



Record Correction Request

HOMS Maltreatment Report / Policy 414 Routing Record

Date submitted	June 4, 2026
Correction determination deadline	July 4, 2026
Deadline basis	MGDPA correction determination deadline: 30 calendar days
Sender	[REDACTED]
Recipient	Responsible Authority / Data Practices Compliance Official, Prior Lake-Savage Area Schools
Scope	HOMS Maltreatment Report / Policy 414 Routing Record

This cover page is an index aid. The formal request body follows on the next page and controls the specific scope, authorities invoked, and requested action.

Dear Responsible Authority / Data Practices Compliance Official:

This is a formal written challenge to the accuracy and completeness of maintained data under Minnesota Statutes section 13.04, subdivision 4. To the extent the challenged records are education records directly related to my minor child and maintained by the District or a party acting for the District, this is also a FERPA request to amend inaccurate, misleading, or privacy-violating education records under 34 C.F.R. section 99.20.

I am [REDACTED] parent of the minor student/data subject. I request correction, amendment, or supplementation of maintained District records concerning the District's `2024 HOMS Maltreatment Report Complaint - Summary Report`, the District's March 13, 2025 "all responsive data" finality statement, and related records representing that PLSAS followed applicable policies while resolving my complaint concerning failure of mandated reporters to comply with the [Reporting of Maltreatment of Minors Act](#).

Challenged Records

This request challenges the accuracy and completeness of the following maintained records and any District record that repeats, relies on, or republishes the same representations:

1. Michael Thomas' January 8, 2025 response, including the acknowledgement of my request for investigation into "the failure of mandated reporters to comply with their obligations under the [Reporting of Maltreatment of Minors Act](#)."
2. Michael Thomas' January 24, 2025 response, including the statements that the requests were made under Policy 103, that the District reviewed the complaints under Policy 103, that the investigations were completed, that the "results" were enclosed, and that the District complied with relevant policies.
3. The `2024 HOMS Maltreatment Report Complaint - Summary Report`, produced with Michael Thomas' January 24, 2025 response.
4. Emily Herman's March 13, 2025 response to my February 28 and March 3, 2025 emails, including the statement that all responsive data had been provided.
5. Emily Herman's May 9, 2025 April/May response, including the statement that Title IX equal access applies during an investigation and before completion of the investigation report, that the complaint was dismissed, and that I had nonetheless received the complete investigative file with no new data added.

Basis For Correction

The maintained record sequence is materially incomplete, misleading, and internally inconsistent unless corrected or supplemented.

On January 8, 2025, Dr. Thomas acknowledged a request for investigation into failure of mandated reporters under the [Reporting of Maltreatment of Minors Act](#). The same response identified Jaclyn Lissick as the teacher involved, stated one complaint had been raised against her, stated the District had completed an investigation, and stated no final-disciplinary-disposition data existed.

On January 24, 2025, Dr. Thomas characterized my requests as made under Policy 103, stated the District reviewed the complaints consistent with Policy 103, stated the investigations were completed, and enclosed the "results." The enclosed HOMS Maltreatment Report itself shows that the District reviewed Policy 414. Policy 103 states that if a specific complaint procedure is provided within another District policy, the specific procedure shall

be followed. Policy 414 is the District's more specific mandated-reporting policy.

The District's own produced training materials make the inconsistency sharper. The public policy/training response that Emily Herman identified on March 13 as the one remaining new records request later produced mandatory-reporting training content stating that when a report involves alleged abuse or neglect in a school setting while the child is a student, a report must also be made to the Minnesota Department of Education by telephone or fax. The same training production includes Minnesota failure-to-report penalty language for school employees.

The District cannot accurately maintain all of the following without either producing a missing responsive record or correcting the maintained record:

1. The District followed all relevant policies.
2. The HOMS Maltreatment Report investigation reviewed Policy 414.
3. Policy 103 yields when another District policy supplies a more specific procedure.
4. District-produced training materials identify MDE routing for school-based maltreatment allegations.
5. The District received and responded to a request for all records relating to the chair assault, the decision not to discipline/retrain/correct the teacher, staff communications, decision-making records, meeting notes, and staff-responsibility records.
6. All responsive data was already provided.
7. No record has been produced or identified showing MDE/outside-agency routing, MDE consultation/intake, written Policy 414 follow-up, a maintained no-report/no-referral determination, staff corrective-action/no-action rationale, or any other record showing how the District satisfied the Policy 414 / Chapter 260E obligations implicated by the HOMS Maltreatment Report investigation.

March 3 / March 13 Finality Strike

On March 3, 2025, I expressly asserted that all records relating to the chair assault and all records relating to the District's **decision not to discipline** the teacher who failed to notice or intervene were key records within the active Title IX investigation and must be disclosed. I requested, among other things, investigative reports, witness statements, disciplinary actions, staff communications, teacher-response records, decision-making records, meeting notes, staff-responsibility training/policy records, and records affecting the investigation timeline and scope.

On March 4, 2025, Emily Herman confirmed that the District received that March 3 request and stated that the District anticipated a response by the end of the day on March 13, 2025.

