approved: All

5. Agenda

- a. Financial Statements Review
 - i. [FY26 Revised Budget](#)
 - ii. [Balance Sheet - 3/31/26](#)
 - iii. [Cash Flow - 3/31/26](#)
 - iv. [Budget Update - 3/31/26](#)
- b. [Director's Report: Activities - April 2026](#)
- c. [SCPA Foundation Report - April 2026](#)
- d. Benefits Package for FY27 - Introduction - T. Smith
- e. [Human Resources Bi-Annual Report - April 2026](#)
 - i. Motion to approve: Approve FY27 benefit renewal recommendations: Bob Hajlo
 - a. Medical: +13.6% (18 month cycle)
 - b. Dental: +4.6% (with a possible slight increase TBD)
 - c. Vision: 0% (rate guaranteed through 7/1/2027)

- d. Nice Healthcare: \$40 PEPM (option to lock 2-year rate via prepayment)
- e. **Kept:** COBRA TPA transition
- f. Aviben: Addition of 403(b) TPA
 - ii. Second: A. Galati
 - iii. Motion Approved: All
- f. [Finance Committee Update](#)
- g. Board Election Status and Timeframe
 - i. Everything is on track for the May 4 and 5th elections.
- h. [5 Year Strategic Planning Goal Tracking](#)
- i. [Transportation Update for SCPA](#)
- j. Policies - First Reading
 - i. [513 - Student Promotion, Retention, and Program Design](#)
 - ii. [613 - Graduation Requirements](#)

Adjournment: 7:46 PM

- Motion to adjourn: A. Galati
- Second: J. Johnson
- Approved: All

Respectfully Submitted by A. Galati, St. Croix Preparatory Academy Board Secretary



Executive Director's Report to the Board

Date of Report: May 19, 2026
Report Prepared By: Jenn Fuchs, Ph.D.

Priority 1: Academic Excellence

Focus: Alignment of curriculum, continuous improvement, and evolving needs.

- **Curriculum:** Seeking Board approval for adoption of Social Studies curriculum purchase.
- **Assessments:** Completed State MCA testing. DIBELS and IXL will continue through the end of the school year and preliminary data has already been reported to stakeholders.
- **AP Testing:** Advanced Placement (AP) testing finished on May 15.

Priority 2: Culture and Organizational Alignment

Focus: Unified culture, safety, shared norms, and policy compliance.

- **Celebrations and Recognition:** Celebrated student achievements during the Award Ceremony, MS/US Marathon Reward Field Day, Music Concerts, and Celebration of Service Day.

Priority 3: People and Professional Excellence

Focus: Developing faculty, investing in people, and professional growth.

- **Staff Development:** Final meeting with the Staff Development Committee to review the survey results. We discussed themes for 26-27.
- **Leadership Networking & Advocacy:** Engaged with the Minnesota Association of Charter Schools (MACS) about ADSIS audits.

Priority 4: Financial Sustainability and Stewardship

Focus: Stewardship, diversifying revenue, and aligning resources.

- **Financial Management:**
 - Consulted with the Finance Committee and School Management Services (Todd Netzke) regarding ongoing financial oversight and the FY27 budget.

Priority 5: Strategic Communication and Brand Development

Focus: Trust, transparency, and telling the school's story.

- **Internal Communication:** Created communication for staff that provided timelines for position and salary notifications.

ST. CROIX PREPARATORY ACADEMY

Adopted: 02/17/2026

MSBA/MASA Model Policy 613 Charter

Orig. 2022 (as Charter Policy)

Revised: 02/08/2026

Rev. 2026

Revised:

613 GRADUATION REQUIREMENTS

I. PURPOSE

The purpose of this policy is to set forth requirements for graduation from the charter school.

II. GENERAL STATEMENT OF POLICY

The policy of the charter school is that all students must demonstrate, as determined by the charter school, their satisfactory completion of the credit requirements and their understanding of academic standards. The charter school must adopt graduation requirements that meet or exceed state graduation requirements established in law or rule.

III. DEFINITIONS

- A. "Credit" means a student's successful completion of an academic year of study or a student's mastery of the applicable subject matter, as determined by the charter school.
- B. "English language learners" or "ELL" student means an individual whose first language is not English and whose test performance may be negatively impacted by lack of English language proficiency.
- C. "Individualized Education Program" or "IEP" means a written statement developed for a student eligible by law for special education and services.
- D. "Required standard" means a statewide adopted expectation for student learning in the content areas of language arts, mathematics, science, social studies, physical education, health, and the arts. Locally developed academic standards in health apply until statewide rules implementing statewide health standards under Minnesota Statutes, section 120B.021, subdivision 3, are required to be implemented in the classroom.
- E. "Section 504 Accommodation" means the defined appropriate accommodations or modifications that must be made in the school environment to address the needs of an individual student with disabilities.

IV. CHARTER SCHOOL ASSESSMENT COORDINATOR

Principals shall be named the Charter School Assessment Coordinators. Said person shall be in charge of all test procedures and shall bring recommendations to the school board annually for approval.

V. ASSESSMENT GRADUATION REQUIREMENTS

A. Graduation Requirements

Students' state graduation requirements, based on a longitudinal, systematic approach to student education and career planning, assessment, instructional support, and evaluation, include the following:

1. Achievement and career and college readiness in mathematics, reading, and

writing, to the extent available, to monitor students' continuous development of and growth in requisite knowledge and skills; analyze students' progress and performance levels, identifying students' academic strengths and diagnosing areas where students require curriculum or instructional adjustments, targeted interventions, or remediation; and, based on analysis of students' progress and performance data, determine students' learning and instructional needs and the instructional tools and best practices that support academic rigor for the student.

2. Consistent with this paragraph and Minnesota Statutes, section 120B.125 (see *Policy 604, Section II.H.*), age-appropriate exploration and planning activities and career assessments to encourage students to identify personally relevant career interests and aptitudes and help students and their families develop a regularly reexamined transition plan for postsecondary education or employment without need for postsecondary remediation.
3. Based on appropriate state guidelines, students with an IEP may satisfy state graduation requirements by achieving an individual score on the state-identified alternative assessments.

B. Targeted Instruction Plan

1. A student must receive targeted, relevant, academically rigorous, and resourced instruction which may include a targeted instruction and intervention plan focused on improving the student's knowledge and skills in core subjects so that the student has a reasonable chance to succeed in a career or college without need for postsecondary remediation.
2. Consistent with Minnesota Statutes, sections 120B.13, 124D.09, 124D.091, 124F.08, and related sections, an enrolling school or district must actively encourage a student in grade 11 or 12 who is identified as academically ready for a career or college to participate in courses and programs awarding college credit to high school students. Students are not required to achieve a specified score or level of proficiency on an assessment under this subdivision to graduate from high school.
3. As appropriate, students through grade 12 must continue to participate in targeted instruction, intervention, or remediation and be encouraged to participate in courses awarding college credit to high school students.

- C. A student's progress toward career and college readiness must be recorded on the student's high school transcript.

VI. GRADUATION CREDIT REQUIREMENTS

Students must successfully complete, as determined by the charter school, the following high school level credits for graduation:

A. Credit Requirements

1. Four (4) credits of language arts sufficient to satisfy all academic standards in English language arts;
2. Three (4) credits of mathematics, sufficient to satisfy all of the academic standards in mathematics;
3. Three (4) credits of science, including one (1) credit to satisfy all the earth and space science standards for grades 9 through 12, one (1) credit to satisfy all the life science standards for grades 9 through 12, and one (1) credit to satisfy

all the chemistry and one (1) credit to satisfy all the physics standards for grades 9 through 12;

4. Four (4) credits of social studies, encompassing at least United States history, World History, geography, government and citizenship, in either grade 11 or 12 for students beginning in grade 9 in the 2025-2026 school year and later or an advanced placement, international baccalaureate, or other rigorous course on government and citizenship under Minnesota Statutes, section 120B.21, subdivision 1a, and a combination of other credits encompassing at least United States history, geography, government and citizenship, world history, and economics sufficient to satisfy all of the academic standards in social studies;
5. Two (2) credits in the arts sufficient to satisfy all of the state or local academic standards in the arts;
6. One (1) credit in physical education to satisfy all of the state or local academic physical education and health standards; and
7. A minimum of seven (7) elective credits.
8. Students who begin grade 9 in the 2024-2025 school year and later must successfully complete a course for credit in personal finance in grade 10, 11, or 12. A teacher of a personal finance course that satisfies the graduation requirement must have a field license or out-of-field permission in agricultural education, business, family and consumer science, social studies, or math.

B. Credit equivalencies

1. A one-half (.5) credit of economics taught in a school's agricultural, food, and natural resources education or business education program or department may fulfill a one-half (.5) credit in social studies under Paragraph A.4., above, if the credit is sufficient to satisfy all of the academic standards in economics.
2. An agriculture science or career and technical education credit may fulfill the elective science credit required under Paragraph A.3., above, if the credit meets the state physical science, life science, earth and space science, chemistry, or physics academic standards or a combination of these academic standards as approved by the charter school. An agriculture or career and technical education credit may fulfill the credit in chemistry or physics required under Paragraph A.3, above, if the credit meets the state chemistry or physics academic standards as approved by the charter school. A student must satisfy either all of the chemistry academic standards or all of the physics academic standards prior to graduation. An agriculture science or career and technical education credit may not fulfill the required biology credit under Paragraph A.3, above.
3. A career and technical education credit may fulfill a mathematics or arts credit requirement under Paragraph A.2. or Paragraph A.5, above.
4. A computer science credit may fulfill a mathematics credit requirement under Paragraph A.2, above, if the credit meets state academic standards in mathematics.
5. A Project Lead the Way credit may fulfill a mathematics or science credit requirement under Paragraph A.2. or Paragraph A.3, above, if the credit meets the state academic standards in mathematics or science.
6. An ethnic studies course may fulfill a social studies, language arts, arts, math, or science credit if the course meets the applicable state academic standards.

An ethnic studies course may fulfill an elective credit if the course meets applicable local standards or other requirements.

VII. GRADUATION STANDARDS REQUIREMENTS

- A. All students must demonstrate their understanding of the following academic standards:
 - 1. Charter School Standards, Health (K-12);
 - 2. Charter School Standards, Career and Technical Education (K-12); and
 - 3. Charter School Standards, World Languages (K-12).
- B. Academic standards in health, world languages, and career and technical education will be reviewed on an annual basis.* A charter school must use the current world languages standards developed by the American Council on the Teaching of Foreign Languages.

* Reviews are required to be conducted on a periodic basis. Therefore, this time period may be changed to accommodate individual charter school needs.
- C. All students must satisfactorily complete the following required Academic Standards in accordance with the standards developed by the Minnesota Department of Education (MDE):
 - 1. Minnesota Academic Standards, English Language Arts K-12;
 - 2. Minnesota Academic Standards, Mathematics K-12;
 - 3. Minnesota Academic Standards, Science K-12;
 - 4. Minnesota Academic Standards, Social Studies K-12; and
 - 5. Minnesota Academic Standards, Physical Education K-12.
- D. State standards in the Arts K-12 are available, or charter schools may choose to develop their own standards.
- E. The academic standards for language arts, mathematics, and science apply to all students except the very few students with extreme cognitive or physical impairments for whom an IEP team has determined that the required academic standards are inappropriate. An IEP team that makes this determination must establish alternative standards.

VIII. EARLY GRADUATION

Students may be considered for early graduation, as provided for within Minnesota Statutes, section 120B.07, upon meeting the following conditions:

- A. All course or standards and credit requirements must be met;
- B. The principal or designee shall conduct an interview with the student and parent or guardian, familiarize the parties with opportunities available in post-secondary education, and arrive at a timely decision; and
- C. The principal's decision shall be in writing and may be subject to review by the executive director and school board.

- Legal References:** Minn. Stat. § 120B.018 (Definitions)
Minn. Stat. § 120B.02 (Educational Expectations and Graduation Requirements for Minnesota’s Students)
Minn. Stat. § 120B.021 (Required Academic Standards)
Minn. Stat. § 120B.023 (Benchmarks)
Minn. Stat. § 120B.024 (Credits)
Minn. Stat. § 120B.07 (Early Graduation)
Minn. Stat. § 120B.11 (School District Process for Reviewing Curriculum, Instruction, and Student Achievement Goals; Striving for Comprehensive Achievement and Civic Readiness)
Minn. Stat. § 120B.125 (Planning for Students’ Successful Transition to Postsecondary Education and Employment; Personal Learning Plans)
Minn. Stat. § 120B.13 (Advanced Placement and International Baccalaureate Programs)
Minn. Stat. § 120B.30 (General Requirements; Statewide Assessments)
Minn. Stat. § 120B.303 (Assessment Graduation Requirements)
Minn. Stat. § 120B.307 (College and Career Readiness)
Minn. Stat. § 124D.09 (Postsecondary Enrollment Options Act)
Minn. Stat. § 124D.091 (Concurrent Enrollment Program Aid)
Minn. Stat. § 124F.08 (Education and Employment Transitions Partnerships)
Minn. Stat. § 124E.03 (Applicable Law)
Minn. Rules Part 3501.0660 (Academic Standards for Kindergarten through Grade 12 [Language Arts])
Minn. Rules Parts 3501.0700-3501.0750 (Academic Standards for Mathematics)
Minn. Rules Part 3501.0820 (Academic Arts Standards for Kindergarten through Grade 12)
Minn. Rules Parts 3501.0900-3501.0960 (Academic Standards in Science)
Minn. Rules Parts 3501.1200-1210 (Academic Standards for English Language Development)
Minn. Rules Parts 3501.1300-3501.1345 (Academic Standards for Social Studies)
Minn. Rules Parts 3501.1400-3501.1410 (Academic Standards for Physical Education)
20 U.S.C. § 6301, *et seq.* (Every Student Succeeds Act)
- Cross References:** MSBA/MASA Model Policy 104 (Charter School Mission Statement)
MSBA/MASA Model Policy 601 (Charter School Curriculum and Instruction Goals)
MSBA/MASA Model Policy 614 (Charter School Testing Plan and Procedure)
MSBA/MASA Model Policy 615 (Testing Accommodations, Modifications, and Exemptions for IEPs, Section 504 Plans, and LEP Students)
MSBA/MASA Model Policy 616 (Charter School System Accountability)
- Resources:** Minnesota House of Representatives: [Minnesota’s Graduation Requirements](#) (November 2025) (accessed 01/29/26)

ST. CROIX PREPARATORY ACADEMY

Adopted: 9/16/2004

MSBA/MASA Model Policy 513 Charter
Orig. 2022 (as Charter Policy)
Rev. 2025

Revised: _____

513 STUDENT PROMOTION, RETENTION, AND PROGRAM DESIGN

I. PURPOSE

The purpose of this policy is to provide guidance to professional staff, parents, and students regarding student promotion, retention, and program design.

II. GENERAL STATEMENT OF POLICY

The charter school board expects all students to achieve at an acceptable level of proficiency. Parental assistance, tutorial and remedial programs, counseling, and other appropriate services shall be coordinated and utilized to the greatest extent possible to help students succeed in school.

A. Promotion

Students who achieve at levels deemed acceptable by local and state standards shall be promoted to the next grade level at the completion of each school year.

B. Retention

Retention of a student may be considered when professional staff and parents feel that it is in the best interest of the student. Physical development, maturity, and emotional factors shall be considered, as well as scholastic achievement. The Executive Director's decision shall be final.

C. Program Design

1. The Executive Director, with participation of the professional staff and parents, shall develop and implement programs to challenge students that are consistent with the needs of students at every level. A process to assess and evaluate students for program assignment shall be developed in coordination with such programs. Opportunities for special programs and placement outside of the charter school shall also be developed as additional options. All programs will be aligned with creating comprehensive achievement and civic readiness.
2. The charter school may identify students, locally develop programs and services addressing instructional and affective needs, provide staff development, and evaluate programs to provide gifted and talented students with challenging and appropriate educational programs and services.
3. The charter school must adopt guidelines for assessing and identifying students for participation in gifted and talented programs and services consistent with Minnesota Statutes, section 120B.11. The guidelines should include the use of:
 - a. multiple objective criteria; and
 - b. assessments and procedures that are valid and reliable, fair, and based on current theory and research. Assessments and procedures should be sensitive to under-represented groups, including, but not limited to, low-income, minority, twice-exceptional, and English learners.

4. The charter school must adopt procedures for the academic acceleration of gifted and talented students. These procedures will include how the charter school will:
 - a. assess a student's readiness and motivation for acceleration; and
 - b. match the level, complexity, and pace of the curriculum to a student to achieve the best type of academic acceleration for that student.

5. The charter school must adopt procedures consistent with Minnesota Statutes, section 124D.02 for early admission to kindergarten or first grade of gifted or talented learners consistent with Minnesota Statutes, section 120B.11, subdivision 2, clause (2). The procedures must be sensitive to underrepresented groups.