On March 13, 2025, Emily Herman responded to the March 3 email, denied the unredacted-file request on the ground that all responsive data had been provided, and stated that all responsive data for the other requests outlined in the three emails had already been provided, except for the one newly identified public records request for records, policies, or training materials addressing staff responsibilities when witnessing acts of violence or harassment.

That March 13 finality statement is inaccurate or incomplete if PLSAS maintained any responsive Policy 414 / Chapter 260E routing record, MDE report/consultation/intake record, no-report/no-referral record, decisionmaker

record, staff corrective-action/no-action record, or other record showing how the District handled the mandated-reporting-failure investigation under the more specific Policy 414 lane.

If no such records exist, then the March 13 finality statement, the January 24 policy-compliance/results-enclosed statements, and the HOMS Maltreatment Report should be amended so they do not imply that ordinary Policy 414 / MDE routing controls were followed.

May 6 / May 9 Equal-Access Conflict

After the District dismissed the Title IX complaint, I submitted a May 6, 2025 formal data request explaining that dismissal did not end my access rights and requesting complete investigative records, all evidence gathered or generated during the investigation whether relied on or not, all communications concerning the complaint or investigation, and records I had previously asserted were key facts.

On May 9, 2025, Emily Herman responded that the 2020 Title IX regulations require the investigator to provide equal access to evidence during an investigation and before completion of the investigation report, stated the complaint was dismissed, and stated that I had nonetheless received a complete copy of the District's investigative file with redactions and that no new data had been added.

That response compounds the March 13 finality problem. The District's position appears to treat dismissal, prior redacted production, and a claimed complete investigative file as satisfying access to the key Title IX evidence universe. But the maintained record still does not identify or produce any Policy 414 / MDE routing, no-report/no-referral, staff corrective-action/no-action, or decisionmaker record for the HOMS Maltreatment Report investigation.

Requested Correction Or Supplement

Please correct, amend, or supplement the challenged records by doing one of the following:

1. Produce or identify the maintained record(s) showing the District followed the Policy 414 / Chapter 260E obligations necessitated by the HOMS Maltreatment Report investigation, including any MDE/outside-agency report, MDE consultation/intake, written follow-up, routing record, no-report/no-referral determination, decisionmaker record, staff corrective-action/no-action rationale, or record showing why Policy 414 did not require MDE routing; or
2. Amend the March 13 "all responsive data has been provided" statement, the January 24 policy-compliance/results-enclosed statements, and/or the HOMS Maltreatment Report to state that all responsive data has been provided and that the single `2024 HOMS Maltreatment Report Complaint - Summary Report` is the only maintained record available about the District's maltreatment-reporting-failure investigation, which did not include MDE reporting, MDE consultation/intake, or any maintained Policy 414 routing/no-report record, including the MDE routing for school-employee maltreatment allegations reflected in the public policy/training response that the March 13 email itself identified as the one remaining new records request.

This request does not ask the District to create a new explanation after the fact. It asks the District to produce or identify the maintained record showing Policy 414 compliance, or to correct/supplement the maintained records so they accurately state the District's represented record universe.

Prior Recipients To Notify

If the District corrects or supplements the challenged records, please attempt to notify prior recipients of the corrected or supplemented data as required by Minnesota Statutes section 13.04, subdivision 4. This includes any District official, employee, board member, legal counsel, outside counsel, insurer, consultant, agency, or third party who received, reviewed, relied on, or was given the HOMS Maltreatment Report, the January 24 response, the March 13 response, or any unredacted/source version of those records.

Required Determination And Preservation

Under Minnesota Statutes section 13.04, subdivision 4, please correct the incomplete or inaccurate data and attempt to notify past recipients, or provide a written determination that the data are accurate and complete, within 30 calendar days of receipt. If you determine the challenged data are accurate and complete, please provide the required appeal-right notice under Minnesota law.

For FERPA-covered education records, if you decline to amend the records as requested, please inform me of the decision and my right to a hearing under 34 C.F.R. section 99.21.

While this challenge is pending, please preserve the disputed data and do not disclose the disputed data unless my statement of disagreement accompanies the disclosure.

Sincerely,

A redacted signature consisting of two solid red rectangular boxes.

Table of Evidence / HOMS Maltreatment Policy 414 Correction Packet

Highlighted maintained records, policy excerpts, training excerpts, and access/finality chain

Index page 1 of 6

Exhibit	Bates link	Bookmark label	Source	Why relevant
EX-001	HMR-0007	EX-001 - January 8, 2025 Thomas response / maltreatment-failure acknowledgement	Michael Thomas Jan. 8 response; case files 340/341	Shows District acknowledgement of the mandated-reporter-failure complaint and no-final-discipline posture.
EX-002	HMR-0009	EX-002 - January 24, 2025 Thomas response / Policy 103 results enclosed	Michael Thomas Jan. 24 response; case file 337	Shows Policy 103 framing, completed-investigation posture, and production of the HOMS report as results.

Visible Bates page numbers are clickable links to the first page of each exhibit.

HMR-0001

Table of Evidence / HOMS Maltreatment Policy 414 Correction Packet

Highlighted maintained records, policy excerpts, training excerpts, and access/finality chain

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Exhibit	Bates link	Bookmark label	Source	Why relevant
EX-003	HMR-0011	EX-003 - 2024 HOMS Maltreatment Report Complaint - Summary Report	Produced Jan. 24, 2025 by Michael Thomas	Target maintained report showing review of Policy 414 and a finding section for mandated-reporting allegations.
EX-004	HMR-0013	EX-004 - PLSAS Policy 103 specific-policy override	PLSAS Policy 103	Shows Policy 103 yields when a more specific District policy supplies a procedure.

Visible Bates page numbers are clickable links to the first page of each exhibit.

HMR-0002

Table of Evidence / HOMS Maltreatment Policy 414 Correction Packet

Highlighted maintained records, policy excerpts, training excerpts, and access/finality chain

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Exhibit	Bates link	Bookmark label	Source	Why relevant
EX-005	HMR-0014	EX-005 - Policy 414 / MDE and school-employee maltreatment routing	Emily Herm [REDACTED] an. 27 policy production, [REDACTED] Data Request File 1	Shows the more specific mandated-reporting policy lane and MDE/school-employee routing language.
EX-006	HMR-0018	EX-006 - Training production excerpt / MDE reporting and failure-to-report penalties	Case file 367, [REDACTED] Data Request File 6 text extracti	Shows the District-produced training instruction on MDE reporting and Minnesota failure-to-report penalties.

Visible Bates page numbers are clickable links to the first page of each exhibit.

Table of Evidence / HOMS Maltreatment Policy 414 Correction Packet

Highlighted maintained records, policy excerpts, training excerpts, and access/finality chain

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Exhibit	Bates link	Bookmark label	Source	Why relevant
EX-007	HMR-0019	EX-007 - March 3 key Title IX evidence / all-records demand	Emily Herman June 10 production, Data Request File 7	Shows parent request identifying the chair/staff-failure universe as key Title IX evidence requiring disclosure.
EX-008	HMR-0025	EX-008 - March 4 Herman confirmation / March 13 commitment	Gmail print PDF supplied 2026-06-04; case file 42 text duplicate	Ties the March 3 all-records/key-evidence request to the promised March 13 District response.

Visible Bates page numbers are clickable links to the first page of each exhibit.

Table of Evidence / HOMS Maltreatment Policy 414 Correction Packet

Highlighted maintained records, policy excerpts, training excerpts, and access/finality chain

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Exhibit	Bates link	Bookmark label	Source	Why relevant
EX-009	HMR-0026	EX-009 - March 13 Herman finality response	Emily Herman Mar. 13 response; case file 336	Lead finality exhibit: District says responsive data has been provided except the staff-responsibility policy/training request.
EX-010	HMR-0028	EX-010 - March 13 Title IX dismissal summary report	Emily Herman Mar. 13 Title IX summary; case file 335	Shows same-day Title IX dismissal and investigative file posture.

Visible Bates page numbers are clickable links to the first page of each exhibit.

Table of Evidence / HOMS Maltreatment Policy 414 Correction Packet

Highlighted maintained records, policy excerpts, training excerpts, and access/finality chain

Index page 6 of 6

Exhibit	Bates link	Bookmark label	Source	Why relevant
EX-011	HMR-0030	EX-011 - May 6 formal data request / equal-access demand	Formal Data Request; case file 987 duplicate	Shows parent demand that dismissal did not end access rights and requests complete investigative/evidence records.
EX-012	HMR-0033	EX-012 - May 9 District response / closure and no-new-data posture	Emily Herman May 9 response; case file 1687 duplicate	Shows District's closure/dismissal framing, complete-file claim, and no-new-data position.

Visible Bates page numbers are clickable links to the first page of each exhibit.

HMR-0006



since the concussion. While you identified one peer accused of [REDACTED] the District does not have information regarding peers who allegedly engaged in physical and verbal abuse. In the absence of such information, the District has been attempting to follow up on what it has learned from witnesses.

The investigation is ongoing.

4. Clarification on “when the district intends to fulfill its obligations under MN statute 121A.49.”

Minnesota Statutes Section 121.49 refers to the process for a student who is subject to a statutory exclusion or expulsion to appeal to the Commissioner of the Minnesota Department of Education. Such statute is entirely inapplicable to this situation.

5. “[W]ritten request dated December 6th to correct inaccurate records related to this incident”

The District did not understand your December 6 email to be a request to correct data. The District shared information from its investigation regarding the number of times [REDACTED] was hit. You shared [REDACTED] input that she was hit three times initially, and then two additional times. That input will be considered in the District’s investigation. The records of the District’s investigation will accurately reflect the different reports.

6. Further, it has been 15 days since our written request for any records documenting actions taken to ensure [REDACTED] safety following this incident, as required by PLSAS Policy 406, MN statute 13.32, and 20 U.S.C § 1232g.

The District takes the safety of all students seriously. [REDACTED] attended school for a partial day between October 29 and the present. During that time, staff were not aware of ongoing issues between [REDACTED] and peers. Staff were prepared to implement the accommodations requested by [REDACTED] medical providers following her concussion.

[REDACTED] is no longer enrolled in PLSAS. If [REDACTED] re-enrolls in PLSAS, the District will work with you and [REDACTED] to determine what measures are necessary to ensure her safety at school.