Legal References: Minn. Stat. § 120B.11 (School District Process for Reviewing Curriculum, Instruction, and Student Achievement Goals; Striving for Comprehensive Achievement and Civic Readiness)
 Minn. Stat. § 120B.15 (Gifted and Talented Students Program)
 Minn. Stat. § 124E.03 (Applicable Law)
 Minn. Stat. § 124D.02 (School Board Powers; Enrollment)

Cross References: MSBA/MASA Model Policy 613 (Graduation Requirements)
 MSBA/MASA Model Policy 614 (Charter School Testing Plan and Procedure)
 MSBA/MASA Model Policy 615 (Testing Accommodations, Modifications, and Exemptions for IEPs, Section 504 Plans, and LEP Students)
 MSBA/MASA Model Policy 617 (Charter School Ensurance of Preparatory and High School Standards)
 MSBA/MASA Model Policy 618 (Assessment of Student Achievement)
 MSBA/MASA Model Policy 620 (Credit for Learning)



**St. Croix Preparatory Academy
Compensation Plan
May 19, 2026**

The following updates have been made to the Compensation Plan 2026-2027 to align with FY27 budget assumptions:

- Section I: Licensed Instructional Staff
 - The licensed teacher salary schedule (Appendix A), including the overload schedule, was increased by 1%.
 - To address compensation for employees at the top of the salary schedule (Step 19+), a new Step 20 has been added. Employees advancing to Step 20 will receive a 1.93% step increase in addition to the 1% schedule increase, for a total of 2.93%.
 - The compensation action plan for FY28 may further address longevity and top-of-scale compensation considerations
 - Step increase:
 - Step 19-1.93% step and 1% salary increase=2.93%
 - Step 20-1.93% step and 1% salary increase=2.93%
 - The average wage increase for licensed staff is 3.56%
 - Q-Comp leadership positions were updated to align with the program changes.
- Section II: Non-licensed Instructional Staff
 - The salary schedule (Appendix E) for EAs and paras was increased 1%.
 - The average wage increase for non-licensed instructional staff is 2.25%
- Section III: Non-Instructional Staff
 - Minimum and maximum pay ranges for each pay band were adjusted to align with budget assumptions.
 - The salary schedule (Appendix F) for food service staff was increased 1%.
 - The average wage increase for food service staff is 2.91%.
 - The average wage increase for non-instructional staff is 2.91%, and for administrative staff is 3.56%.
- Section V: Other Organizational Benefits
 - Updated to remove flexible hours language.
- Appendix B: Q-Comp Performance Incentive Schedule
 - Updated to align with the program changes.
- Appendix D: Staff Stipend Schedule and Hourly Rates
 - Curricular stipends were updated to remove stipends not applicable for FY27 and to align remaining stipends with Q-Comp program changes.
- Appendix G: Substitute and Season Employee Compensation Rates
 - Updated to align with budget assumptions.

Action Requested: Approve Compensation Plan for FY27.



st. croix preparatory academy

COMPENSATION PLAN

2026-2027

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INTRODUCTION

Goals of this Compensation Plan

- Provide a comprehensive and accessible compensation structure for all St. Croix Prep staff
- Ensure that our system of compensation is optimally aligned with our organization's values of collaboration, continuous improvement and development, and a belief that results matter
- Maintain a consistent and fair practice for establishing salaries across the school
- Stay competitive in the local market
- Ensure a compensation model for sustainable budgeting
- Guarantee compliance to FLSA requirements for exemption status

Components of this Compensation Plan

SCPA employees fall into one of the three employment categories. The unique compensation structure of each category is detailed in one of the following sections of this document:

- Licensed Instructional Staff Compensation (Teachers)
- Non-Licensed Instructional Staff Compensation (All Educational Assistants)
- Non-Instructional Staff (All other staff)

The fifth section of this document, Other Organizational Benefits, applies to all SCPA employees.

Finally, the Compensation Plan includes appendices which are appropriately referenced in the body of the Plan.

For FY28:

All schedules will be reevaluated and updated in 2026-27 for fiscal year 2028.

I. LICENSED INSTRUCTIONAL STAFF COMPENSATION

Components of Licensed Instructional Staff Compensation are as follows:

- A. **Placement Level:** Licensed instructional staff base salary is set forth in Appendix A (Licensed Instructional Staff Salary Schedule). Initial placement level is based on the candidate’s years of experience in accredited or similar standing schools in which he/she taught full time for the full academic year in any grade, K-12, or other relevant experience. Also considered in establishing a candidate’s placement level is external market conditions in which it is challenging to recruit and retain qualified teachers in a particular discipline. Placement level is determined after reviewing a candidate’s file prior to a hire date. Placement level may be negotiated with SCPA Administration approval.
- B. **Advancement of Placement Level:** For evaluation purposes, teachers are split into two categories: Level 1 and Level 2. Level 1 teachers are on year 1-3 teaching at SCPA; Level 2 teachers are on year 4 and beyond. Advancement of a placement level on the Licensed Instructional Staff Salary Schedule is detailed below for each level.
 - 1. Level 1 Teacher, advancement of a placement level on the Licensed Instructional Staff Salary Schedule is contingent upon the following:
 - a) Year End Performance Appraisal with Division Principal or Director: Must earn a minimum score of 76/114 on the annual year-end performance appraisal.
 - b) Completion of Annual Q-Comp Requirements: Current requirements are outlined in Appendix B.
 - c) SCPA Administration Recommendation: Administration recommendation for the teacher to move placement levels.
 - 2. Level 2 Teacher, advancement of a placement level on the Licensed Instructional Staff Salary Schedule is contingent upon the following:
 - a) Year End Performance Appraisal with Division Principal or Director on a 3-year rotation.
 - b) Participations in PLCs and Completion of Annual Q-Comp Requirements according to observation cycle: Current requirements are outlined in Appendix B.
 - c) SCPA Administration Recommendation: Administration recommendation for the teacher to move placement levels.
- C. **Salary Schedule:** Current year salaries are reflected in Appendix A.
- D. **Normal Teaching Load:** The normal teaching load of a full-time teacher varies by division and discipline. Teaching load is based on a 7-period day in middle school and upper school. 1.0 Full -Time Equivalent (FTE) teaching loads are defined as follows:

Grade	Description	Teaching Load per day
K-4	Gen. Ed Teacher	Approximately 5 hours of student contact time in a grade level classroom
K-4	Specialists - Art	5 Classes
K-4	Specialists - Music	5 Classes

K-4	Specialists - Physical Education	5 Classes plus 1 additional duty (20 min/day)
5-12	Gen. Ed Teacher	5 Classes
7-12	Gen. Ed. Teacher - Science	4 Science Lab Classes
5-12	Specialists - Art	5 Classes
5-12	Specialists - Music	6 Classes or Lesson Equivalent
5-12	Specialists - Physical Education	6 Classes
K-12	Special Education Teacher	Full Caseload as determined by SPED Director

The remaining unscheduled time in a teacher’s work day is for additional preparation, meetings, parental conferences, staff coverage if needed or other activities.

- E. **Teaching Overload:** Teaching duties in excess of load identified in paragraph D above shall be paid an overload stipend per the table below. The overloads are awarded at the discretion of the Division Principal and require prior approval by the Executive Director.

FTE weighting for Grades K-4 are as follows:

FTE weight	Non-Instructional Minutes	Stipend Amount
.10	70 minutes or less during the regular school day (9:30am-4:00pm)	\$ 3,625.00

FTE weighting for Grades 5-12 are as follows:

FTE weight	Credit Weight	Stipend Amount
.10	½ Credit Class	\$ 3,625.00
.20	1 Credit Class	\$ 7,249.00
.125	½ Credit Science Lab Class	\$ 4,531.00
.25	1 Credit Science Lab Class	\$ 9,061.00

- F. **Part-time Teaching Load:** If a teacher is part-time or temporary, the salary will be calculated according to their defined fractional FTE.
- G. **Additional Duties:** Assignments of teachers to Additional Duties such as, but not limited to, bus supervision, hall supervision, and event attendance, shall be distributed among all teachers in the building. No additional compensation is awarded for these duties. See Appendix C for a more complete list of Additional Duties.
- H. **Prep Time Substitute Pay:** Teachers who are requested by their building principal and agree to use planning or preparation time to substitute for a teacher who is absent shall be compensated for such duty at their hourly rate.

- I. **Coaching and Advisory Assignments:** All assignments to additional activities, including, but not limited to, athletic and extra-curricular activities and clubs, shall be compensated according to the schedule in Appendix D. The Activities Director and the appropriate coaching or advisor staff shall participate in the hiring process for these positions.
- J. **Q-Comp Leadership Positions:** Teacher leadership positions include the Q-Comp Coordinator, Professional Learning Community (PLC) Facilitator, Mentor Teacher, as well as short term project opportunities are available and shall be compensated according to the schedule in Appendix D.
 - 1. The Q-Comp Coordinator position is a five-year term and shall be posted in the spring preceding the term or upon vacancy if needed.
 - 2. The PLC Facilitator position is a one-year term, with up to a two-year renewal and shall be posted in the spring preceding the term or upon vacancy if needed.
 - 3. The Mentor Teacher position has a three-year term. Mentor teachers will be hired as needed.
 - 4. The Curriculum and Instruction Team participates in the hiring process for these positions.
- K. **Q-Comp Performance Incentives:** All teachers, school nurse, and counselors are eligible and are awarded additional pay, beyond the base salary, for participation in and qualification for Q-Comp Performance Incentives. Stipends for these duties are set forth in Appendix B (Q-Comp Performance Incentive Schedule).

II. NON-LICENSED INSTRUCTIONAL STAFF COMPENSATION

Components of Non-Licensed Instructional Staff Compensation are as follows:

A. Job Levels: SCPA has three job levels for non-licensed instructional staff:

- General Education, Education Assistants (Classroom EAs)
- Special Education, Paraprofessionals
- Special Education, Paraprofessionals – Special Duty

Education Assistants that work in the classroom supporting one grade level are General Education EAs. Education Assistants that work with special needs students either in the classroom or a resource room and may support multiple grade levels are Special Education Paraprofessionals.

B. Placement Level: Administration and the SCPA Board of Directors will determine all non-licensed instructional staff placement level based on job description, experience, and available external market data.

C. Advancement of Placement Level: Advancement of a placement level on the Non-Licensed Instructional Staff Salary Schedule is contingent upon achieving or exceeding the minimum score defined below on the year-end appraisal and SCPA Administration recommendation. The year-end appraisal will be performed by the employee's Division Principal or Director in collaboration with any supervising teacher.

- 1. Year End Performance Appraisal:** An average score of 2.0 or above on a 3-point scale on the annual year-end performance appraisal. The appraisal is performed by the teacher's Division Principal or Director in collaboration with any supervising teacher.
- 2. SCPA Administration Recommendation:** Administration recommendation for the staff member to move placement levels.

D. Salary Schedule: Current year salaries are reflected in Appendix E.

III. NON-INSTRUCTIONAL STAFF COMPENSATION

Components of Non-Instructional Staff Compensation are as follows:

- A. **Job Levels:** Five (5) Job Levels have been created for Non-Instructional Staff to ensure consistency in job functions across St. Croix Prep. A promotion is needed to move up one or more job levels.

Level 1: Entry Level Support (Food Service Servers)

- Job duties lean towards being more tactical in nature
- Directly supervised
- Limited autonomy to manage critical decisions
- Limited or no previous work experience required

Level 2: Advanced Level School Support (Food Service Leads, Health Room Assistant, Administrative Assistants, Study Hall Monitor, Building Attendant, Building Substitute)

- Responsible for leading, tracking and ensuring the achievement of the students with whom they work
- May lead some whole group and a significant amount of small group instruction
- Certifications may be required
- To enter this level, employee must possess a basic level of knowledge and mastery in his/her profession, but would benefit from additional years or work-related experience

Level 3: Office Managers, Farm to School Coordinator, Kitchen Manager

- Job duties have strategic requirements which require ample professional judgement and decision making over matters of significance
- Proven experience directly related to this profession is required to enter this level and professional certification may be required

Level 4: Managers, Coordinators, College Counselor, Technology Assistant, Facilities Assistant, Senior Accountant

- Job duties include responsibility for the strategic direction and success of a functional area of the organization
- Individual operates autonomously and makes critical decisions
- Individual may manage or coach others
- Proven experience and a track record of success is required to enter this level

Level 5: Directors, Principals, Executive Directors

- Establishes strategic direction for the organization in collaboration with Executive Leadership
- Individual has accountability for whole teams of people or entire functional areas of organization
- Proven experience operating at management levels of an organization are required to enter this level
- Two or more direct reports

- B. **Pay Level Bands:** Pay Level Bands correlate with Job Levels (see section A). Within each Band is a minimum and maximum pay level. Compensation for an individual is based on numerous factors such as market range for a position, job knowledge, skills, experience and demand. All salaries referenced are based on work by a full-time equivalent (FTE) employee. If a staff member is part-time or temporary, the salary will be calculated according to their defined fractional FTE.

Pay Level Band	Minimum	Maximum	Position
L1 (follows schedule on Appendix F after initial placement)	\$17.78	\$28.00	Food Service Servers
L2	\$18.00	\$30.00	Food Service Leads, Health Room Assistant, Administrative Assistants, Study Hall Monitor, Building Attendant, Building Substitute
L3	\$20.00	\$40.00	Office Managers, Farm to School Coordinator, Kitchen Manager
L4	\$50,000	\$95,000	Managers, Associate Director, Coordinators, College Counselor, Technology Assistant, Senior Accountant, Facilities Assistant
L5	\$75,000	\$199,000	Directors, Principals, Executive Directors* (*contracted rates may differ)

- C. **Starting Salary:** Administration and the SCPA Board of Directors will determine all non-instructional staff starting salary based on expectations/job description, experience, value to the school and available external market data. The Pay Level Bands (see paragraph B) will be reflective of this determination.
- D. **Tiers for Raises:** Performance-based raises will be offered according to the following set of criteria, with manager discretion within the provided ranges.

Performance-Based Raise Tiers	Professional Evaluation (on 5-point scale)	Potential Raise Range*
Tier 1	At least 3.0	.5 - 1.0%
Tier 2	3.25 to 3.75	1.5 - 2%
Tier 3	More than 3.75	2 - 3%

*Salary increases outside of this range may be granted with SCPA Administration approval.

- E. **Performance Evaluation Components:** The performance evaluation score is determined by the direct manager and may be influenced by the following inputs:
1. 360 Evaluation
 2. Progress on Individual Performance Goals
 - Individual Performance Goals (IPG) are job-specific performance goals that may be set annually between you and your manager. IPGs should to be Specific, Measurable, Attainable, Relevant, and Time bound, and should be aligned with other organizational goals.

IV. SUBSTITUTE AND SEASONAL EMPLOYEE COMPENSATION

Components of Substitute and Seasonal Employee Compensation are reflected in Appendix G.

V. OTHER ORGANIZATIONAL BENEFITS

Other employment benefits for all eligible employees (employees regularly scheduled to work 30 or more hours per week), the total compensation package includes significantly more than base salary (or hourly wages).

Notably, St. Croix Prep offers and contributes substantial monetary amounts toward benefit programs intended to help protect your personal and financial well-being. Those contributions usually equate to a value of approximately 23% of your annual salary.

See our benefits summary documents for more information. Our benefit offerings currently include: health, dental, long-term disability, life insurance, 403(b), flexible spending account, paid time-off, and matching contributions for PERA and TRA retirement accounts as applicable.

Other Organizational Benefits that contribute to SCPA's positive, supportive culture:

- Flexible work environment:
 - Coverage for staff in emergencies
 - Jeans and spirit-wear on Thursdays and college-wear on Fridays
- Support with Professional Development:
 - Earn CEUs through on-site professional development
 - CEU hours entered on MDE portal on behalf of licensed faculty
- Support of enrollment of staff child(ren) at SCPA:
 - Preferential student enrollment for SCPA employees
 - Free on-site childcare before and after school through YMCA for licensed staff's child(ren)
- Support during work day:
 - On-site food service: Lunch, including Salad Bar & Breakfast items
 - Free coffee (locally roasted)/tea and condiments
 - Notary public on-site (Senior Accountant)
- Discounts extended to staff:
 - SCRIP discounts (staff may elect full rebate amount for discount)
 - Staff free entry with staff ID at SCPA hosted events
- Support of staff and family health and wellness:
 - Free use of fitness room and athletic facilities
 - Health club fee reimbursement through SCPA's health insurance carrier
 - Wellness program - \$120 per year upon completion of earning required participation points
- St. Croix Prep strives to be a good local and global citizen:
 - Recycle/compost options for paper, glass, aluminum and food
 - SCPA is a prairie restoration site
 - Stillwater Chamber of Commerce member
 - SCPA's National Honor Society has adopted a section of Stagecoach Trail

APPENDIX A:

Licensed Instructional Staff Salary Schedule

2026-2027 School Year

Placement Level*	FY26 Pay Scale 1.0 FTE
1	\$44,872
2	\$45,470
3	\$46,379
4	\$47,306
5	\$48,963
6	\$49,942
7	\$50,941
8	\$51,959
9	\$54,558
10	\$55,650
11	\$56,762
12	\$57,898
13	\$59,055
14	\$60,237
15	\$61,441
16	\$62,670
17	\$63,924
18	\$65,202
19+	\$66,505
20	\$67,835

*Advancement on the placement schedule is contingent upon completing QComp requirements, achieving or exceeding the required minimum score on the year-end appraisal, and SCPA Administration recommendation.

An annual increase for staff above placement level 20 is 2.96% for FY27 and is contingent upon completing QComp requirements, achieving or exceeding the required minimum score on the year-end appraisal, and SCPA Administration recommendation.

All schedules will be reevaluated and updated in 2026-27 for fiscal year 2028.