7. Request for the existence and status of any charges and the final disposition of disciplinary action against the teacher involved.

The data that are public related to the teacher are the existence and status of complaints against the teacher and the final disposition of any disciplinary action. With respect to Jaclyn Lissick, one complaint has been raised against her and the status of that complaint is that the District has completed an investigation. There is no data responsive to a request for the final disposition of any disciplinary action as defined in Minnesota Statutes section 13.43, subd. 2(b).

8. “To remove any ambiguity, please consider this a formal written Discipline Complaint under Policy 103 challenging the apparent lack of disciplinary action or safety measures.”



The District will review your complaint and consider appropriate action under its policies.

- 9. We are submitting this as a formal request, in accordance with Policy 103, for an investigation into the failure of mandated reporters to comply with their obligations under the Reporting of Maltreatment of Minors Act**

The District will review your request and consider appropriate action under its policies.

- 10. Complaint regarding Title IX reporting mechanisms and request for a written apology and clear explanation of the steps being taken to comply with Title IX requirements.**

As Principal Kuboushek shared in his November 20, 2024 email, we apologize that the District's technology practices caused a delay in receiving your original email chain.

The District has and will continue to review its technology practices to ensure that its efforts to prevent inappropriate emails do not create a barrier to reporting Title IX complaints on behalf of District students or employees.

- 11. Delivery Failure Notification from 12/20**

As explained to you previously, the notice you received states that delivery to your email address failed. That appears to refer to an email sent on December 13, 2024. As explained in an email from Executive Director of Administrative Services Emily Herman on December 20, 2024, District employees did receive your December 13 email and Ms. Herman responded.

- 12. Request for Investigation Timeline Policy 506.1 and MN Stat. Chapter 260E**

You have alleged the District's response to your concerns violates District Policy 506.1. That policy applies to conduct between students or group of students. The District denies conducting an investigation based on your claims that the District's conduct constitutes bullying. As noted above, this policy applies only to students, which the District is not.

The District is not responsible to conduct investigations per the MN Stat. Chapter 260E.

Closing

The District has repeatedly answered your requests for information in good faith. Despite these efforts, you continue to seek a debate about District policies and applicable law. The District is not interested in such a debate and, as you have previously been informed, the District will respond to a formal complaint in the appropriate forum.

Sincerely,

Michael Thomas

Superintendent



January 24, 2025

Dear Mr. [REDACTED]

I write in response to your January 9, 2025 email and two emails from January 15, 2025. Consistent with my anticipated response timeline, this response is provided prior to January 24.

January 9, 2025 Email

1. Personal Property

This issue is resolved.

2. Results of Disciplinary Actions

The District responded to your request in Dr. Thomas' January 8, 2025 letter. Policy 526 regarding hazing is not applicable to the facts here because there is no indication the conduct meets the definition of hazing. Even if it were relevant, Policy 526, Section V. E states (emphasis added):

The school district is not authorized to disclose to a victim private educational or personnel data regarding an alleged perpetrator who is a student or employee of the school district. School officials will notify the parent(s) or legal guardian(s) of students who are targets or victims of hazing and the parent(s) or legal guardian(s) of alleged perpetrators of hazing who have been involved in a reported and confirmed hazing incident of the remedial or disciplinary action taken, to the extent permitted by law.

3. Written Determination for Discipline Complaint

At the outset, the District has only been informed of one [REDACTED] assault. Please identify the "second incident of [REDACTED]" so the District may properly consider it in its ongoing investigation.

The "Discipline Complaint" appears to have evolved since it was first made. The January 4, 2025 email referenced a written determination for a "Discipline Complaint submitted in writing on November 1st." In the November 1, 2024 email, you expressed concern that the discipline policy had not been followed. You observed that the Policy included consequences such as removal from class, expulsion or exclusion, referral to law



enforcement, and a behavioral readmission plan. As the District has explained to you on multiple occasions, including in the immediately preceding answer, any discipline imposed on another student is private educational data on that student to which you would not have access. The District has reviewed any discipline resulting from this incident and concluded the investigation. The results of that investigation are comprised entirely of non-public data.

Then your January 9, 2025 email characterizes the “Discipline Complaint” as “the District’s failure to take appropriate action for the physical assault.” Similarly, your January 15, 2025, 6:01 a.m., email states that “[o]ver 60 days have passed since our original complaint regarding the District’s failure to appropriately address the physical assault on our daughter.”

Having reviewed this new framing of your complaint, the investigator has determined that the District’s Discipline Complaint Policy, contained in Section XVIII of Policy 506, does not apply to the allegation that the District failed to respond to a physical assault of your daughter. Consistent with Minnesota Statutes Section 121A.61, a discipline complaint may be filed when the requirements of the Minnesota Pupil Fair Dismissal Act, including the implementation of the local behavior and discipline policies, are not being implemented appropriately. The allegation that the District did not respond appropriately to the reported incident is not an allegation that the District’s discipline policy was not followed. In addition, the District has also already investigated the sufficiency of its response based on several other complaints you have made.