APPENDIX B:

Q-Comp Performance Incentive Schedule

2026-2027 School Year

Licensed staff (teachers, school nurse, and counselors) are awarded additional pay, beyond base salary, for participation in and qualification for Q- Comp Performance Incentives. The goal of the incentive is to improve teacher instruction and increase student performance. The amount for each category is based on the dollars available each year as determined by the submitted and approved Q-Comp Plan by the Minnesota Department of Education. For the 2026-2027 school year, to receive performance based pay all licensed staff will need to complete the following:

- **Site Goal:** \$1 for schoolwide student achievement gains will be awarded to each teacher if the schoolwide site goal (updated annually) is met.
 - Satisfactorily meeting School-Wide Student Achievement Goals: TBD in the Fall
- **Measure of Student Growth and Literacy:** \$630 for measure of student growth and literacy will be awarded to each teacher if progress was made toward their individual annual student learning goal.
- **Teacher Observation/Evaluation:** \$685 for teacher evaluation will be awarded to each teacher who completes all observation requirements required for their category level by the final PLC meeting.
- **Additional Measure of Performance: PLC Attendance and Participation:** \$484 for PLC meeting attendance and participation will be awarded to each teacher who attends PLC meetings with timely attendance (two absences allowed) and completes the Individual Growth and Development Plan, Colleague Connections, and engagement survey requirements.
- **Total Pay= \$1,800**

APPENDIX C:

Additional Duties

2026-2027 School Year

Additional Duty	Licensed School Nurse			Lower School			Middle School			Upper School		
	Time	Frequency	Requirements	Time	Frequency	Requirements	Time	Frequency	Requirements	Time	Frequency	Requirements
Supervisory:												
Parent drop off				15-20 minutes	Daily	Some 1 LS staff	20 minutes	Daily	As Assigned	20 minutes	Daily	As Assigned
Parent pickup/bus				15-20 minutes	Daily	All of LS staff	20 minutes	Daily	As Assigned	20 minutes	Daily	As Assigned
Direct Traffic				25 minutes	Daily	As Assigned				25 minutes	Daily	As Assigned
Lunch Duty				25 minutes	As Needed	As Needed (no EA)	20 minutes	Daily	As Assigned	25 minutes	2x/week	As Assigned
Recess				20 minutes	As Needed	As Needed (no EA)	20 minutes	Daily	As Assigned			
Hall/Atrium/Stairwell Duty				20 minutes	Daily	All LS Staff	20 minutes	Daily	As Assigned	25 minutes	Daily	All US Staff
Class passing time							20 minutes	Daily	MS Staff	20 minutes	Daily	All US Staff
Latin Lab OR Writing Lab OR Study Hall (before school)							25 minutes	Daily	As Assigned			
Math Lab OR Study Hall (during recess)							20 minutes	Daily	As Assigned			
Detention										75 minutes	1x/week	As Assigned
Advisory (Service Hrs/EOY Presentations)										25 minutes	Daily	As Assigned
TA Coordinator										45 minutes	Daily	As Assigned
Upper School Faculty Committees										20 minutes	1x/biweekly	As Assigned
Middle School Faculty Committees							1-2 hours	As Needed	As Assigned			
Lower School Faculty Committees				3-4 hours	monthly	As Assigned						
Communication:												
Conferences				30 hours	2x/year	All LS staff	8-10 hours	1x/year	All MS Staff	8 hours	1x/year	All US Staff
Additional parent conferences				As Needed	As Needed	All LS staff	As Needed	As Needed	All MS Staff	As Needed	As Needed	All US Staff
Newsletter				1 hour	Weekly	All LS staff	1 hour	As Needed	As Submitted	1 hour	As Needed	As Submitted
Student Office Hours				1 hour	1x/month	As Needed	Before/After school + lunch	Daily	As Needed	Before/After school + lunch	As Needed	All US Staff
Child Study/SPED Meetings				Before/After School or Prep Hours	As Needed	As Assigned	Before/After School or Prep Hours	As Needed	As Assigned	Before/After School	As Needed	As Assigned
Events/Activities:												
Concerts				3 hours	1x/year	All LS staff	2 hours	3x/year	All Music Staff	2 hours	3x/year	All Music Staff
Art Shows				20 hours	1x/year	Art Staff	20 hours	2x/year	Art Staff	10 hours	2x/year	Art & Music Staff
Back to school night	3 hours	1-2x/year	all schools	3 hours	1x/year	All LS staff	3 hours	1x/year	All MS Staff	3 hours	2x/year	All US Staff
Parent Information Night				3-4 hours	1x/year	All LS staff						
Kindergarten Open House	3-4 hours	1x/year		3-4 hours	1x/year	All LS staff						
Fifth Grade Orientation							5 hours	1x/year	5th Grade Staff			
Ninth Grade Orientation										3-4 hours	3x/year	9th Grade Staff
Registration Night										4 hours	1x/year	All US Staff
Student of the Month				1 hour	1X month	Grade Level Teams	3-4 hours	1x month	As Assigned	See Faculty Committees		
Chaperoning (Dances/PROM/Other)										4 hours	3x/year	US Staff/Volunteers
Graduation & Senior Dinner										6-8 hours	2 nights/year	All US Staff
Senior Retreat Overnight Chaperones										3 days	2x/year	6 US Staff
EOY Awards Ceremony				1-1/2 hours	1x/year	All LS staff				6 hours	1x/year	All US Staff
Activity Advisors				2-4 hours	As Needed	LS staff volunteers	2-4 hours	As Needed	MS Staff Volunteers	2-3 hours	2x/month	Half of US Staff
Field Trip Chaperones- Extended Day							4-5 hours	1x year	As Assigned			
Educ. Travel Chaperone-DC/Wolf Ridge/Lang. Camp							3-4 days	1x year	MS Staff Volunteers			
Independent Study Advisors										15-30 min/day	Daily	Requested Staff
Other Information:												
Prep minutes				96 minutes	Daily	All LS staff	96 minutes	Daily	All MS Staff	96 minutes	Daily	All US Staff
Student/Staff Ratios				1 Teacher + 1 EA:30-32 Specialists: 1:30-32	Year Round	All LS staff	1:30-36 average Music 1:40+	Year Round	All MS Staff	Math/Eng 1:36 PE/Soc St 1:36 Sci 1:30 Art 1:25 Music 1:40+	Year Round	All US Staff
EA/Specialist Support				Varries Depending on Grade	Daily	Each classroom / SPED Eas		Daily	SPED EAs - No Classroom EAs		Daily	SPED EAs - No Classroom EAs

APPENDIX D:

Staff Stipend Schedule and Hourly Rates

2026-27 School Year

ACTIVITIES		
	By Advisor	By Activity
Upper School Student Council		2,585
Advisor Stipend	2,585	
Middle School Student Council		2,585
Advisor Stipend	2,585	
Pep Band		330
Advisor Stipend/ \$55 per game	330	
Jazz Band II		1,100
Advisor Stipend	1,100	
National Honor Society		2,585
Advisor Stipend	2,585	
Service Club		2,585
Advisor Stipend	2,585	
Upper School Theater		7,975
Director	3,300	
Vocal Director	1,100	
Technical Director	550	
Pit Director	825	
Choreographer	1,100	
Piano	1,100	
Middle School Theater		4,750
Director	3,100	
Asst. Director	1,100	
Asst. Director/Tech	550	
Lower School Theatre		6,800
Co-Director/Producer	3,500	
Assistant/Helper	1,100	
Choreographer	1,100	
Tech. Director	550	
Stage Manager	550	
Debate		3,300
Advisor Stipend	3,300	
Speech		3,300
Advisor Stipend	3,300	
Mock Trial		1,800
Advisor Stipend	1,800	
LS Choir		1,100
Advisor Stipend	1,100	
Battle of the Books		880
Advisor Stipend	880	
Continental Math League		1,265
Advisor Stipend	633	
Advisor Stipend	633	
Math League - US		1,760
Advisor Stipend	1,760	
Ski Club		1,100
Advisor Stipend	1,100	
Quiz Bowl		550
Advisor Stipend	550	
Yearbook		4,400
LS Advisor Stipend	2,200	
MS Advisor Stipend	2,200	
TOTAL		50,750

ATHLETICS		
	By Coach	By Sport
Girls Tennis		3,685
Head Varsity Coach	3,685	
Asst. Varsity Coach		
Volleyball		10,945
Head Varsity Coach	3,685	
Asst. Varsity Coach/JV	2,750	
C-Team Coach	2,750	
Middle School Coach	1,760	
Cross Country		5,995
Head Varsity Coach	3,410	
Asst. Varsity Coach/JV	2,585	
Girls Soccer		8,580
Head Varsity Coach	3,410	
Asst. Varsity Coach/JV	2,585	
C Team Coach	2,585	
Boys Soccer		8,580
Head Varsity Coach	3,410	
Asst. Varsity Coach	2,585	
C Team Coach	2,585	
Boys Basketball		12,760
Head Varsity Coach	5,060	
Asst. Varsity Coach/JV	3,850	
C-Squad Head Coach	3,850	
Girls Basketball		12,760
Head Varsity Coach	5,060	
Asst. Varsity Coach/JV	3,850	
C-Squad Head Coach	3,850	
Alpine Ski		5,060
Head Varsity Coach	3,685	
Asst. Varsity Coach	1,375	
Dance Team		3,300
Head Varsity Coach	3,300	
Asst. Varsity Coach		
Archery		11,990
Head Varsity Coach	4,070	
Asst. Varsity Coach	1,980	
Asst. Varsity Coach	1,980	
Asst. Varsity Coach	1,980	
Asst. Varsity Coach	1,980	
Baseball		5,885
Head Varsity Coach	3,685	
Asst. Varsity Coach	2,200	
Softball		5,885
Head Varsity Coach	3,685	
Asst. Varsity Coach	2,200	
Girls Lacrosse		5,390
Head Varsity Coach	3,190	
Asst. Varsity Coach	2,200	
Golf		9,570
Boys Head Varsity Coach	3,685	
Girls Head Varsity Coach	3,685	
Asst. Varsity Coach	2,200	

ATHLETICS (CON'T)		
	By Coach	By Sport
Track		14,685
Head Varsity Coach	3,685	
Asst. Varsity Coach	2,200	
Asst. Varsity Coach	2,200	
Asst. Varsity Coach	2,200	
Asst. Varsity Coach	2,200	
Asst. Varsity Coach	2,200	
TOTAL ATHLETICS		125,070
CURRICULAR		
	By Advisor	
Peer Tutoring		2,200
US Grade Level Advisory Lead		1,650
College Recommendation Letters (10)		275
Pre-AP Chemistry Online		2,200
Curriculum Development/ per day		175
Daily Stipend for approved additional projects/duties/ full day (6-8 hours)		175
Daily Stipend for approved additional projects/duties/ half day (3-5 hours)		87.50
Board Member		850
Board Clerk (per meeting)		120
PLC Facilitator		1,000
Mentor Teacher Year 1		2,000
Mentor Teacher Year 2		1,000
Mentor Teacher Year 3		500
Test Proctoring		18.00/hr
Summer School		60.00/hr
ESY		60.00/hr
Homework Club		35.00/hr
Homebound teaching		35.00/hr
Subbing for another teacher (internal coverage)		hourly rate per annual
TOTAL CURRICULAR STIPENDS		
NON- CURRICULAR		
	By Advisor	
Traffic Duty		20/shift
Concessions		1,000
Before/after school atrium duty		18.53/hr
TOTAL NON-CURRICULAR STIPENDS		

**APPENDIX E:
Non-Licensed Instructional Staff Salary Schedule**

2025-2026 School Year

General Education - Educational Assistant	
Placement Level*	Hourly Rate
1	\$17.78
2	\$18.03
3	\$18.28
4	\$18.53
5	\$18.79
6	\$19.04
7	\$19.29
8	\$19.54
9	\$19.80
10	\$20.05

Special Education -Paraprofessional	
Placement Level*	Hourly Rate
1	\$19.04
2	\$19.29
3	\$19.54
4	\$19.80
5	\$20.05
6	\$20.30
7	\$20.55
8	\$20.81
9	\$21.06
10	\$21.31

Special Education - Paraprofessional - Special Duty	
Placement Level*	Hourly Rate
1	\$21.56
2	\$21.82
3	\$22.07
4	\$22.32
5	\$22.57
6	\$22.83
7	\$23.08
8	\$23.33
9	\$23.58
10	\$23.84

Advancement on the placement schedule is contingent upon achieving or exceeding the required minimum score on the year-end appraisal and SCPA Administration recommendation.

An annual increase for staff above placement level 10 is 2.25% for FY27 and is contingent upon achieving or exceeding the required minimum score on the year-end appraisal and SCPA Administration recommendation.

All schedules will be reevaluated and updated in 2026-27 for fiscal year 2028.

**APPENDIX F:
Non-Instructional Food Service Staff Salary Schedule**

2026-2027 School Year

Food Service		
Placement Level*	Hourly Rate *4 hours or less/day	Hourly Rate *5 hours or more/day
1	\$17.78	\$19.04
2	\$18.03	\$19.29
3	\$18.28	\$19.54
4	\$18.53	\$19.80
5	\$18.79	\$20.05
6	\$19.04	\$20.30
7	\$19.29	\$20.55
8	\$19.54	\$20.81
9	\$19.80	\$21.06
10	\$20.05	\$21.31

Advancement on the placement schedule is contingent upon achieving or exceeding the required minimum score on the year-end appraisal and SCPA Administration recommendation.

An annual increase for staff above placement level 10 is 2.91% for FY27 and is contingent upon achieving or exceeding the required minimum score on the year-end appraisal and SCPA Administration recommendation.

All schedules will be reevaluated and updated in 2026-27 for fiscal year 2028.

APPENDIX G:

Substitute and Seasonal Employee Compensation Rates

2026-2027 School Year

Teacher Subs	\$175/day or \$87.50/half day
Long-Term Teacher Subs	\$225/day
Building Substitute	\$29.00-\$29.50/hour
EA General Education Subs	\$17.78/hour
EA Special Education Subs	\$17.78/hour
Nurse Subs	\$46.00/hour
Health Office Assistant Subs	\$17.88/hour
Office Manager Subs	\$17.88/hour
Food Service Subs	\$17.78/hour
Seasonal Test Proctor	\$18.00/hour
Seasonal Student Workers	\$18.25/hour
Seasonal Administrative Workers	\$18.25/hour

Milk Decision Matrix

Funding Year: FY2627

Please grade each category with a score of 0 through 5
(0 being the lowest and 5 being the highest)

Vendor 1
Name: Kemps
Contact information: Bryan Pink Brvan.Pink@Kemps.com
Date Received: 3/24/26
Total Cost: 1212.59 weekly

Vendor 2
Name: Prairie Farms
Contact information: Ron McNamara Ron_McNamara@prairiefarms.com
Date Received: 3/12/26
Total Cost: 1140.39 weekly

Vendor 3
Name: SPBS
Contact information: Bob Lagermeier 3/24/26
Date Received: No bid - competing company riagermeier@spbevso.com
Total Cost:

Selection Criteria	Available
Pricing	40%
Product Quality	30%
Delivery Schedule	30%
Overall Vendor Ranking	100%

Weighted Score

Score (1 through 5)
2
5
5

Score (1 through 5)
5
5
4

Score (1 through 5)

NOTES:

Weekly \$72.20 higher than PF

1% chocolate, not skim chocolate, will do their best to accommodate the delivery time window

Declined to bid, work for the same parent company as Kemps

Vendor Selected: Prairie Farms
Approved By:
Title:
Date:

Bid Assessment Comments, if needed:

PF	weekly usage average	K
212.55	650	246.35
852	2400	909.6
75.84	96	56.64
1140.39		1212.59

72.20 difference in favor of PF

cost per unit	
0.379	1%
0.379	Ch
0.59	LF
	SK
1.348	

\$57.60 difference per week for chocolate- favors Prairie Farms
\$33.80 difference per week for 1% - favors Prairie Farms
\$19.20 difference for LF - per week favors Kemps

72.20 x 36 weeks =

\$2559.20 savings per year if went with Prairie Farms

Bread Decision Matrix
Funding Year: FY2627

Please grade each category with a score of 0 through 5 (0 being the lowest and 5 being the highest)

Selection Criteria	Available
Pricing	40%
Product Quality	30%
Delivery Schedule	30%
Overall Vendor Ranking	100%

NOTES:

Vendor 1
Name: Bimbo
Contact information: Rosalie Szabo emailed
Date Received: 3/30/26
Total Cost:

Vendor 2
Name: Pan O Gold
Contact information: Blake Alton Phillips
Date Received: 3/5/26
Total Cost:

Vendor 3
Name: Denny's Bakery
Tracy Nelson info@dennysbakery.com
Total Cost:

Score (1 through 5)
4
4
3
11

Score (1 through 5)
5
4
4
13

Score (1 through 5)
No response received

Vendor Selected: Pan O Gold
Approved By:
Title:
Date:

Bid Assessment Comments, if needed:

	Pan O Gold	Bimbo	Denny's Bakery
WG hot dog buns 12 ct	\$2.80	2.76/12 pk	3.68/16 pk
WG sandwich bread	\$2.52	2.59	
WG hamburger buns 60 ct	10.49	13.88/ 60 ct	6.94/30 ct
WG hoagie 24 ct	5.59	3.66/24 ct	1.83/12 pk
WG dinner roll pull apart 60 ct	10.24	9.15 60 ct	1.83/12 pk
	\$31.64	32.04	
average weekly usage			
hamburger buns 28	146.86		194.32
hot dog buns 40	112		110.4
dinner rolls 30	51.2		45.75
	310.06		350.47
		-40.41	
36 weeks x (40.41)	1454.76 yearly savings with POG		

Prime Vendor 26/27 Rubric

Criteria	Maximum Score	UL
Price (FF 20: Market Basket 30)	50	48
Completeness of product line / volume of special orders	10	10
Distributor experience & qualifications / Past performance with School/		
Distributor references/reputation	10	10
Computer capabilities, including operational reports, nutritional analysis, and uploading of purchase data to MN Dept of	30	30
Customer Service & Regulatory support	20	20
NOI & FFS Capabilities	10	10
Foodservice Consultant Trained in School requirements	20	20
Operational plan & procedures	20	20
Ability to meet service characteristics described by School	20	20
Degree of ancillary services that impact School needs	10	10
		198
fixed rate fee		2.05
commodity fee		4.25
total market basket cost		146,510.65

Sysco additional commodity fee of \$1/cs for storage over 60 days	Carry Ranchers Legacy? Sysco No response
IFD additional commodity fee of \$1.75/cs for storage over 60 days	IFD and UL carry these
UL additional commodity fee 0.95 per case for storage over 60 days	

Award to Upper Lakes

Sysco	IFD	comments
48	50	best marketbasket prices IFD
9	8	no subs for UL
		No issues with UL for past 5 years
		Ask about
		Sysco no CPC
		east discount? WBL is
		metro NO happy
8	9	schools? response with IFD
30	30	All comparable
20	20	all comparable
10	10	all comparable
20	20	all comparable
20	20	all comparable
20	20	all comparable
10	10	all comparable
195	197	
1.99	1.75	
2.05	3.75	
146,530.25	145,479.32	

Communications and Events Manager Bi- Annual Board Report

General Information

Manager Name: Susan Peterson

Date: May 2026

Section 1: SWOT Analysis

Category	Details (examples included)
Strengths	<p>Effective Internal Communication: Continue to receive feedback that the weekly staff update is helpful. The addition of quick links to commonly used forms and processes has further improved staff access to important information and resources.</p> <p>Strong Community Engagement: School events are consistently well attended and positively received by families, reflecting strong community support and satisfaction with school programs, activities, and events.</p> <p>High Parent Engagement with Communications: Weekly parent emails maintain a strong 78–80% open rate, indicating that families are actively engaged, informed, and connected to school news and updates.</p> <p>Strategic Communication Planning: The communications tracking plan has been an effective tool for organizing and scheduling school messaging in a thoughtful way to minimize email fatigue while keeping families informed. While unexpected communications occasionally arise, efforts are consistently made to balance frequency.</p> <p>Marathon Fundraising Messaging: The school community has expressed appreciation for the increased transparency around Marathon fundraising, particularly in understanding how funds are allocated and directly support the school and student experience.</p>
Weaknesses	<p>Limited Insight into Staff Engagement with the Prep Weekly Communications: While the Prep Weekly serves as a key communication tool, there is currently no reliable way to measure how consistently staff are reading or engaging with the content. Implementing a separate tracking method that measures email sends, opens, and clicks could provide more meaningful data and help improve staff communication effectiveness.</p>

Opportunities	<p>Continue to Leverage Digital and Social Media: Implement a strategic and consistent approach to digital and social media communications to further highlight student achievements, school and community events. Recent audience growth demonstrates positive momentum, including a 14% increase in Instagram followers, a 5% increase on Facebook, and modest growth on X (data point from Dec 2025).</p> <p>Deepen Collaboration with the St. Croix Prep Foundation: Continue strengthening collaboration with the Foundation to support shared initiatives, enhance communication efforts, and further align messaging and community outreach goals.</p> <p>Enhance Staff Engagement and Morale: Create additional opportunities for staff connection, recognition, and team-building to support a positive, collaborative workplace culture. This is especially important as the school year concludes and staff fatigue increases, making intentional morale-building efforts particularly valuable.</p>
Threats	<p>Volunteer Burnout/Parent Involvement: The school has experienced some turnover among parent volunteers leading key Parent Group initiatives, including leadership roles, the book fair, and the Lower School dance event. Sustaining long-term volunteer engagement and leadership continuity remains an ongoing challenge. However, the commitment of two parents to serve as co-leaders of Parent Group for next year is a positive and encouraging development.</p> <p>Maintaining Strong Parent Engagement: Continued parent engagement is essential to supporting the mission and activities of St. Croix Prep. Ensuring communication remains timely, clear, and effective will be critical to maintaining strong family involvement and partnership within the school community.</p>

Section 2: Parent Group Engagement

Prompt	Response
How have you engaged the parent group to support communications, events, and school initiatives so far?	<p>I attend the monthly Parent Group meetings and in daily/weekly communication with Parent Group co-leads/event coordinators re ideas for communicating their various events and initiatives and support their efforts in these events, follow up on facilities needs, other on site details as needed, and assist at the events when possible:</p> <ul style="list-style-type: none"> - LS Carnival - Used Uniform Sale - Lower School Dance Party Event - Book Fair (winter/spring) - Book Bingo/Pizza Night - MS Bowling - Staff Appreciation Week

	<ul style="list-style-type: none"> - 8th Grade Moving Up Party - 4th Grade Level Up Movie Day
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Section 3: Community Engagement

Prompt	Response
<p>What community partnerships, outreach efforts, or collaborations have been established or strengthened so far?</p>	<p>We have strengthened relationships with event sponsors and parent donors by fostering open, responsive, and professional communication so they feel comfortable reaching out with questions or needs.</p> <p>Through Parent Group initiatives and other school events, we have continued building strong partnerships with local businesses and community vendors that support our school through discounted pricing, give-back programs, and donations. These partnerships include businesses such as Kona Ice, Son’s Deli, Mike and Kat’s Other Place, Sara’s Bakery, Lucky Duck Bread, Shutter Valley Photo Booth, Joe on the Go, Sticks, Acapulco, Color Me Impressed, Autism Services of Minnesota, Woodbury 10 Theatre, Kwik Trip, and Game World.</p> <p>To continue building transparency and donor engagement, a year-end communication will be sent to Marathon donors summarizing how their contributions were used throughout the school year. In addition to the weekly highlights featured in Prep Weekly, this comprehensive update will showcase the direct impact of donor support on our students and school community.</p>

Section 4: Event Updates

Event	Details/Notes
Key Events Since Dec 2025	<p>LS Carnival - Jan 2026</p> <p>Ignite Prep - April 2026</p> <p>LS Dance Event - April 2026</p> <p>Marathon Reward Field Day - May 2026</p>
Attendance & Outcomes	Ignite Prep

	<p>Ignite Prep achieved its highest attendance to date and received overwhelmingly positive feedback from attendees. My primary involvement included managing communications and social media efforts for the Foundation. The school also oversaw the Fund-a-Need component, including creating the promotional video, developing the donor appeal, and securing pre-commitments. In addition, I supported the Ignite Prep coordinators by providing guidance on the auction software platform, assisting with the seating chart, and advising on event flow and check-in/check-out procedures.</p> <p>LS Carnival/Lower School Dance Event Attendance was comparable to last year, and many families shared positive feedback about the events. Parents appreciated the opportunity for students and families to connect and strengthen relationships within the school community in a fun and welcoming environment.</p> <p>5th/9th Grade Marathon Reward Field Day This reward event recognized the Middle School and Upper School grades that raised the most Marathon funds in their divisions. In collaboration with Middle School and Upper School teachers and staff, we organized an afternoon of activities and celebration for 5th and 9th grade students. Feedback from students and staff was very positive, particularly regarding the opportunity for students to enjoy time outside of their normal schedule. The Kona Ice truck was especially well received. Highlights from the afternoon will also be featured in an upcoming social media post.</p>
Upcoming Events	<p>Final Parent Group Events: 8th Grade Party (May 8), 4th Grade Level Up Movie Day (May 16)</p> <p>Senior Events: Lunch, Party, Pre-Commencement Reception</p>

Section 5: Additional Notes & Support Requested

Notes:

Support requested from the School Board:



Q Comp Program Update Form for 2026-2027

Due: August 31, 2026

General Information: This form is to be used by all implementing districts and charter schools to provide information to the Minnesota Department of Education (MDE) regarding changes to the approved Quality Compensation (Q Comp) program as outlined in [Minnesota Statutes, section 122A.414](#). The form will expand to fit the responses. For each core component, begin by putting an "X" next to either Yes or No to signify that there are changes, or no changes, to that component. Then, complete that section, if applicable, or move to the next component. Send the completed document and any related attachments via email to mde.q-comp@state.mn.us.

Note: There is no need to submit a program update form if no changes are being made to the approved

Q Comp program.

District or Charter School Name: St. Croix Preparatory Academy

Superintendent or Director: Jenn Fuchs

- Phone: 651-395-5905
- Email: jennfuchs@stcroixprep.org

President of the Exclusive Representative of the Teachers: Enter text here

- Phone: Enter text here
- Email: Enter text here

Program Contact Person: Nicole Donnay

- Phone: 651-964-6046
- Email: nicoledonnay@stcroixprep.org

It is the district's responsibility to align any program changes with statutory requirements. To assist with this process, read the [Q Comp Requirements and Guiding Principles document](#) on the Teacher Development and Evaluation (TDE) and Q Comp web page, under the Implementation section.

Please address all items related to the component(s) that are being changed and attach any additional information and related materials. Ensure that when designing program changes the fiscal implications of the change are thoroughly considered so that funds are available to cover related costs and that for school districts both the school board/administration and exclusive representative of the teachers understands and agrees to all changes. MDE staff will review the provided information and contact the district/charter school if further clarification is needed.

Core Component: Career Advancement Options

Are changes being made to this component? Yes No

If yes, please complete the following sections as applicable.

Discontinuing—Identify any position(s) being removed: Teaching and Learning Coordinators

Expanding—Provide the full job descriptions, below, for any position(s) being added:

Title: **Q Comp Coordinator**

Qualifications:

- Valid MN Teaching License

Responsibilities:

- Coordinate with Curriculum and Instruction team, Admin Team, and Staff Development/Re-licensure Committee to plan, implement, and evaluate Q Comp initiatives
- Participate as a member of the Q Comp Committee and report progress on Q Comp initiative implementation
- Co-plan professional development, ensuring an integrated focus on classical education and the incorporation of Q Comp into the overall professional development plan, including budgetary and schedule considerations
- Collaborate with PLC leaders to ensure alignment of the PLC and peer observation process with the District's professional development program
- Co-Plan and co-lead new teacher orientation
- Work with the Curriculum and Instruction team to develop and implement teacher growth and development plans
- Create and maintain necessary documentation for teacher growth and development
- QComp reporting compliance with MDE

Hiring Process:

- Posted position
- Screened applicants
- Two rounds of interviews
 - o Phone interview
 - o In-person interview with a panel that had representation from each division

Length of Term:

- 5 year term

Evaluation:

- Mid-year and end-of-year evaluation

Compensation: \$85,000-95,000

Title: **Mentor Teacher**

Qualifications:

- Current MN teaching license
- 4+ years of successful teaching experience

- Previous successful experience in leadership roles preferred
- Demonstrated ability to build relationships with new employees and colleagues
- Demonstrated commitment to furthering the classical framework at SCPA

Responsibilities:

- Welcome new teachers in transitioning to a new school during New Staff Orientation and Back to School Week
- Answer questions or direct employees to other resources
- Assist new teachers in finding solutions to questions about curriculum and instructional best practices, such as classroom management, lesson planning, and student assessment
- Assist new teachers in planning effective seminars
- Meet with mentees weekly or bi-weekly
- Attend required mentor meetings and professional development
- Provide feedback as requested to the Q Comp Coordinator
- Collaborate with the Q Comp Coordinator

Length of Term:

- 3 year term

Hiring Process:

- Posted position
- Screened applicants
- In-person interview
- Create a pool of mentors to draw from as needed

Evaluation:

- Mid-year and end-of-year evaluation

Compensation:

- Year 1: \$2,000 Stipend
- Year 2: \$1,000 Stipend
- Year 3: \$500 Stipend

Revising—Using the categories above, describe any changes to an existing position description(s):

Title: **PLC Facilitator** - 16 positions available

Qualifications:

- Current MN teaching license
- 4+ years of teaching experience
- Demonstrated commitment to continued professional development
- Demonstrated commitment to furthering the classical framework at SCPA
- Demonstrated effective leadership skills, communication, and support to staff
- Willingness to participate in summer Q-Comp-related training opportunities
- Ability to use data and technology to analyze and track student performance

Responsibilities:

- Facilitate bi-weekly PLC meetings
- Assist in reviewing and evaluating the Q-Comp program as needed
- Attend monthly PLC Facilitator meetings with the Q Comp Coordinator and administration
- Coordinate with Q Comp Coordinator to facilitate effective data-driven PLC teamwork, focused on Student Learning Goals
- Continue professional growth through readings and training on Q-Comp initiatives
- Compile PLC meeting agendas, minutes, and collaboration records

Length of Term:

- The term will be 1 year, with up to a 2-year renewal.

Hiring Process:

- Post positions
- Screen applicants
- If one applicant per PLC: In-person interview
- If more than one applicant per PLC: two rounds of interviews
 - o Phone interview
 - o In-person interview

Evaluation:

- Mid-year and end-of-year evaluation

Compensation: \$1,000

Core Component: Job-Embedded Professional Development

Are changes being made to this component? Yes No

If yes, please complete the following sections as applicable.

PLC Meetings

Frequency—Describe how often teams meet: Twice a month

Length—Describe how long each team meeting is: 45 minutes

Composition—Describe the new team (e.g., grade levels, banded grades, departments):

PLC 1: K-2nd Grade

PLC 2: 3rd - 4th Grade

PLC 3: LS SpEd

PLC 4: MS Humanities

PLC 5: MS SpEd

PLC 6: MS Math/Science

PLC 7: Music

PLC 8: Art

PLC 9: US Science

PLC 10: US Math

PLC 11: US Social Studies

PLC 12: US English

PLC 13: US Language

PLC 14: US SpEd

PLC 15: Health/PE
 PLC 16: Student Support

Peer to Peer Observations—“Colleague Connections”

Frequency—Describe how often: twice per year

Components—listed below:

- Teachers will engage in peer-to-peer classroom observations to support professional growth, promote reflective practice, strengthen collaboration among staff, and support continuous improvement in teaching and learning.
- Teachers will complete two peer observations per school year. Observation 1 will be completed before winter break, and observation 2 will be completed before the final PLC meeting.
- Observations may take place within grade levels, content areas, or across departments to encourage diverse learning opportunities.
- Following each observation, teachers will complete a reflection form documenting what they observed, key takeaways, and how the experience may impact their own instructional practices.

Core Component: Teacher Evaluation

Are changes being made to this component? Yes No

If yes, please complete the following sections as applicable.

Peer Review—Describe the revised Peer Review Process (e.g., number of observations, number of different observers, use of the rubric, link to growth plans, observation process, training for observers, coaching):

Level and Year	Peer Review
Level 1, Years 1-3	<ul style="list-style-type: none"> • Informal observations and coaching from Mentor Teachers-general classroom or seminar (minimum of 2 observations per year)
Level 2, Years 1 & 2	<ul style="list-style-type: none"> • Informal observations and coaching from Q Comp Coordinator- general classroom or seminar (minimum of 2 observations per year)
Level 2, Year 3	<ul style="list-style-type: none"> • NA

Summative Evaluation—Outline the revised Summative Evaluation Process (e.g., frequency of summative process, number of evaluations, use of the rubric, link to growth plans, evaluations process, training for evaluators, coaching):

Level and Year	Summative Evaluation
Level 1, Years 1-3	<ul style="list-style-type: none"> ● Formal observation by principal/student services director (2 per year) ● Informal observations by principal/student services director (2 per year) ● Summative end-of-year evaluation
Level 2, Year 3	<ul style="list-style-type: none"> ● Formal observation by principal/student services director (2 per year) ● Informal observations by principal/student services director (2 per year) ● Summative end-of-year evaluation

Observations:

- Level 1 Teachers:
 - Teachers will complete both the Peer Review and Principal/SSD Observation 1 within the first 90 days of the school year and Observation 2 by the final PLC meeting.
- Level 2 Teachers:
 - Teachers will complete either the Peer Review or Principal/SSD Observation 1 before winter break and Observation 2 by the final PLC meeting.
- Lesson Observation
 - Pre-observation conference and/or documentation form will be completed at least one day prior to the observation
 - The teacher will provide learning objectives and select an evaluation domain/IGDP goal area to focus on during observation and talk through any questions or concerns they have before observation.
 - Post-observation conference will occur within a week of the observation
 - The teacher and evaluator will review lesson notes, reflect on student performance/learning, and identify areas of strength and growth from the observation and the rubric.
- Seminar Observation
 - Pre-observation conference and documentation form will be completed at least two days prior to the observation
 - The teacher will provide learning objectives and select an evaluation domain/IGDP goal area to focus on during observation and talk through any questions or concerns they have before observation.
 - Post-observation reflection questions and student work samples will be completed at least one day prior to the post-observation meeting. The post-observation meeting will occur within a week of the observation.
 - The teacher and evaluator will review lesson notes, reflect on student performance/learning, and identify areas of strength and growth from the observation and the rubric.

Individual Growth and Development Plan—Specify the changes to the teacher’s Individual Growth and Development Plan (IGDP) (e.g., the process for setting goals and plans, the goal and plan review process, documentation is required throughout the year):

- At the beginning of the school year, teachers will complete a self-assessment using the summative evaluation. Based on this reflection, they will identify their strengths and areas for growth. With the support of their division principal/student services director and the Q Comp Coordinator, teachers will develop both a professional growth goal and an instructional goal for their IGDP, and develop an action plan outlining the steps needed to achieve their goals, including timelines, resources, and supports required for success. Teachers will reflect on their progress at the end of each quarter. At the end of the year, teachers will meet with their division principal/student services director and/or the Q Comp Coordinator to review their IGDP goals and reflection.

Measures of student growth and literacy— Describe changes to the measures of student growth and literacy (e.g., how the goal is set, oversight, results, and scoring):

Student Learning Goals:

- Teachers will create Student Learning Goals (SLGs) that are measurable, standards-aligned academic growth targets based on baseline student data, standardized tests, assessments, and other student performance measures. SLGs will identify the student group, instructional timeframe, assessments used to measure growth, expected outcomes, and the rationale for the goal. Goals will be designed to be rigorous yet attainable, aligned to district and curriculum priorities, and focused on monitoring student progress and improving student achievement through ongoing instructional reflection and data analysis. Goals will be reviewed and reflected on quarterly.

Student Engagement:

- Student engagement surveys will be implemented in the Lower, Middle, and Upper Schools. Surveys may be grade-level, division-specific, or content-specific to ensure meaningful and age-appropriate feedback. Data collected will support instructional reflection, continuous improvement, and monitoring the impact of teaching practices on student engagement and achievement. Surveys will be reviewed at the end of each year and shared with the division principal/student services director on a teacher’s summative evaluation year.

Teacher Improvement Process—Provide the updated Teacher Improvement Process (TIP) (e.g., identification for the process, goal setting, support, moving out of the process): **No change**

Summative Evaluation Rubric- Identify any changes to the rubric, including:

- What rubric is being used (e.g., Danielson, 5D+, locally developed)? If locally developed, please attach.
 - *Rubrics are being updated to ensure they include culturally responsive practices and all components of the TDE plan. These will be presented and approved prior to the start of the school year.*
- What modifications have been made to the rubric?
- What is the standard of performance expected of tenured/continuing contract teachers?
- What is the standard of performance expected of probationary/non-tenured teachers, if different from tenured/continuing contract teachers?

Peer Review Rubric - use of the rubric,

- What rubric is being used (e.g., Danielson, 5D+, locally developed)? If locally developed, please attach
 - *Rubrics are being updated to ensure they include culturally responsive practices and all components of the TDE plan. These will be presented and approved prior to the start of the school year.*
- What modifications have been made to the rubric?
- What is the standard of performance expected of tenured/continuing contract teachers?
- What is the standard of performance expected of probationary/non-tenured teachers, if different from tenured/continuing contract teachers?