Executive Director of Administrative Services Emily Herman was assigned to investigate the other concerns in your November 1 email because they involved [REDACTED] and she is the District’s Title IX Coordinator. The reasons this investigation has not been completed are explained in Dr. Thomas’ January 8, 2025 letter.

As noted, the District has investigated every allegation you have raised to the extent of our understanding of your evolving allegations. If you disagree with the District’s processes, you remain welcome to pursue relief through appropriate entities.

4. Applicability of Minn Statutes 121A.49/ 121A.61

The District’s Policies comply with Minnesota Statutes Section 121A.61 and the District complied with the relevant Policies here. As has been previously explained to you, the District cannot provide information to you about any discipline issued or not issued to other students and the reasons for any decisions about discipline.

2024 HOMS Maltreatment Report Complaint - Summary Report

Subject: Allegations of Failure to Comply with Mandated Reporting Requirements

Date: January 4, 2025

Investigator: Emily Herman, Executive Director of Administrative Services

Introduction: [REDACTED], the parent of student [REDACTED] alleges failure of mandated reporters to comply with their obligations under the Reporting of Maltreatment of Minors Act.

Allegations:

1. Failure to file a Mandated Report [REDACTED]

Investigation Process: The investigation involved:

- Reviewing [REDACTED] complaint.
- Interviewing [REDACTED]
- Examining the initial October 29 incident investigation documents.
- Review of District Policy 414

Findings:

1. Failure to Comply with Mandated Reporting Requirements Allegations:
 - Interviews were conducted [REDACTED].
Applicable district policies were also examined.

[REDACTED] The incident occurred during the 1st hour of the school day, but [REDACTED] did not report it until the following day, [REDACTED]

[REDACTED]

[REDACTED]

Conclusion with recommendations:

[Redacted content]

INDEPENDENT SCHOOL DISTRICT 719
PRIOR LAKE - SAVAGE AREA SCHOOLS**103 COMPLAINTS – STUDENTS, EMPLOYEES, PARENTS, OTHER PERSONS****I. PURPOSE**

The school district takes seriously all concerns or complaints by students, employees, parents or other persons. If a specific complaint procedure is provided within any other policy of the school district, the specific procedure shall be followed in reference to such a complaint. If a specific complaint procedure is not provided, the purpose of this policy is to provide a procedure that may be used.

II. DEFINITION**III. GENERAL STATEMENT OF POLICY**

- A. Students, parents, employees or other persons, may report concerns or complaints to the school district. While written reports are encouraged, a complaint may be made orally. Any employee receiving a complaint shall advise the principal or immediate supervisor of the receipt of the complaint. The supervisor shall make an initial determination as to the seriousness of the complaint and whether the matter should be referred to the superintendent. A person may file a complaint at any level of the school district; i.e., principal, superintendent or school board. However, persons are encouraged to file a complaint at the building level when appropriate.
- B. Depending upon the nature and seriousness of the complaint, the supervisor or other administrator receiving the complaint shall determine the nature and scope of the investigation or follow-up procedures. If the complaint involves serious allegations, the matter shall promptly be referred to the superintendent who shall determine whether an internal or external investigation should be conducted. In either case, the superintendent shall determine the nature and scope of the investigation and designate the person responsible for the investigation or follow-up relating to the complaint. The designated investigator shall ascertain details concerning the complaint and respond promptly to the appropriate administrator concerning the status or outcome of the matter.
- C. The appropriate administrator shall respond in writing to the complaining party concerning the outcome of the investigation or follow-up, including any appropriate action or corrective measure that was taken. The superintendent shall be copied on the correspondence and consulted in advance of the written response when appropriate. The response to the complaining party shall be consistent with the rights of others pursuant to the applicable provisions of Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act) or other law.

School Board Adoption: February 13, 2023

An Equal Opportunity School District

From: [REDACTED]
Sent: Sunday, December 22, 2024 2:00 PM CST
To: Emily Herman <eherman@plsas.org>; schoolboard@plsas.org <schoolboard@plsas.org>; Michael Thomas <mthomas@plsas.org>
CC: Joseph Kuboushek <jkuboushek@plsas.org>; Daniel Edwards <dedwards@plsas.org>
Subject: Re: Delivery Status Notification

With all the kerfluffle going on at the moment surrounding the teacher at Jeffers Pond who allegedly posted a hate meme, one thing I found surprising is the internal policies and procedures in that case appear to have called for a 10-day administrative leave; however, no administrative leave seems to have occurred during the "investigation" into the traumatic brain injury my child incurred under a teachers direct supervision. After reviewing PLSAS's posted policy on [Public and Private data](#), I noticed the following items clearly identified as public data in section IV -

- 16) The existence and status of any complaints or charges against the employee, regardless of whether the complaint or charge resulted in a disciplinary action;
- 17) the final disposition of any disciplinary action, as defined in Minnesota Statutes, section 13.43, subdivision 2(b), together with the specific reasons for the action and data documenting the basis of the action, excluding data that would identify confidential sources who are employees of the school district;

Additionally, from the same policy, section V

N) When a report of alleged maltreatment of a student in an elementary, middle, or secondary school is made to the Commissioner of the [Minnesota Department of Education](#) (MDE) under Minnesota Statutes, Chapter 260E, data that are relevant and collected by the school facility about the person alleged to have committed maltreatment must be provided to the Commissioner on request for purposes of an assessment or investigation of the maltreatment report. **Additionally, personnel data may be released for purposes of providing information to a parent, legal guardian, or custodian of a child** in accordance with MDE Screening Guidelines per Minnesota Statutes, Chapter 260E.15.