Core Component: Performance Pay and Reformed Salary Schedule

Are changes being made to this component? Yes No

If yes, please complete the following sections as applicable.

Salary schedule—Describe changes to how vertical movement is made on the salary schedule: [No Change](#)

Performance pay—Outline changes to the performance pay system:

- **Site Goal: \$1** for schoolwide student achievement gains will be awarded to each teacher if the schoolwide site goal (updated annually) is met.
 - Satisfactorily meeting School-Wide Student Achievement Goals: TBD in the Fall
- **Measure of Student Growth and Literacy: \$630** for measure of student growth and literacy will be awarded to each teacher if progress was made toward their individual annual student learning goal.

- **Teacher Observation/Evaluation: \$685** for teacher evaluation will be awarded to each teacher who completes all observation requirements required for their category level by the final PLC meeting.
- **Additional Measure of Performance: PLC Attendance and Participation \$484** for PLC meeting attendance and participation will be awarded to each teacher who attends PLC meetings with timely attendance (two absences allowed) and completes the Individual Growth and Development Plan, Colleague Connections, and engagement survey requirements.
- **Total Pay= \$1,800**

OPTIONAL Hiring bonus—Describe how Q Comp funding is being used for hiring bonuses for hard to staff positions (e.g., bonus amount, process for determining who receives, positions eligible): [No](#)

OPTIONAL Additional licensure—Outline how Q Comp funding is being used to provide compensation for additional licensure or grow your own systems (e.g., positions eligible, length and amount of funding): [No](#)

The undersigned hereby certifies on behalf of the district/charter school that all of the proposed changes meet statutory requirements.

Superintendent/Executive Director Name Signature Date

Local Union President Name* Signature Date

*Districts/Charter schools without a collective bargaining unit only need the signature of the superintendent/executive director on behalf of the school board.

St. Croix Preparatory Academy's 25-26 Q Comp Annual Report

This template, which may be changed as needed, is designed to help formulate the Quality Compensation (Q Comp) Annual Report. Per [Minnesota Statutes, section 122A.414, subdivision 3\(a\)](#) the report must be submitted to the school board by June 15 of each year and include findings and recommendations for the program. We also recommend that the report include a summary of what was implemented for the year, to help provide context for the findings and recommendations.

Please address the following questions for each program component, describing the implementation of the approved plan, the impact of implementation, findings from the program review, and recommendations to improve program effectiveness. All information reported should be based on the current school year. We recommend that each question be addressed with a **brief summary of 3-7 sentences**.

Core Component: Career Advancement Options

Implementation

Are the teacher leader positions implemented this year the same as those outlined in the approved plan (approval letter and subsequent plan change approval letters)?

No

If not, please explain what changes have occurred and why.

There are three academic coordinator positions in the current plan, but only two were filled due to a staff departure.

Impact

How did the work of teacher leaders through coaching, observing, mentoring, facilitating learning teams and performing other responsibilities impact classroom instruction?

Academic Coordinators (ACs) met bi-monthly with professional learning community (PLC) leaders to plan meetings based on student achievement. ACs met monthly with new teachers to offer support in classical education theory, classroom management, assessments, student engagement, seminars, and questioning. ACs also met one-on-one with new teachers throughout the school year to offer personalized support. ACs observed tier 1 and 2 teachers and provided coaching and support connected to each teacher's individual instructional and professional goals.

PLC leaders served as the point of contact between PLCs and the Curriculum and Instruction team. They gather information from PLC members regarding their professional development needs. This helped the Curriculum and Instruction team plan professional development that aligned with teachers' needs. PLC leaders also facilitated discussions on student data, enabling teachers to plan instruction based on needs identified through data analysis.

How did the work of teacher leaders impact student achievement?

Teacher leaders helped guide work related to analyzing student data. This work led teachers to adapt their instructional practices to meet students' needs.

Review Findings

How did the training teacher leaders receive impact their ability to fulfill the responsibilities of the position and meet the needs of the licensed staff members?

The ACs participated in a train-the-trainer PD series at Brightworks to prepare to train paraprofessionals on reading instruction aligned with the READ Act. Nicole attended the National Center for Teacher Residencies Mentor Professional Learning Academy.

What did the results of the evaluations of the teacher leaders in their leadership roles demonstrate about the impact they had on the effectiveness of the licensed staff members?

PLC leaders are an important connection point between division leadership and classroom teachers. They understand the needs of the division, students, and teachers in their PLC and can use that knowledge to plan effective professional development and PLC meeting agendas.

Recommendations

How will the district use the review findings to improve the effectiveness of teacher leadership?

Next year, we would like to make better use of the leadership training offered through MDE and Brightworks. MDE frequently offers training such as: Peer Coaching and Observation, Professional Learning Community (PLC) Leadership, and Q Comp Coordinator Training. All of these training sessions would be beneficial for teacher leadership positions at Prep. We will also be implementing a Mentor Teacher program next year. This will allow teacher leaders to work directly with new staff to help them acclimate to teaching at St. Croix Prep.

Core Component: Job-embedded Professional Development

Implementation

Are learning teams configured and meeting as outlined in the approved plan (approval letter and subsequent plan change approval letters)?

Yes

If not, please explain the changes that have occurred and why?

Impact

How did teacher learning from learning teams and other job-embedded professional development activities impact classroom instruction?

PLCs allowed teachers to analyze data connected to student achievement. For example, the lower school used data to better align the curriculum between kindergarten and first grade. Lower school teachers brought assessment data to PLCs, and the analysis enabled them to create plans to provide targeted support for students in reading and math. In the middle school, PLCs shared and evaluated assessments. This included evaluating the assessment prior to administration and analyzing the results after the assessment was administered. This allowed teachers to strengthen assessments across all grade levels and content areas. Middle school math and science teachers analyzed MCA data to identify gaps in student learning and developed a plan to improve instruction and strategically use IXL to provide targeted practice for students. In upper school, teachers used PLC time to collaborate, as it is often the only common planning time teachers have. Some upper school PLC members reported that the size and structure of PLCs make it difficult to focus on content-specific data and instructional strategies.

How did teacher learning from learning teams and other job-embedded professional development impact student achievement?

Lower school teachers reported that work done in PLCs strengthened instruction, leading students to progress further in the curriculum than in previous years. The Student Support Services PLC developed strategies for teachers to provide intentional, individualized movement breaks, which helped students regulate and focus, enabling them to learn.

Review Findings

How did the sites or learning teams identify needs and instructional strategies to increase student achievement?

PLC analyzed student data (such as STEP, DIBELS, Capti, MCA, and classroom assessments). This allowed teachers to identify areas of need and align practices with those needs. The middle school PLCs used a learning team cycle to guide them through analyzing data, setting goals, identifying and implementing instructional strategies to meet those goals, and monitoring progress.

How did learning teams use data and implement the selected instructional strategies and follow-up on implementation?

Teachers across all divisions used MCA data, internal assessments, semester finals, and STEP testing to guide their focus on student achievement. Many teachers used these assessments to create SMART goals within their PLCs. SMART goal topics included academic vocabulary, summarizing, and STEP assessments. Teachers also reflected on that goal during PLC time and discussed how to continue to improve student achievement.

The middle school PLCs used a learning team cycle to guide them through analyzing data, setting goals, identifying and implementing instructional strategies to meet those goals, and monitoring progress.

Recommendations

How will the district use the review findings to improve the effectiveness of job-embedded professional development?

For next year, there will be additional guidance for teachers on setting student achievement goals. Each teacher will set their own goal and track student progress. We will also utilize the learning team cycle across all divisions to help provide a better guide for data analysis work.

Core Component: Teacher Evaluation

Implementation

Are licensed staff members observed/evaluated as outlined in the approved plan (approval letter and subsequent plan change approval letters)?

No

If no, please explain the changes that have occurred and why?

Because the upper school AC position was not filled, the upper school principal completed some of the informal observation/coaching outlined in the Q Comp plan.

Impact

What impact did the observation/evaluation process, including coaching, have on classroom instruction?

Feedback from teachers on how the observation/evaluation process impacted classroom instruction included:

Lower

- Gave a chance for self-reflection
- Identify student behaviors that a teacher might not see
- Some additional ideas focused on a specific area of the lesson/instruction
- Useable action items/strategies
- Encouragement and affirmation
- Improved seminar sessions

Middle

- Reaffirmed the hard work teachers put into teaching and managing a classroom
- Constructive feedback on strategies to improve instruction and classroom management
- Instant feedback on instructional strategies, such as ways to encourage students to participate in classroom discussions
- A different perspective on what is working well or might need to be adjusted
- Feedback on classroom routines and management

Upper

- Received more targeted questions from observers
- New ideas for how to physically structure my classroom to improve classroom management
- Feedback was supportive, but didn't help them grow
- Observations left much to be desired; no clear process and rushed
- Although some conversations were helpful, there's a need for an upper school AC who is available for more collaboration

What impact did the observation/evaluation process, including coaching, have on student achievement?

Teachers reported that feedback helped improve efficiency of time, resulting in more instructional time for students. Teachers used feedback to restructure seminars, resulting in increased student participation. Tips and tricks for classroom management reduce disruptions to class time. More consistent Do Nows helped classrooms

run more efficiently. Some upper school teachers reported that formal observations had little impact on student achievement. Some upper school teachers reported that an upper school AC who knows and interacts with the same students daily is necessary for observations to have an impact on student achievement.

Review Findings

How did the feedback teachers received from each observation/evaluation assist in self-reflection and improved instructional practice?

Teacher self-reflection, both for individual observations and end-of-year reflections, shows that many teachers are eager for feedback and strategies to implement in their classrooms. Many teachers are willing to learn from each other, teacher leaders, and administrators to improve their instructional practices and student achievement.

How did the training observers/evaluators receive throughout the year impact inter-rater reliability and their ability to provide constructive and meaningful feedback to all licensed staff members?

There were no training sessions on inter-rater reliability. This needs to be integrated next year.

Recommendations

How will the district use the review findings to improve the effectiveness of teacher evaluation?

Next year, the Curriculum and Instruction team will streamline the observation process to reduce any confusion. Since teacher leadership in the Q Comp program is being restructured, only one teacher leader will complete TDE/Q Comp-related informal observations. This, however, will not address some upper school teachers' concerns about the need for an upper school-specific AC to observe and provide coaching. Feedback has made it clear that we need to provide training on the purpose of observations and feedback.

Core Component: Performance Pay and Alternative Salary Schedule

Implementation

Are the performance pay amounts and standards the same as outlined in the approved plan (approval letter and subsequent plan change approval letters)?

YES

If no, please explain the changes that have occurred and why?

Is salary schedule movement or base salary increase based on the same performance measure as outlined in the approved plan (approval letter and subsequent plan change approval letters)?

YES

If no, please explain the changes that have occurred and why?

Impact

What percentage of all licensed staff met the standard to earn performance pay for the measures of student achievement?

Site goals were based on MCA Reading IV results. This information will be reported in the fall, and the Q Comp report will be updated then.

What percentage of all licensed staff met the standard to earn performance pay for observation/evaluation results?

This will need to be updated in the fall. Summative evaluations are still being completed.

What percentage of tenured licensed staff met the standard to earn performance pay for observation/evaluation results?

N/A

What percentage of probationary licensed staff met the standard to earn performance pay for observation/evaluation results?

N/A

Is performance pay awarded for another area (besides schoolwide goals, measures of student achievement and observation/evaluation results)?

No

If yes, what percentage of all licensed staff members met the standard to earn performance pay for this other area?

N/A

What percentage of all licensed staff met the standard to earn movement on the salary schedule or an increase in base salary?

100%

What percentage of tenured licensed staff met the standard to earn movement on the salary schedule or an increase in base salary?

N/A

What percentage of probationary licensed staff met the standard to earn movement on the salary schedule or an increase in base salary?

N/A

Recommendations

How will the district use the data to improve the effectiveness of this core component?

Site goals were based on MCA Reading IV results. This information will be reported in the fall, and the Q Comp report will be updated then.

General Program Impact and Recommendations

What overall impact on instruction has the district or charter school seen as a result of implementing the Q Comp program?

Q Comp has provided valuable time for teacher collaboration. Teachers use this time to analyze student data and learn about and discuss instructional best practices. Professional development has enabled teachers to learn strategies and practices to improve student achievement. Observations and coaching have provided time for self-reflection and learning.

What overall impact on student achievement has the district or charter school seen as a result of implementing the Q Comp program?

PLCs, professional development, and feedback from observations have enabled teachers to identify areas for growth and implement instructional strategies to meet students' needs. Specifically, teachers have analyzed assessment data across all grade levels to better support students.

How will the district use the review findings to improve the overall effectiveness of the program?

For next year, we are reorganizing our program. The plan will now include one Q Comp Coordinator instead of three Academic Coordinators. Based on feedback from teachers, we reorganized PLCs to make smaller, content-specific groups. With this change, we will transition from PLC leaders to PLC facilitators and have updated the job description to reflect the assigned duties. The Q Comp Coordinator will be responsible for planning PLC meetings. PLCs will also meet twice a month instead of every week. PLC meetings will focus on student data and student achievement. The shift from PLC leaders to PLC facilitators will also allow for the creation of a Teacher Mentor program. Mentors will be responsible for supporting teachers who are new to St. Croix Prep during their first three years.

Bi-Annual Academic Coordinator Report

General Information

Coordinator Name(s): Deanna Thompson and Nicole Donnay

Reporting Period (Bi-Annual): May 2026

Section 1: SWOT Analysis

Strengths:

- Standards/Curriculum Work
 - LS - Updated ELA, Math, Social Studies, Music, Art, Phy. Ed standards/curriculum alignment documents, Updated LS Curriculum Map overview (yearlong plans)
 - MS - Finished Social Studies curriculum review; used a learning team cycle to analyze student data
 - US - Finished Social Studies curriculum review and standards alignment work in other content areas
- Curriculum Committee Members
 - Reviewed new MN Social Studies standards and created a budget for new curriculum materials
- Staff Development Committee Members
 - Created a survey for staff to share their thoughts about staff development and strategic plan preferences.
- New Staff Coaching
 - Continued monthly group and one-on-one meetings with new staff, conducted observations, supported curriculum and classroom instruction, and provided opportunities for new teachers to observe others
- Q Comp Update
 - In the process of updating Q Comp Plan - will be presented to the Board
- MnMTSS (MN Multi-Tiered System of Supports)
 - Attended Introduction to MnMTSS pathway sessions, will continue this training during 26-27 school year, work with leadership team to implement
- READ Act
 - Supported READ Act required assessment - DIBELS and CAPTI
 - 26-27 Assessment Plan K-12 - FastBridge and CAPTI

- Deanna Thompson took on additional tasks to support both MS and US teachers due to the lack of US TLC
- Nicole Donnay attended the National Center for Teacher Residencies Mentor Professional Learning Academy
- Restructuring tasks of Academic Coordinator positions for 26-27 school year for new positions:
 - Director of Teaching and Learning - Deanna Thompson
 - Q Comp & Grant Coordinator - Nicole Donnay

Weaknesses

- Change in Academic Coordinator positions, planning for 26-27 school year

Opportunities

- Strengthen Q Comp Plan for the 26-27 School year
 - implementing updates to PLCs, Content/Grade level work, teacher observations, data analysis, and mentoring
- Begin work on K-12 MnMTSS plan
- Focus on alignment between the strategic plan and the Q Comp plan
- Align work with strategic plan
- K-12 curriculum and assessment alignment
- Implement consistent K-12 curriculum review process
- Strengthen instructional practices through PD focused on evidence-based instructional practices and interventions

Threats

- Teacher turnover
- Budget cuts

Section 2: Budgetary Needs

Anticipated Needs for Next Period

- Dedicating available funds to PD opportunities that align with placement in the curriculum review cycle and updates to MN State Standards (example: Math teachers will have priority because new standards have to be fully implemented 27-28 school year)
- Adjustment in Q Comp funds for 26-27 school year - Using the same amount of funds, change in Q Comp leadership opportunities (PLC facilitators and teacher mentors)

Long-Term Financial Considerations

- Funding for outside PD

Section 3: Professional Development Plans & Feedback

Professional Development Activities

- 1/5/26 - Data/Guided Curriculum Meetings
- 1/19/26 - Data/Guided Curriculum Meetings, Learning Team Cycles, MCA Assessment Review
- 2/16/26 - PD Sessions presented by teachers that align with CEU requirements, division meetings
- 5/26/26 - End of year all staff update on the strategic plan, division meetings, PLC meeting
- Summer - Various Individual Teacher PD this spring and summer (Ex: AP training)

Feedback from Staff on PD Effectiveness

- Teachers shared that PD was most impactful when it provided practical, classroom-ready strategies such as vocabulary instruction, movement breaks, cold calling techniques, ELL supports, and hands-on STEM activities.
- Teachers reported that curriculum work and alignment to state standards strengthened instruction by identifying gaps in curriculum, improving lesson quality, and ensuring stronger mastery of essential content.
- Collaboration time during PD days was viewed as highly valuable, especially for grade-level/content teams working on curriculum development, classroom management strategies, 504 supports, and student-centered instructional practices.
- Teachers noted that PD improved student engagement and achievement through increased use of hands-on learning, movement opportunities, reading supports, and differentiated instructional strategies.
- Teachers appreciated learning from colleagues and internal presenters, particularly sessions focused on Read & Write, ELL strategies, and sharing successful classroom practices.
- Feedback emphasized that PD is most effective when it is ongoing, focused, and directly connected to daily classroom instruction and student needs. Smaller, content-specific discussions were identified as especially meaningful.

- Several staff members expressed interest in expanding opportunities for outside PD, cross-disciplinary collaboration, and more specialized training aligned to individual teaching areas and student needs.

Section 4: Additional Notes & Support Requested

Notes:

Support requested from the Board of Directors:



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**2026 Social Studies Curriculum
Adoption**



Selection Process

Lower School	<ul style="list-style-type: none"> ● Lower school social studies team collaborated with the principal and academic coordinator ● Reviewed the updated Minnesota Social Studies Standards ● Analyzed alignment between current curriculum and state standards ● Identified areas with strong standards coverage and areas for improvement ● Identified resources and instructional materials to strengthen growth areas
Middle School	<ul style="list-style-type: none"> ● Middle school social studies team collaborated with the middle school principal and academic coordinator ● Followed St. Croix Prep’s curriculum adoption cycle
Upper School	<ul style="list-style-type: none"> ● Upper school social studies team collaborated with the upper school principal and academic coordinator ● Followed St. Croix Prep’s curriculum adoption cycle

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Needs Analysis & Alignment

<p>Lower School</p>	<ul style="list-style-type: none"> ● Core Knowledge (CK) curriculum is taught in all subject areas in addition the MN State Standards ● Strength areas: History, Geography, Citizenship & Government ● Growth areas: Economics and Ethnic Studies ● Staff identified resources and instructional materials to support standards needing additional emphasis
<p>Middle School</p>	<ul style="list-style-type: none"> ● 24-25 SY - Aligned current curricula with new state standards to identify gaps and areas of weakness <ul style="list-style-type: none"> ○ Based on condition of current textbooks and gaps identified between standards and current curricula, decided to move forward with evaluating other curricular options ● 25-26 SY - Researched options and selected current textbooks plus 2 new textbooks per grade level to evaluate
<p>Upper School</p>	<ul style="list-style-type: none"> ● Aligned current curricula with new state standards to identify gaps and areas of weakness <ul style="list-style-type: none"> ○ Based on condition of current textbooks and gaps identified between standards and current curricula, decided to move forward with evaluating other curricular options ● Researched options and selected current textbooks plus 2 new textbooks per coursewl to evaluate

Evaluation of Options

Lower School	<ul style="list-style-type: none">● Evaluated resources using curriculum rubric<ul style="list-style-type: none">○ Core Knowledge curriculum○ Quality picture books● Additional resources: Imagine It! Reading, Scholastic News, online free resources, and field trips
Middle School	<ul style="list-style-type: none">● Developed rubric to evaluate curricula<ul style="list-style-type: none">○ Alignment with standards; provides opportunities for rigorous content knowledge, critical thinking, and real-world application; disciplinary literacy; diverse perspectives & cultural responsiveness; assessment & teacher support● Used rubric to evaluate each option● Chose curricula that scored highest on the rubric
Upper School	<ul style="list-style-type: none">● Developed rubric to evaluate curricula<ul style="list-style-type: none">○ Alignment with standards; provides opportunities for rigorous content knowledge, critical thinking, and real-world application; disciplinary literacy; diverse perspectives & cultural responsiveness; assessment & teacher support● AP texts were evaluated for specific AP needs● Used rubric to evaluate each option● Chose curricula that scored highest on the rubric

Budget & Sustainability - Lower School

Core Knowledge offers free downloadable materials or printed book options

Compared costs of printing/binding books to purchasing books

K - Using a teacher copy, books not necessary

1st & 2nd - Printed unit books this year, will be copied and replaced as needed

3rd - Using old textbook version, replace units that have been updated

4th - Using old textbook version, not enough changes to units to replace

Additional Resources

Picture books to fill identified growth areas, continue to look for quality books

Total cost for CK replacement units (3rd) and picture books (K & 4th) = \$3,200

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Budget & Sustainability - Middle School

Course	Title & Publisher	Price	Sustainability
Early American History	United States History: Voices and Perspectives, Early Years McGraw-Hill	\$3681.45	<ul style="list-style-type: none"> ● Classroom set of hardcover textbooks <ul style="list-style-type: none"> ○ More cost-effective ○ Less wear and tear on books ● 10 year cycle
Minnesota History	Northern Lights - 3rd Edition Minnesota Historical Society	\$37155 (Includes shipping)	<ul style="list-style-type: none"> ● Classroom set of hardcover textbooks <ul style="list-style-type: none"> ○ More cost-effective ○ Less wear and tear on books ● 10 year cycle
World History	World History: Voices and Perspectives, Early Ages McGraw-Hill	\$3681.45	<ul style="list-style-type: none"> ● Classroom set of hardcover textbooks <ul style="list-style-type: none"> ○ More cost-effective ○ Less wear and tear on books ● 10 year cycle
American History	United States History: Voices and Perspectives, Modern Times McGraw-Hill	\$5768.91 (Includes shipping for all MS McGraw-Hill)	<ul style="list-style-type: none"> ● Classroom set of hardcover textbooks <ul style="list-style-type: none"> ○ More cost-effective ○ Less wear and tear on books ● 10 year cycle

Budget & Sustainability - Upper School

Course	Title & Publisher	Price	Sustainability
Human Geography	Contemporary Human Geography Pearson	\$8100	<ul style="list-style-type: none"> ● Hardcover books ● 10 year cycle
World History	National Geographic World History Voyages of Exploration National Geographic	\$6380	<ul style="list-style-type: none"> ● Hardcover books ● 10 year cycle
AP Economics	Krugman's Economics for the AP Course BFW Publishers	\$6047.37	<ul style="list-style-type: none"> ● Hardcover books ● 10 year cycle
AP Government	American Government: Stories of a Nation BFW Publishers	\$7611.45	<ul style="list-style-type: none"> ● Hardcover books ● 10 year cycle

Implementation

Lower School	<ul style="list-style-type: none">● Use identified resources● Evaluate additional resources and continue improving on areas needing growth● Use curriculum work days for planning and implementation
Middle School	<ul style="list-style-type: none">● Utilize free professional development resources from publishers<ul style="list-style-type: none">○ Navigating online teacher resources○ Teaching With Primary Resources● Use curriculum work days for planning and implementation● Collaborate with team to develop assessments
Upper School	<ul style="list-style-type: none">● Utilize free professional development resources from publishers● Use curriculum work days for planning and implementation● Collaborate with team to develop assessments

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2025-2026 Local Literacy Plan



READ Act Goals

Division	Goal	Outcome
<p>Lower School</p>	<p>By May 2026, 88.6% of K-4 students at St. Croix Preparatory Academy will meet or exceed the DIBELS 8th Edition benchmark, as measured by the spring benchmark assessment composite score. Curriculum work focused on strong tier 1 instruction and ongoing progress monitoring will be implemented throughout the school year to support this growth.</p>	<p>Data not yet reported.</p>
<p>Middle School</p>	<p>By May 2026, the percentage of grade 5-8 students at St. Croix Preparatory Academy Middle School who meet proficiency standards on the Reading MCA IV will exceed the local district average by at least 10%, as measured by official MCA IV spring assessment results.</p>	<p>Data not yet reported.</p> <p style="text-align: right;">76</p>
<p>Upper School</p>	<p>By May 2026, the percentage of grade 10 students at St. Croix Preparatory Academy Upper School who meet proficiency standards on the Reading MCA IV will exceed the local district average by at least 10%, as measured by official MCA IV spring assessment results.</p>	<p>Data not yet reported.</p>

Screening Tools

Grade(s)	Tool	Frequency	Changes for 26-27
K-3	mCLASS with DIBELS 8th Edition	3 x per year	FastBridge: earlyReading (grades K-1) and CBM Reading (grades 1-3)
4	mClass with DIBELS 8th Edition Capti ReadBasix	3 x per year 1 x per year	FastBridge Capti ReadBasix
5-8	DIBELS Capti ReadBasix	1 x per year 1 x per year	FastBridge Capti ReadBasix
9-12	Capti ReadBasix	1 x per year	FastBridge Capti ReadBasix

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K-3 Screening Summary (as of 5/13/26)

Grade	Number of Students Universally Screened: Fall *	Number of Students At or Above Benchmark: Fall *	Number of Students Universally Screened: Winter *	Number of Students At or Above Benchmark: Winter *	Number of Students Universally Screened: Spring *	Number of Students At or Above Benchmark: Spring *
Kindergarten	90	50	90	78	84	81
1st	94	70	93	84	90	82
2nd	91	76	90	84	0 ✓ Saved	0 ✓ Saved
3rd	90	78	90	78	34	28

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K-3 Dyslexia Screening Summary

Grade	Number of Students Screened for Characteristics of Dyslexia *	Number of Students Demonstrating Characteristics of Dyslexia *
Kindergarten	90 ✓ Saved	17 ✓ Saved
1st	94 ✓ Saved	9 ✓ Saved
2nd	91 ✓ Saved	4 ✓ Saved
3rd	90 ✓ Saved	4 ✓ Saved

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4-8 Screening Summary

Grade	Total Number of Students in Grade Level	Number of Students Administered Capti ReadBasix	Number of Students Demonstrating Characteristics of Dyslexia	Number of Students Identified as Not Reading on Grade Level Who Were Opted Out of Screening
4	90	90	90	0
5	94	86	22	0
6	93	93	17	0
7	92	92	20	0
8	93	93	23	0

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9-12 Screening Summary

Grade	Total Number of Students in Grade Level	Number of Students Administered Capti ReadBasix	Number of Students Demonstrating Characteristics of Dyslexia	Number of Students Identified as Not Reading on Grade Level Who Were Opted Out of Screening
9	90	18	8	1
10	94	12	3	0
11	93	5	2	0
12	92	1	1	0

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Parent Notification and Involvement

Grades	Frequency of Notice	Method of Notification
K-4	3 x per year	Mailed letter
5-8	3 x per year	Digital messaging
9-12	1 x per year	Digital messaging

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Literacy Intervention Resources

Grade	Supplemental (Tier 2) Reading Intervention(s)	Supplemental (Tier 3) Reading Intervention(s)
Kindergarten	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support
Grade 1	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support
Grade 2	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support
Grade 3	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support
Grade 4	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support	WIN Time with teacher, educational assistant and/or reading specialists, small group, one-on-one support
Grade 5	Stari, Word Gen 5	Stari, Word Gen 5
Grade 6	Stari, Word Gen 5	Stari, Word Gen 5
Grade 7	Stari, Word Gen 5	Stari, Word Gen 5
Grade 8	Stari, Word Gen 5	Stari, Word Gen 5
Grade 9	NA	NA
Grade 10	NA	NA
Grade 11	NA	NA

Literacy Aid Funds

- Received \$74,647 in literacy aid funds
- Use of literacy funds
 - Employing reading intervention specialists

Professional Development Plan

Phase 1 PD Program

- CAREIALL
 - Completed in spring 2025

Phase 2 PD Program -

- [4 options](#) - OL&LA, CAREIALL, STRIVE, Neuhaus
 - Neuhaus Structured Literacy Modules
 - About 18 hour time commitment
 - 19 modules (about 15 minutes each)
 - 6 live sessions (45 minutes each)

FastBridge

- PD will be provided

MTSS Update

- Utilize multi-tiered systems of support but don't have a structured, K-12 MTSS plan
- A team from Prep attended MnMTSS training at Brightworks this year
 - 6 day session focused on evaluating current programs
 - focused on weaving together current programs & resources
- Will continue working on developing MTSS plan in 26-27 SY

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May 12, 2026 @ 3:15 PM - 4:15 PM, West Wing Room

Members Present: D Smith, J Standke, C Rutten, M Reichow

Guests Present: J Fuchs, B Grubisch, M Thole

- A. Food Services Presentation (Marianne)
- B. Other Contracts
 - a. ACTG
 - b. DHH
 - c. Jenie Raether
- C. Strategic Plan Initiatives
 - a. 3.1 Competitive and Sustainable Total Compensation
 - b. 3.2 Organizational Effectiveness and Shared Ownership
 - c. 4.1 Financial Health and Planning
 - d. 4.2 Transparency and Shared Understanding of Financial Realities
- D. Investment Report (Jeff S)
 - a. Final ladder schedule

SAVINGS CERTIFICATE SPECIALS

13 MONTH	\$1,000.00	\$0.00	3.60%	3.60%
7 MONTH	\$1,000.00	\$0.00	3.75%	3.75%

SAVINGS CERTIFICATES

60 MONTH	\$1,000.00	\$0.00	3.00%	3.03%
48-59 MONTH	\$1,000.00	\$0.00	3.00%	3.03%
36-47 MONTH	\$1,000.00	\$0.00	3.00%	3.03%
24-35 MONTH	\$1,000.00	\$0.00	3.25%	3.29%
12-23 MONTH	\$1,000.00	\$0.00	3.25%	3.29%
6-11 MONTH	\$1,000.00	\$0.00	0.05%	0.05%
3-5 MONTH	\$1,000.00	\$0.00	0.05%	0.05%

- b.
- c. 12-month 3.21 rate 3.25 APY
6-month 3.46 rate 3.51 APY

If you happen to see a better rate somewhere else, I can always ask for a better rate for you. Sometimes we can match.

From 25-26 Student and Family Handbook

Lower School (Grades K-4):

Retention is to remain in the same grade based on unsatisfactory performance, lack of readiness for the material in the grade, level of rigor of the expected grade, and/or social/emotional/physical readiness. This can include having grades below 3/C- in core academic coursework (reading, math, social studies, and/or science) for 2 or more quarters (not limited to the final quarter). A student may also have multiple below-proficient grades in the final quarter of the school year. If this is the case, the timeline would not be decided until the grades are final. Behavior may also be a factor in the decision. Decisions are made on a case-by-case basis.

Following is the approximate timeline procedures for grade-level retention:

Timeline	Procedures
Spring Conferences	Teacher considering recommending retention identifies the student; notifies the principal and parent (unless grades in Quarter 3 are below a 3/C-, due to the quarter ending in the spring).
After Quarter 3	The academic team, consisting of principal, teacher, and child study team will convene to discuss the retention referral. Academic team studies and secures data of academic progress and social/emotional/physical readiness. The teacher will communicate with parents the results of the discussion.
During Quarter 4	Academic team reconvenes for a final data review. A recommendation is made to the principal.
By End of Year	The principal makes the final decision. The teacher and/or principal communicate with the parents. If the parents/guardians do not agree with the principal's decision, the parents may appeal in writing to the Executive Director within 5 days after the school year ends.
Exceptions may be made to this timeline based on individual student growth/data	

Changes to process for this year

- By April 20 The Principal or Special Ed Director submits a retention request form to the Executive Director.

- By last day of school Principal and/or Special Ed Director and Executive Director meet to make final determination. Principal contacts family.

[Retention Process for 26-27](#)

ST. CROIX PREPARATORY ACADEMY

Adopted: 9/09/2024

MSBA/MASA Model Policy 721
Orig. 2016

Revised: 12/16/2025

Revised:

Rev. 20265

721 Procurement Policy ~~UNIFORM GRANT GUIDANCE 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. This policy also seeks to ensure compliance with Minnesota procurement laws governing charter schools.

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. "Competitive procurement process" means a process for procurement by sealed bids or by proposals under Minnesota Statutes, section 124E.26, subdivision 4a.

~~C.~~ "Contract" means a legal instrument by which a ~~charter school 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 Code of Federal Regulations, Part 200, does not include a legal instrument, even if the ~~charter school non-federal entity~~ considers it a contract, when the substance of the transaction meets the definition of a federal award or subaward.

~~D.~~ "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.

~~E.~~ "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 ~~charter school non-federal entity~~ for financial statement purposes, or \$10,000.

~~F.~~ "Federal award" has the meaning, depending on the context, in either paragraph 1. or 2. ~~below of this definition:~~

1. a. The federal financial assistance that a ~~charter school receives school non-federal entity 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 the charter school a non-federal~~

entity 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 ~~(2b)~~ of the definition of Federal financial assistance in 2 Code of Federal Regulations 200.1, 2 Code of Federal Regulations, section 200.40 (Federal Financial Assistance), (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.

GF. "Grants" Includes

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.

HG. "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.

IH. "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.

J. "Severance pay" is a payment in addition to regular salaries and wages by the charter school ~~non-federal entities~~ to workers whose employment is being terminated.

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 charter school.

III. PROCUREMENT METHOD OPTIONS

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).¶¶~~
- ~~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 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.~~

~~KJ. "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.~~

¶

~~LK. "Severance pay" is a payment in addition to regular salaries and wages by the non-federal entities to workers whose employment is being terminated.~~

¶

~~ML. "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 he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her 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 policies.~~

¶

~~IV. ACCEPTABLE METHODS OF PROCUREMENT~~

¶

~~A. General Procurement Standards~~

~~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 minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus-area firms are considered.¶¶~~

~~¶¶~~

~~H. 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 procedures. If small purchase 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 item is available only from a single source;¶~~
 - ~~b. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;¶~~
 - ~~c. The DOE or MDE expressly authorizes noncompetitive proposals in response to a written request from the school district; or¶~~
 - ~~d. After solicitation of a number of sources, competition is determined inadequate.¶~~

~~I. 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.¶~~
- ~~J. 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.¶~~

~~K. Non federal entities 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.~~

~~L. 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 Code of Federal Regulations, section 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. 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 Code of Federal Regulations, sections 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 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 align 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 evaluate and monitor the school district's compliance with statutes, regulations, and the terms and conditions of the federal award.¶¶~~

~~¶¶ The school district must 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 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 Code of Federal Regulations, 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 disburses the funds for program purposes.¶~~

~~C. Allowable Costs¶~~

~~The following items are costs that may be allowable under the 2 Code of Federal Regulations, 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 Code of Federal Regulations, 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 Code of Federal Regulations, 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 Code of Federal Regulations, section 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 defines the parameters for the permissible uses of federal funds. While many requirements are contained in the Omni Circular, 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 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¶¶~~

~~1. As required by the Omni Circular, all costs must be consistent with approved program plans and budgets.¶¶~~

~~2. 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¶¶~~

~~1. The school district will provide training on the allowable use of federal funds to all staff involved in federal programs.¶¶~~

~~2. 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 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 Code of Federal Regulations, section 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 Code of Federal Regulations, section 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.~~

Legal References: ~~2 C.F.R. § 200.1 (Definitions: 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 (Federal Awarding Agency Review of Merit of Proposals)~~
~~2 C.F.R. § 200.214 (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 (Financial Reporting)~~
~~2 C.F.R. § 200.339 (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. § 200.474 (Transportation Costs)~~
~~2 C.F.R. § 200.475 (Travel Costs)~~

Gross References: ~~MSBA/MASA Model Policy 208 (Development, Adoption, and Implementation of Policies)~~
~~MSBA/MASA Model Policy 210 (Conflict of Interest - School Board Members)~~
~~MSBA/MASA Model Policy 412 (Expense Reimbursement)~~
~~MSBA/MASA Model Policy 701 (Establishment and Adoption of School District Budget)~~
~~MSBA/MASA Model Policy 701.1 (Modification of School District Budget)~~
~~MSBA/MASA Model Policy 702 (Accounting)~~
~~MSBA/MASA Model Policy 703 (Annual Audit)~~

A. "Procurement by micro-purchase"

The acquisition of supplies or services when, the aggregate dollar amount of the procurement transaction 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 charter schools may choose to increase their federal micro-purchase threshold to \$25,000, which would align with the Minnesota limit. Charter schools choosing to adopt this increase must annually certify the higher threshold. The annual certification must include a justification, clear identification of the threshold, and supporting documentation of any of the following: (1) a qualification as a low-risk auditee, in accordance with the criteria established in 2 Code of Federal Regulations, section 200.520 for the most recent audit; (2) an annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or (3) a higher threshold consistent with state law.]