And from [Policy 414 - Mandated Reporting](#), section III

A3) Regardless of whether a report is made, as soon as practicable after a school receives information regarding an incident that may constitute maltreatment of a child in a school facility, **the school shall inform the parent, legal guardian, or custodian of the child that an incident has occurred that may constitute maltreatment of the child**, when the incident occurred, and the nature of the conduct that may constitute maltreatment.

B1) School officials may not disclose to the parent, legal custodian, or legal guardian the contents of the notification or any other related information regarding the interview **until notified in writing by the local welfare or law enforcement agency that the investigation or assessment has been concluded.**

B4) Where the alleged offender is believed to be a school official or employee, **the school district shall conduct its own investigation** independent of MDE and, if involved, the local welfare or law enforcement agency.

I have been in communication with Prior Lake law enforcement and MDE, and have confirmed that there are no Maltreatment Reports regarding [REDACTED] that are pending investigation or assessment; which means any obligation the school was under to withhold information surrounding such complaints is no longer in force. With this in mind, I would like to reiterate that I continue to hold on any and all records surrounding the investigation into neglect - or any other complaints involving my daughter and the incident in which she was beaten with a chair in class, initially requested Nov 1st. I would also like to note I am extremely disappointed to learn the district has so blatantly misrepresented their policies in earlier communication.

[REDACTED]
On Fri, Dec 20, 2024 at 3:00 PM [REDACTED] wrote:

Thank you for your response, Emily -

Please note the following in the logged header information returned from PLSAS's systems -

```
spf=pass (google.com: domain of [REDACTED] designates 209.85.220.41 as permitted sender) smtp.mailfrom [REDACTED] dmarc=pass (p=NONE sp=QUARANTINE dis=NONE) header.from=gmail.com;
```

This indicates that despite my email passing DMARC authentication and coming from a properly designated sender, PLSAS's networks applied a quarantine response. What was the reason behind said quarantine?

The school district is required to provide me access to evidence necessary to support the Title IX claim of discrimination against my daughter evident to the district's response to the incident in question. Your refusal for that particular request has been noted and will be included in my claim; what records are available to show that the school has done anything at all in response to the assault outside of filing an inaccurate report?

Thank you,
[REDACTED]

On Fri, Dec 20, 2024 at 2:13 PM Emily Herman <eherman@plsas.org> wrote:

HMR-0014

compliance. Your choice to highlight the insufficient apology and not speak to or acknowledge the serious concerns we raise cannot be described as a response "in good faith". Please treat this as a formal complaint stating such.

10. Delivery Failure Notification

Thank you for your response. Please note that this is different from the response I received from Emily on 12/20, which stated the block notification was the result of an email the school sent to me. While we appreciate the acknowledgement that school email policies continue to provide barriers to the District's ability to promptly reply to requests made to the school and no more action is requested, we want to highlight that indicating this is the same response we received on 12/20 is inaccurate, and thus another example of the school's not answering in "good faith". Please treat this as a formal complaint stating such.

11. Request to initiate an investigation into violations of 506.1 and MN chapter 250E

Thank you for your response. While we agree that Policy 506.1 requires intimidating, threatening, abusive, or harmful conduct between students, we do not agree with the District's interpretation that the policy only applies to students. We are stating that [REDACTED] assault on [REDACTED] and the attacks and homophobic slurs that preceded it, meet the definition of Bullying, and applicable policy should apply. [REDACTED] behavior clearly caused harm, inflicted emotional distress, and was directed towards [REDACTED] as a result of her gender and [REDACTED] identity. We note we have written assessments in which child health professionals at [REDACTED] PHP program explicitly state "She experienced **bullying** at school **including negative comments about gender expression and sexuality**," as well as "This is consistent with the challenges which prompted her referral for PHP services and with the **bullying which she endured**." **Continued denial of our request after this clarification will be met with an appeal on the grounds that peer child professionals have documented her experience as such.**

Policy 506.1 article 1 states "However, to the extent such conduct affects the educational environment of the school district and the rights and welfare of its students and **is within the control of the school district in its normal operations**, the district intends to prevent bullying and **to take action to investigate, respond to, and to remediate, and discipline for those acts of bullying which have not been successfully prevented**. As the most severe act of bullying occurred during class under a teacher's direct supervision, it was clearly under the control of the District in its normal operations. The District's failure to remediate, discipline, or take any action that generates a record towards the teacher in this case deviates from this posted policy.

Article III paragraph D states "No **teacher, administrator**, volunteer, contractor, or **other employee of the school district** shall permit, condone, or tolerate bullying."; We are unable to see how a failure to discipline or take other action towards a teacher who failed to prevent an act of bullying - one that resulted in a concussion and requires 9 months of medical intervention - can be seen as anything other than tolerance of and permitting bullying. The administration and Jaclyn Lissick are both in violation of this policy.