B. Procurement by small purchase procedures

This procurement method may be used when the value of the procurement transaction does not exceed the federal simplified acquisition threshold and is within the state threshold of \$175,000, 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). If a small purchase procedure is used, price or rate quotations must be obtained from an adequate number of qualified sources. Unless specified by the Federal agency, the charter school may exercise judgment in determining what number is adequate.

[NOTE: Despite the federal government's increase in the dollar cap for small purchases to \$250,000, Minnesota Statutes, section 471.345 limits the cap for small purchase procedures to \$175,000.]

C. Procurement by sealed bids (formal advertising)

This procurement method involves 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.

D. Procurement by competitive proposals

This procurement method 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.

E. Procurement by noncompetitive proposals

This procurement method involves procurement through solicitation of a proposal from only one source.

F. _____ A charter school procurement policy must at a minimum include:

1. conflict of interest provisions consistent with Minnesota Statutes, section 124E.14;
2. thresholds for purchases by employees without board approval;
3. thresholds for purchases that require competitive bidding procurement processes as defined in Minnesota Statutes, section 124E.02, paragraph (e), except that a competitive bidding procurement process must occur for any procurement estimated to exceed \$25,000; and

4. a prohibition on breaking up a procurement into smaller components to avoid the thresholds established in 2. and 3. above.

G. Notwithstanding Paragraph B, clause (3) above, for a procurement estimated to exceed \$25,000 but not \$175,000, the purchase may be made either by a competitive procurement process, or by direct negotiation, by obtaining two or more bids or proposals for the purchase or sale when possible and without advertising for bids or proposals or otherwise complying with the requirements of a competitive procurement process.

H. If a procurement is estimated to exceed \$175,000, a competitive procurement process must occur.

[NOTE: Article IV on Conflict of Interest has been moved to Article XI. to create a seamless set of Articles regarding procurement.]

IV. GENERAL PROCUREMENT STANDARDS

A. ~~General Procurement Standards~~The charter school must use its own documented procurement procedures ~~which~~that 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 charter school must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

C. The charter school'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. Breaking up a procurement into smaller components to avoid the thresholds established in this policy is prohibited.

D. The charter school 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 charter school 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 charter school 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 charter school of any contractual responsibilities under its contracts.

G. The charter school must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms are considered.

H. _____ Thresholds for Employee Purchases

The Executive Director and/or (insert title(s) as appropriate), in conjunction with the charter school board, is responsible for overseeing the procurement process, including establishment of procedures, internal controls, quality assurance, methods of greatest economy, and compliance with all applicable laws. To be valid, all contracts must be approved by the board, except as otherwise provided in this policy.

Individual charter school employees may incur expenditures in the following amounts without prior board approval so long as such expenditures are consistent with the charter school board-approved budget, provided that in all cases the charter school board retains authority to disapprove any expenditure for any reason at its sole discretion:

1. _____ Any charter school employee may make a purchase for use in connection with charter school operations when the expenditure is less than \$1,000 and is consistent with this policy's requirements.

2. _____ In addition to the foregoing, the following charter school employees may execute a purchase or procurement that requires the expenditure of up to the following amounts:

a. _____ Executive Director: Up to (insert dollar amount)

b. _____ (insert title): Up to (insert dollar amount)

[NOTE: The charter school board has the authority to determine whether to adopt Subparagraph H.2. In addition, the board may determine the employees to be included and the expenditure amounts to be authorized.]

V. _____ PROCUREMENT METHODS WHEN USING STATE FUNDS

The charter school must use one of the following methods of procurement when using state funds:

A. _____ Procurements for \$25,000 or less

If the amount of the contract is estimated to be \$25,000 or less, the contract may be made either upon quotation or in the open market, in the charter school's discretion. If the contract is made upon quotation it shall be based, so far as practicable, on at least two (2) quotations which shall be kept on file for a period of at least one (1) year after their receipt.

Alternatively, the charter school may award a contract for construction, alteration, repair, or maintenance work to the vendor or contractor offering the best value under a request for proposals as described in Minnesota Statutes, section 16C.28, subdivision 1, paragraph (a), clause (2), and paragraph (c).

Procurements for \$25,000 or less also may be conducted by micro-purchase.

B. _____ Procurements Exceeding \$25,000 but not \$175,000

1. _____ Sealed Bids or Direct Negotiation

If the amount of the contract is estimated to exceed \$25,000 but not to exceed \$175,000, the contract may be made either upon sealed bids or by direct negotiation, by obtaining two (2) or more quotations for the purchase or sale when possible, and without advertising for bids or otherwise complying with the requirements of competitive bidding. All quotations obtained shall be kept on file for a period of at least one (1) year after receipt thereof.

2. Best Value Alternative

As an alternative to the procurement method described in Subparagraph B.1 above, the charter school may award a contract for construction, alteration, repair, or maintenance work to the vendor or contractor offering the best value under a request for proposals as described in Minnesota Statutes, section 16C.28, subdivision 1, paragraph (a), clause (2), and paragraph (c).

C. Procurements Exceeding \$175,000

If the amount of the contract is estimated to exceed \$175,000, sealed bids shall be solicited by public notice in the manner and subject to the requirements of the law governing charter school contracts.

Procurement by Sealed Bids

Procurement by sealed bids means a process in which bids are publicly solicited and a firm fixed price contract by lump sum or unit price is awarded to the responsible bidder whose bid, conforming with all material terms and conditions of the invitation for bids, is the lowest in price. If sealed bids are used, the following requirements apply:

1. bids must be solicited from an adequate number of qualified sources, providing bidders sufficient response time prior to the date set for opening bids;
2. the invitation for bids, which includes any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
3. all bids will be opened at the time and place prescribed in the invitation for bids, and the bids must be opened publicly;
4. a firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that the discounts are usually taken advantage of;
5. any or all bids may be rejected if there is a sound documented reason; and
6. in order for a sealed bid to be feasible, the following conditions must be present:

- a. a complete, adequate, and realistic specification or purchase description is available;
- b. two (2) or more responsible bidders are willing and able to compete effectively for the business; and
- c. the procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the price.

D. Procurement by Proposals

"Procurement by proposals" means a process in which either a fixed price or cost-reimbursement type contract is awarded. Proposals are generally used when conditions are not appropriate for the use of sealed bids. They are awarded in accordance with the following requirements:

- 1. requests for proposals must be publicized and identify all evaluation factors and their relative importance. Proposals must be solicited from an adequate number of qualified offerors. Any response to publicized requests for proposals must be considered to the maximum extent practical;
- 2. the charter school must have a written method for conducting technical evaluations of the proposals received and for making selections; and
- 3. contracts must be awarded to the responsible offeror whose proposal is most advantageous to the charter school, with price and other factors considered.

VI. PROCUREMENT METHODS WHEN USING FEDERAL FUNDS

A. Procurement by Competitive Proposals

This is a procurement method used when conditions are not appropriate for using sealed bids. This procurement method may result in either a fixed-price or cost-reimbursement contract. If this method is used, the following requirements apply:

- 1. 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. Requests for proposals require public notice, and all evaluation factors and their relative importance must be identified. Proposals must be solicited from multiple qualified entities. To the maximum extent practicable, any proposals submitted in response to the public notice must be considered;
- 2. Proposals must be solicited from an adequate number of qualified sources;
- 3. The charter school must have a written method for conducting technical evaluations of the proposals received and for selecting recipients;
- 4. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and

5. The charter school 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.

B. Procurement by Noncompetitive Proposals

Procurement by noncompetitive proposals may be used only when one (1) or more of the following circumstances apply:

1. The aggregate amount of the procurement transaction does not exceed the micro-purchase threshold;
2. The item is available only from a single source;
3. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
4. The DOE or MDE expressly authorizes noncompetitive proposals in response to a written request from the charter school; or
5. After solicitation of a number of sources, competition is determined inadequate.

C. Competition

1. All procurement transactions under the Federal award must be conducted in a manner that provides full and open competition and is consistent with the standards of 2 Code of Federal Regulations, sections 200.319 and .320.

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

a. are made in accordance with 2 Code of Federal Regulations, section 200.319(b);

b. 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

c. identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

D. The charter school must ensure that all prequalified lists of persons, firms, or products ~~which are used in acquiring goods and services~~ procurement transactions are current and include enough qualified sources to ensure maximum open ~~and free~~ competition. When establishing or amending prequalified lists, the charter school must consider objective factors that evaluate price and cost to maximize competition. ~~Also, the charter school must not preclude potential bidders from qualifying during the solicitation period.~~

E. ~~Non-federal entities are~~ The charter school is 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.

F. 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 Code of Federal Regulations, section 180.215.

M. ~~The threshold for purchases by charter school employees that may be made without board approval is~~ (insert dollar amount).

~~[NOTE: The 2024 Minnesota legislature amended Minnesota Statutes, section 124E.26 to require charter schools to establish this threshold.]~~

~~[NOTE: Thresholds are now set in Article IV.H above.]~~

G. Managing Property and Equipment and Safeguarding Assets

1. Property Standards

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

The charter school must adhere to the requirements concerning real property, equipment, supplies, and intangible property set forth in 2 Code of Federal Regulations, sections 200.311, 200.314, and 200.315.

2. Managing 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:

a. 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~~ 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.

b. A physical inventory of the property must be taken and the results reconciled with the property records at least once every two (2) years.

c. 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.

d. Adequate maintenance procedures must be developed to keep property in good condition.

e. If the charter school is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

H. Cybersecurity

The charter 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 charter school district considers sensitive and is consistent with applicable federal, state, local, and tribal laws regarding privacy and responsibility over confidentiality.

[NOTE: See 2 Code of Federal Regulations, section 200.303, which establishes internal controls that the charter school must implement.]

VII. FINANCIAL MANAGEMENT REQUIREMENTS

A. Financial Management

The charter school'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 tracking of funds to a level of expenditures adequate to establish that such funds have been used in accordance with~~ according to the federal statutes, regulations, and the terms and conditions of the federal award.

B. Payment

The charter school 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 charter school and the

financial management systems that meet the standards for fund control and accountability.

Advance payments to ~~the~~ charter school must be limited to the minimum amounts needed and be timed ~~to be in accordance with the~~ actual, immediate cash requirements of the charter school 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 charter school~~non-federal entity~~ for direct program or project costs and the proportionate share of any allowable indirect costs. The charter school must make timely payment to contractors in accordance with the contract provisions.

C. Internal Controls

The charter school must establish and maintain effective internal control over the federal award that provides reasonable assurance that the charter school is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award.- These internal controls should align 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 charter school must comply with ~~the United States Constitution,~~ federal statutes, regulations, and the terms and conditions of the federal award.

The charter school must evaluate and monitor the charter school's compliance with statutes, regulations, and the terms and conditions of the federal award.

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

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

VIII. ALLOWABLE USE OF FUNDS AND COST PRINCIPLES

A. Allowable Use of Funds

The charter school administration and 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. "Advance payment" means a payment that a federal ~~awarding~~ agency or pass-through entity makes by any appropriate payment mechanism, ~~including a predetermined payment schedule, before and payment method before the~~ charter school~~non-federal entity~~ disburses the funds for program purposes.

2. "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.

3. "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:~~

4. "Omni Circular" ~~or~~ "(also known as 2 Code of Federal Regulations, part 200s," ~~the~~ "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," or the Uniform Grant Guidance) means federal cost principles that provide standards for determining whether costs may be charged to federal grants.

C. Allowable Costs

The following items are costs that may be allowable under the 2 Code of Federal Regulations, part 200, subpart E under specific conditions (review the specific part of 2 Code of Federal Regulations 200, subpart E for allowability requirements for the specific cost):

1. Advertising and public relations;
2. Advisory councils;
3. Audit costs and related services;
4. Bonding costs;
5. Compensation - personal services;
6. Compensation - fringe benefits;
7. Conferences;
8. Contingency provisions;
9. Depreciation;
10. Employee health and welfare costs;
11. Equipment and other capital expenditures;
12. Gains and losses on disposition of depreciable assets;
13. Insurance and indemnification;
14. Intellectual property;
15. Maintenance and repair costs;

16. Materials and supplies costs, including costs of computing devices;
17. Memberships, subscriptions, and professional activity costs;
18. Organization costs;
19. Participant costs;
20. Plant and security costs;
21. Pre-award costs;
22. Professional service costs;
23. Proposal costs;
24. Publication and printing costs;
25. Rearrangement and reconversion costs;
26. Recruiting costs;
27. Relocation costs of employees;
28. Rental costs of buildings and equipment;
29. Scholarships, student aid costs, and tuition remission;
30. Specialized service facilities;
31. Taxes;
32. Telecommunication and video surveillance costs;
33. Termination and standard closeout costs;
34. Training and education costs;
35. Transportation costs; and
36. Travel costs.

D. Costs Forbidden by Federal Law

2 Code of Federal Regulations, part 200s and EDGAR identify certain costs that may never be paid with federal funds. The following list below provides examples of such costs. If a cost is on this list, it may not be supported with federal funds unless an exception exists (review the specific part of 2 Code of Federal Regulations 200, subpart E for possible exceptions to unallowable costs). 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 Code of Federal Regulations, part 200, subpart Es; thus, the following list is not exhaustive:

1. Alcoholic beverages;
2. Bad debts;

3. Contingency provisions (with limited exceptions);
4. Contributions and donations
5. Entertainment (with limited exception);
6. Fines, penalties, damages, and other settlements;
7. Fundraising and investment management costs (with limited exceptions);
8. General costs of government (with limited exceptions pertaining to Indian tribal governments and Councils of Government (COGs));
9. Goods or services for personal use;
10. Interest (except interest specifically stated in 2 Code of Federal Regulations, section 200.449 as allowable);
11. Lobbying;
12. Losses on other Federal awards or contracts;
13. Selling and marketing;
14. Student activity costs;
15. Religious use;
16. The acquisition of real property (unless specifically permitted by programmatic statute or regulations, which is very rare in federal education programs);
17. Construction (unless specifically permitted by programmatic statute or regulations, which is very rare in federal education programs); and
18. 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 defines the parameters for the permissible uses of federal funds. While many requirements are contained in the Omni Circular, it includes ~~five~~ core principles that serve as an important guide for effective grant management. These core principles require all costs to be:

1. Necessary for the proper and efficient performance or administration of the program.
2. 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.
3. 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.
4. 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.
5. 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 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 charter schools 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 (3) situations:

a. Charter school uses federal funds to provide services that the charter school is required to make available under other federal, state, or local laws.

b. Charter school uses federal funds to provide services that the charter school provided with state or local funds in the prior year.

c. Charter school uses Title I, Part A, or Migrant Education Program funds to provide the same services to Title I or Migrant students that the charter school 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

1. As required by the Omni Circular, all costs must be consistent with approved program plans and budgets.

2. Costs must also be consistent with all terms and conditions of federal awards, including any special conditions imposed on the charter school's grants.

I. Training

1. The charter school will provide training on the allowable use of federal funds to all staff involved in federal programs.

2. The charter school will promote coordination between all staff involved in federal programs through activities, such as routine staff meetings and training sessions.

J. Employee Sanctions

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

K. Reduction in Aid

If the charter school makes a purchase without a procurement policy adopted by the school's board or makes a purchase not in conformity with the school's procurement policy, the Commissioner may reduce that charter school's state aid in an amount equal to the purchase.

L. Property, Financial Investments, and Contracting

A charter school is subject to and must comply with Minnesota Statutes, sections 15.054 and 118A.01 to 118A.06 governing government property and financial investments and sections 471.38, 471.391, 471.392, and 471.425 governing municipal contracting.

M. Mandatory Disclosures

The charter school 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 ~~DOE~~Federal agency, MDE, and the agency's~~MDE~~ Office of Inspector General, ~~and pass-through entity~~ (if applicable). Charter schools are also required to report matters related to ~~recipient-charter school~~ integrity and performance in accordance with Appendix XII of 2 Code of Federal Regulations, part 200~~this part~~. Failure to make required disclosures can result in any of the remedies described in 2 Code of Federal Regulations, section 200.339.

IX. 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 charter school policy ~~of the charter school~~ consistently applied to both federal and non-federal activities; and
2. Follows an appointment made in accordance with ~~the~~ charter school's written policies and meets the requirements of federal statute, where applicable.

Unless an arrangement is specifically authorized by a federal awarding agency, ~~the~~ charter school must follow its written non-federal, entity wide policies and practices concerning the permissible extent of professional services that can be provided outside the charter school 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 charter school.
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 Code of Federal Regulations, section 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 charter school'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 charter school 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 charter school's written policies ~~of the charter school~~.

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 charter school.

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 charter school's part; or circumstances of the particular employment.

C. Insurance and Indemnification

Types and extent and cost of coverage are in accordance with the charter school'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 charter school's cost accounting practices and charter school 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 charter school's reimbursement policy.~~

E. Travel Costs

Under 2 Code of Federal Regulations, section 200.475, travel costs include the transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the charter school.

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~~. The method used must be consistent with those normally allowed in like circumstances in the charter school's non-federally-funded other activities and in accordance with the charter school's reimbursement-established written 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 charter school in its regular operations ~~as a result of~~ according to the charter school's written ~~policy~~ reimbursement and/or travel policies.

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

1. Participation of the individual is necessary to the federal award; and
2. The costs are reasonable and consistent with the charter school's established ~~travel~~ written policy.

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

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

[NOTE: Noncompliance. If a charter school fails to comply with federal statutes, regulations, or the terms and conditions of a federal award, the DOE or MDE may impose additional conditions, as described in 2 Code of Federal Regulations, section 200.208 (Specific Conditions).

If the DOE or MDE determines that noncompliance cannot be remedied by imposing ~~additional-specific conditions~~, the DOE or MDE may take one or more of the following actions, as appropriate under the circumstances: (1) Temporarily withhold cash payments until the charter school takes corrective action; pending correction of the deficiency by the charter school or more severe enforcement action by the DOE or MDE; (2) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the costs for all or part of the activity associated with the noncompliance or action not in compliance; (3) Wholly or partly suspend or terminate the federal award; (4) Initiate suspension or debarment proceedings as authorized under 2 Code of Federal Regulations, part 180 and DOE regulations (or, in the case of MDE, recommend such a proceeding be initiated by the DOE); (5) Withhold further federal awards (new awards or continuation funding) for the project or program; and/or (6) Take other remedies that may be legally available.]

X. SUBRECIPIENT MONITORING

[NOTE: MDE auditors have stated that subrecipient monitoring must be covered in policy.]

A. The charter school will:

1. Verify that the subrecipient is not excluded or disqualified in accordance with 2 Code of Federal Regulations, section 180.300. Verification methods are provided in section 180.300, which include confirming in SAM.gov that a potential subrecipient is not suspended, debarred, or otherwise excluded from receiving federal funds.

2. Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the information provided below. A pass-through entity must provide the best available information when some of the information below is unavailable. A pass-through entity must provide the unavailable information when it is obtained.

a. Required information includes:

(1) Federal award identification

i. Subrecipient's name (must match the name associated with its unique entity identifier);

ii. Subrecipient's unique entity identifier;

iii. Federal Award Identification Number (FAIN);

iv. Federal Award Date;

v. Subaward Period of Performance Start and End Date;

vi. Subaward Budget Period Start and End Date;

vii. Amount of Federal Funds Obligated in the subaward;

viii. Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity, including the current financial obligation;

ix. Total Amount of the Federal Award committed to the subrecipient by the pass-through entity;

x. Federal award project description, as required by the Federal Funding Accountability and Transparency Act (FFATA);

xi. Name of the Federal agency, pass-through entity, and contact information for awarding official of the pass-through entity;

xii. Assistance Listings title and number; the pass-through entity must identify the dollar amount made available under each Federal award and the Assistance Listings Number at the time of disbursement;

xiii. Identification of whether the federal award is for research and development; and

xiv. Indirect cost rate for the federal award (including if the de minimis rate is used in accordance with 2 Code of Federal Regulations, section 200.414).

(2) All requirements of the subaward, including requirements imposed by Federal statutes, regulations, and the terms and conditions of the Federal award;

(3) Any additional requirements that the pass-through entity imposes on the subrecipient for the pass-through entity to meet its responsibilities under the Federal award. This includes information and certifications (see 2 Code of Federal Regulations, section 200.415) required for submitting financial and performance reports that the pass-through entity must provide to the federal agency;

(4) Indirect cost rate:

(5) A requirement that the subrecipient permit the pass-through entity and auditors to access the subrecipient's records and financial statements for the pass-through entity to fulfill its monitoring requirements; and

(6) Appropriate terms and conditions concerning the closeout of the subaward.

3. Evaluate each subrecipient's fraud risk and risk of noncompliance with a subaward to determine the appropriate subrecipient monitoring described in 2 Code of Federal Regulations, section 200.332, paragraph (f). When evaluating a subrecipient's risk, a pass-through entity should consider the following:

a. The subrecipient's prior experience with the same or similar subawards;

b. The results of previous audits. This includes considering whether or not the subrecipient receives a Single Audit in accordance with 2 Code of Federal Regulations, part 200, subpart F and the extent to which the same or similar subawards have been audited as a major program;

c. Whether the subrecipient has new personnel or new or substantially changed systems; and

d. The extent and results of any federal agency monitoring (for example, if the subrecipient also receives federal awards directly from the federal agency).

4. If appropriate, consider implementing specific conditions in a subaward as described in 2 Code of Federal Regulations, section 200.208 and notify the Federal agency of the specific conditions.

5. Monitor the activities of a subrecipient as necessary to ensure that the subrecipient complies with Federal statutes, regulations, and the terms and conditions of the subaward. The pass-through entity is responsible for monitoring the overall performance of a subrecipient to ensure that the goals and objectives of the subaward are achieved. In monitoring a subrecipient, a pass-through entity must:

a. Review financial and performance reports.

b. Ensure that the subrecipient takes corrective action on all significant developments that negatively affect the subaward. Significant developments include Single Audit findings related to the subaward, other audit findings, site visits, and written notifications from a subrecipient of adverse conditions which will impact their ability to meet the milestones or the objectives of a subaward. When significant developments negatively impact the subaward, a subrecipient must provide the pass-through entity with information on their plan for corrective action and any assistance needed to resolve the situation.

c. Issue a management decision for audit findings pertaining only to the Federal award provided to the subrecipient from the pass-through entity as required by 2 Code of Federal Regulations, section 200.521.

d. Resolve audit findings specifically related to the subaward. However, the pass-through entity is not responsible for resolving cross-cutting audit findings that apply to the subaward and other Federal awards or subawards. If a subrecipient has a current Single Audit report and has not been excluded from receiving Federal funding (meaning, has not been debarred or suspended), the pass-through entity may rely on the subrecipient's cognizant agency for audit or oversight agency for audit to perform audit follow-up and make management decisions related to cross-cutting audit findings in accordance with 2 Code of Federal Regulations, section 200.513(a)(4)(viii). Such reliance does not eliminate the responsibility of the pass-through entity to issue subawards that conform to agency and award-specific requirements, to manage risk through ongoing subaward monitoring, and to monitor the status of the findings that are specifically related to the subaward.

6. Depending upon the pass-through entity's assessment of the risk posed by the subrecipient (as described in 2 Code of Federal Regulations, section 200.332, paragraph (c)), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:

- a. Providing subrecipients with training and technical assistance on program-related matters;
 - b. Performing site visits to review the subrecipient's program operations; and
 - c. Arranging for agreed-upon-procedures engagements as described in 2 Code of Federal Regulations, section 200.425.
7. Verify that a subrecipient is audited as required by 2 Code of Federal Regulations, part 200, subpart F.
8. Consider whether the results of a subrecipient's audit, site visits, or other monitoring necessitate adjustments to the pass-through entity's records.
9. Consider taking enforcement action against noncompliant subrecipients as described in 2 Code of Federal Regulations, section 200.339 and in program regulations.

XI. CONFLICT OF INTEREST

A. Employee-Standards of Conduct

The charter school will maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.

B. No employee, officer, ~~or~~ agent, or board member may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, ~~or~~ agent, or board member, any member of his or her immediate family, his or her 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, and board members of the charter school may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the charter school 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, or board members of the charter school. Disciplinary actions may be undertaken pursuant to the school's Discipline, Suspension, and Dismissal of Charter School Employees policy.

[Note: The Minnesota Department of Education confirmed that the "written standards of conduct" required under 2 Code of Federal Regulations, section 200.318(c)(1) may appear in this policy, another policy and/or in an employee handbook. School boards may decide whether to adopt this section or address written standards of conduct elsewhere.]

The charter school's Conflict of Interest - Charter School Board Members policy provides additional measures regarding conflicts of interest.

C. Organizational Conflicts of Interest

If the charter school has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the charter school must maintain written standards concerning organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the charter school is unable or appears to be unable to be impartial in conducting a procurement action involving the related organization.

D. Disclosing Conflicts of Interest

The charter school ~~must~~will disclose in writing any potential conflict of interest to the federal agency or MDE in accordance with ~~applicable~~ established federal agency policies.

Legal References: Minn. Stat. § 15.054 (Sale or Purchase of State Property; Penalty)
Minn. Stat. § 16C.28 (Contracts; Awards)
Minn. Stat. § 118A.01-.06 (Deposit and Investment of Local Public Funds)
Minn. Stat. § 123B.52 (Contracts)
Minn. Stat. § 124E.02 (Definitions)
Minn. Stat. § 124E.26 (Use of State Money)
Minn. Stat. § 471.345 (Uniform Municipal Contracting Law)
Minn. Stat. § 471.38 (Claims)
Minn. Stat. § 471.391 (Declaration Form)
Minn. Stat. § 471.392 (Penalty)
Minn. Stat. § 471.425 (Prompt Payment of Local Government Bills)
18 U.S.C. (Crimes and Criminal Procedures)
31 U.S.C. §§ 3729–3733 (False Claims)
2 C.F.R. § 180.215 (Which Nonprocurement Transactions are Not Covered Transactions)
2 C.F.R. § 180.300 (What Must I Do before I Enter Into a Covered Transaction with Another Person at the Next Lower Tier?)
2 C.F.R. 200 Subpart E (Cost Principles)
2 C.F.R. 200 Subpart F (Audit Requirements)
2 C.F.R. § 200.1 (Definitions)
2 C.F.R. § 200.101 (Applicability)
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 Merit of Proposals)
2 C.F.R. § 200.208 (Specific Conditions)
2 C.F.R. § 200.214 (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(e) (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)

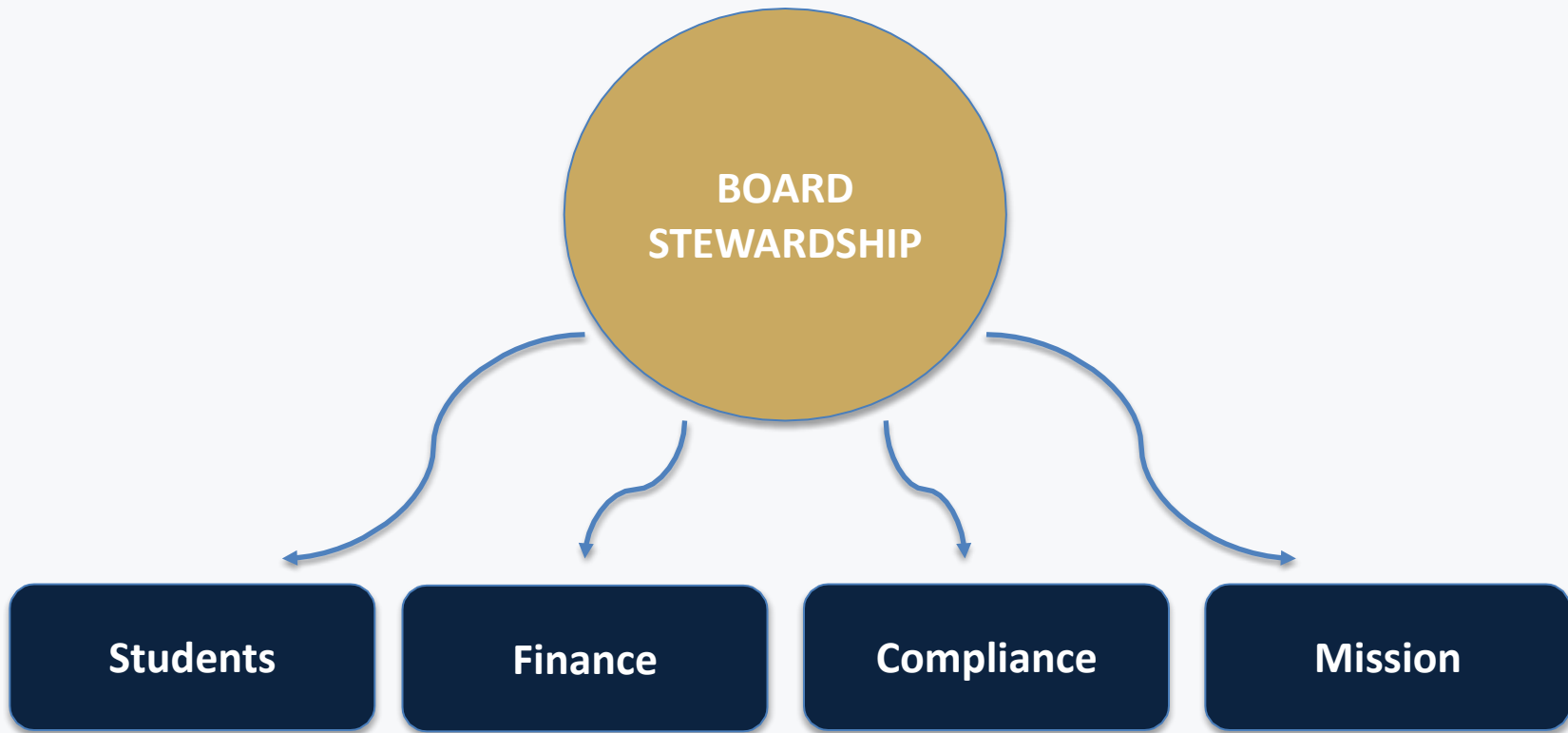
[2 C.F.R. § 200.328 \(Financial Reporting\)](#)
[2 C.F.R. § 200.332 \(Requirements for Pass-Through Entities\)](#)
[2 C.F.R. § 200.339 \(Remedies for Noncompliance\)](#)
[2 C.F.R. § 200.403\(c\) \(Factors Affecting Allowability of Costs\)](#)
[2 C.F.R. § 200.413 \(Direct Costs\)](#)
[2 C.F.R. § 200.414 \(Indirect Costs\)](#)
[2 C.F.R. § 200.415 \(Required Certifications\)](#)
[2 C.F.R. § 200.425 \(Audit Services\)](#)
[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. § 200.474 \(Transportation Costs\)](#)
[2 C.F.R. § 200.475 \(Travel Costs\)](#)
[2 C.F.R. § 200.513 \(Responsibilities\)](#)
[2 C.F.R. § 200.521 \(Management Decisions\)](#)
[45 C.F.R. § 75.2 \(Definitions\)](#)
[45 C.F.R. § 75.317 \(Insurance Coverage\)](#)
[45 C.F.R. § 75.320 \(Equipment\)](#)
[48 C.F.R. Subpart 2.1 \(Definitions\)](#)

Cross References: MSBA/MASA Model Policy 208 (Development, Adoption, and Implementation of Policies)
MSBA/MASA Model Policy 210.1 (Conflict of Interest – Charter School Board Members)
MSBA/MASA Model Policy 412 (Expense Reimbursement)
MSBA/MASA Model Policy 701 (Establishment and Adoption of Charter School Budget)
MSBA/MASA Model Policy 701.1 (Modification of Charter School Budget)
MSBA/MASA Model Policy 702 (Accounting)
MSBA/MASA Model Policy 703 (Annual Audit)

Resources: [Minnesota Department of Education \(MDE\): Procurement Handbook \[January 8, 2025\] \(accessed 01/07/26\)](#)
[MDE: Competitive Proposal Method \[April 2020\] \(accessed 01/07/26\)](#)
[MDE: Guidance on Conflicts of Interest for Charter Schools and Authorizers \[Updated January 2025\] \(accessed 01/07/26\)](#)
[Office of Management and Budget: OMB Guidance for Federal Financial Assistance \(Uniform Guidance\) \(accessed 02/20/26\)](#)
[U.S. DOE: Education Department General Administrative Regulations \(EDGAR\) and Other Applicable Grant Regulations \(accessed 01/09/26\)](#)
[U.S. DOE: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(accessed 01/09/26\)](#)



Fiduciary Responsibilities



127



Three Core Fiduciary Duties

Care • Loyalty • Obedience

Duty of Care

Prepare
Review
Ask Questions

Duty of Loyalty

Disclose
Avoid Conflicts
Act Ethically

Duty of Obedience

Follow Law
Honor Mission
Comply

128



Duty of Care

Active oversight and informed decisions

Key Governance Points

- Prepare thoroughly
- Review finances
- Monitor risks

Board Application Example

Board members review audit findings,¹²⁹ ask questions about reserve levels, and ensure appropriate financial oversight before approving the budget.

Discussion • Reflection •
Application



Duty of Loyalty

Ethical leadership and avoiding conflicts

Key Governance Points

- Disclose conflicts
- Recuse when needed
 - Protect trust

Board Application Example

130

A board member discloses a vendor relationship and abstains from discussion and voting on the contract.

Discussion • Reflection •
Application



Duty of Obedience

Following law, policy, and mission

Key Governance Points

- Follow policy
- Comply with Statute 124E
- Honor mission

Board Application Example

131

The board confirms actions comply with Open Meeting Law, procurement policy, and the charter contract.

Discussion • Reflection •
Application



Governance Under Chapter 124E

Responsibilities unique to charter schools

Key Governance Points

- Strategic oversight
- Public accountability
- Student outcomes

Board Application Example

The board focuses on long-term student¹³² success and strategic priorities while administration manages daily operations.

Discussion • Reflection •
Application



Procurement Oversight

Protecting taxpayer resources

Key Governance Points

- Competitive process
- Documentation
- Transparency

Board Application Example

133

The board ensures quotes were obtained, documentation is complete, and procurement policy was followed.

Discussion • Reflection •
Application



Affiliated Building Company

Facility and financial stewardship

Key Governance Points

- Lease aid oversight
 - Capital planning
- Long-term sustainability

Board Application Example

134

The board reviews future capital needs and understands restricted versus available facility funds.

Discussion • Reflection •
Application



Transparency & Open Meetings

Public trust and accountability

Key Governance Points

- Open Meeting Law
 - Board minutes
 - Public trust

Board Application Example

135

Board minutes accurately document motions, votes, and any declared conflicts of interest.

Discussion • Reflection •
Application



Board Reflection & Discussion

Continuous governance improvement

Key Governance Points

- Strategic focus
- Continuous learning
- Board self-assessment

Board Application Example

Board members evaluate whether ¹³⁶ current governance practices align with mission, transparency, and sustainability.

Discussion • Reflection •
Application