We want to stress *every child care professional that has been provided with the same information we provided the District in our email Nov 1st* has immediately recognized this as Bullying. Article VII paragraph D states "A teacher, **school administrator**, volunteer, contractor, or **other school employee** shall be particularly alert to possible situations, circumstances, or events that might include bullying". It is reasonable for us to expect Joe and Emily, in their particular alertness, to have noticed the same signs as signals as their peer professionals, and have identified this accordingly. It is clearly possible that bullying may be a factor in an incident that is classified by the County as 3rd degree felony assault. Scott *never interviewing [REDACTED]* as a part of his investigation cannot be categorized as being particularly alert. It is reasonable for us to expect a properly trained and senior school official who is being particularly alert for bullying would have noticed the same signs during his interview as other peer professionals and acted accordingly. These actions violate section VII paragraph D and section III paragraph D.

Article III paragraph I states "The school district will act to investigate all complaints of bullying reported to the school district and will discipline or take appropriate action against any student, teacher, administrator, volunteer, contractor, or other employee of the school district who is found to have violated this policy.", making it plainly evident that this policy does not apply only to students.

As this complaint involves Joe, the building report taker, section VII paragraph C identifies the office of the Superintendent as the appropriate forum for us to bring this complaint. We expect the District to fulfill their obligation and investigate accordingly. We also note that it is reasonable for us to expect that a senior District administrator would be familiar with District policy. The District's choice to misrepresent Policy 506.1 by stating that it only applies to students is clearly disingenuous and cannot be interpreted as a response "in good faith". Please treat this as a formal complaint stating such.

We thank the District for the responses that were made in good faith or fully resolved a request. We look forward to the District responding to the unresolved items in a manner and within a timeframe that meets their lawful obligations and provides our daughter equal protection under said law.

[REDACTED] and [REDACTED]

promptly. Furthermore, we request specific steps the District will take to support the acceptance of email reporting of complaints in compliance with Title IX requirements.

6. Policy 506.1 Violations and Failure to Investigate

- **Unresolved Issue:** The District has yet to act on our formal request to investigate violations of Policy 506.1 and Minnesota Chapter 250E related to bullying and student safety. Policy 506.1 explicitly states that all complaints of bullying violations will be investigated. The policy further mandates specific timelines, including the appointment of an investigator within three business days of receiving a complaint and the provision of a written determination within ten business days. Despite these clear requirements, no action has been taken.
- **Follow-Up Request:** We request a clear outline of the timelines the school is obligated to adhere to under Policy 506.1, including deadlines for initiating investigations and providing outcomes. Given that the District has already failed to meet the three-business-day deadline for appointing an investigator, we also request an explanation of the adjusted timeline the school intends to follow and confirmation that these revised deadlines will be met moving forward.
- **Violation:** Failure to investigate and provide appropriate disciplinary actions, especially when incidents occurred under staff supervision, represents a deviation from district policy and Minnesota law, and it undermines the protections Policy 506.1 is designed to provide.

Request for Immediate Action

Given the gravity of these issues and the significant delays already experienced, we request the following:

1. Acknowledgment of this communication within one business day.
2. A detailed timeline for addressing each of the unresolved issues outlined above.
3. Clarification of any statutory or policy-based limitations that the District believes apply to its obligations.
4. Assurance that all responses moving forward will be timely and meet the standards required under district policy and state and federal law.

If we do not receive an adequate response within five business days, we will have no choice but to escalate our concerns to state and federal authorities, including the Minnesota Department of Education and the U.S. Department of Education's Office for Civil Rights. Additionally, we will move forward with bringing our story to the attention of the media to ensure public awareness and accountability.

We remain hopeful that the District will act promptly to address these serious concerns and fulfill its obligations to ensure the safety and well-being of all students.

Sincerely,

██████████ and ██████████

On Thu, Jan 9, 2025 at 11:43 PM ██████████ ██████████ wrote:

Mr Thomas,

Thank you for your response. While we appreciate the time and effort taken to address our concerns, many responses provided fail to align with the district's obligations under state law, federal law, and PLSAS policy. We remain deeply concerned about the district's approach, which continues to deny our daughter her lawful rights and protections.

We acknowledge your preference to engage with the Department of Education as soon as possible, and share this goal. However, doing so before we have exhausted every effort to resolve our concerns using the due process accorded to us under PLSAS policy and MN law seems to aim at creating District defensibility rather than addressing the core issues directly. As much as we wish otherwise, this is the proper forum for the issues we are raising.

It is clear that the quickest and most effective resolution would have been adherence to district policies and legal obligations in response to our concerns. Failing that, a timely and substantive response to our lawful requests for policy clarification or other rights accorded to us by PLSAS policy and MN law will suffice.

1. Personal Property

We appreciate the school gathering ██████████ property and making an accommodation that limits our families' need to be exposed to Hidden Oaks. We will make arrangements for time off and come by as soon as possible. We understand from earlier communications how much the District values their iPads, and will be sure to bring the District's device with us. We acknowledge this response as being made "in good faith".

2. Results of Disciplinary Actions

its normal operations. The District's failure to remediate, discipline, or take any action that generates a record towards the teacher in this case deviates from this posted policy.

Article III paragraph D states "No **teacher, administrator, volunteer, contractor, or other employee of the school district** shall permit, condone, or tolerate bullying."; We are unable to see how a failure to discipline or take other action towards a teacher who failed to prevent an act of bullying - one that resulted in a concussion and requires 9 months of medical intervention - can be seen as anything other than tolerance of and permitting bullying. The administration and Jaclyn Lissick are both in violation of this policy.

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Article III paragraph I states "The school district will act to investigate all complaints of bullying reported to the school district *and will discipline or take appropriate action against any student, teacher, administrator, volunteer, contractor, or other employee of the school district* who is found to have violated this policy.", making it plainly evident that this policy does not apply only to students.

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We thank the District for the responses that were made in good faith or fully resolved a request. We look forward to the District responding to the unresolved items in a manner and within a timeframe that meets their lawful obligations and provides our daughter equal protection under said law.

[REDACTED] and [REDACTED]

Training Production Excerpt - Mandatory Reporting

MDE reporting instruction

If the alleged perpetrator is employed by a public pre-school, elementary school, middle school, secondary school, or charter school when the child is a student in the school, a report must also be made to the Minnesota Department of Education (MDE) by telephone or fax.

Failure-to-report penalties

Most states impose penalties, such as a fine or imprisonment, on school employees who knowingly and willfully fail to report. Minnesota imposes penalties, such as a fine or imprisonment, on school employees who knowingly and willfully fail to report.

Source locator

Extracted from plsas_pst/attachments/compliance_theater/case_file_367  Data Request File 6.pdf.txt, lines approximately 1529-1533, 1805-1806, and 1826-1827.

From: [REDACTED]
Sent: Monday, March 03, 2025 9:09 AM CST
To: Emily Herman <eherman@plsas.org>
CC: schoolboard@plsas.org <schoolboard@plsas.org>
Subject: Formal Assertion That All Records Relating to the Assault with the Chair & the District's Decision Not to Discipline the Teacher Are Key Evidence in the Active Title IX Investigation – Immediate Disclosure Required

Dear Emily,

I am formally asserting that all records relating to the assault against my daughter involving a chair in the classroom, as well as all records relating to the District's decision not to discipline the teacher who failed to notice or intervene in the assault, are key records within the scope of the active Title IX investigation. These records must be disclosed in full and included in the ongoing Title IX investigation under both federal and state law.

1. The Chair Attack & the Teacher's Failure to Intervene Are Integral to the Title IX Investigation

Although the assault with the chair occurred before the Title IX investigation began its relevance to the investigation is clear based on the following:

- The attack was perpetrated by a student in the same peer group as the individual who was [REDACTED] and bullying my daughter.** This establishes a direct connection between the perpetrators of both incidents, indicating a pattern of targeted harassment against my daughter.
- The attack occurred in the same environment—during class, with a teacher present—where other instances of abuse and bullying took place.** The teacher's failure to intervene in both incidents demonstrates a potential pattern of negligence by school staff, which must be examined under Title IX's requirement that schools take action to prevent and address sex-based harassment.
- The District's failure to enforce its disciplinary policies in response to the attack raises concerns about its response to harassment generally.** Under Title IX (34 C.F.R. § 106.44(a)), a school is required to take appropriate action when it has actual knowledge of harassment or a hostile educational environment. The District deviated from its own disciplinary policies without explanation, and this failure to hold students and staff accountable for their actions is relevant to how it responds to the broader pattern of harassment against my daughter.
- The District's failure to discipline the teacher who failed to intervene in the assault demonstrates a broader failure to address systemic inaction in response to harassment.** This failure is compounded by the fact that the Title IX investigation has now been ongoing for months with little to no progress.
 - To date, it appears that only four students have been interviewed, and there is no indication that the District has spoken to the teacher who was present during the chair attack or the [REDACTED] incidents.
 - No disciplinary action, retraining, or corrective measures have been implemented for the teacher's failure to notice or respond to the in-class assault.
 - The lack of investigative progress calls into question whether the District is fulfilling its Title IX obligations or deliberately prolonging the investigation to avoid accountability.
 - The failure to discipline the teacher in this case is not an isolated incident but rather part of a broader failure to protect students from harassment and abuse, further reinforcing the need for full transparency.
- The ongoing bullying by the same peer group is central to assessing whether my daughter has been subjected to a "hostile educational environment" under Title IX.** The U.S. Supreme Court in *Davis v. Monroe County Board of Education*, 526 U.S. 629 (1999) established that harassment must be "severe, pervasive, and objectively offensive" to be actionable under Title IX. The District cannot evaluate the full impact of the harassment my daughter endured without including the assault and the teacher's inaction as part of this investigation.

2. MN Stat. 13.32 Does Not Override the District's Title IX Obligations

I recognize that the District has previously denied access to these records under MN Stat. 13.32, asserting that they contain private student and personnel data. However, Title IX (34 C.F.R. § 106.45) requires full access to relevant records during an official investigation and takes precedence over conflicting state law.

If the District continues to withhold these records, I am formally demanding that you provide statutory justification for why MN Stat. 13.32 overrides the District's obligations under Title IX to disclose relevant records during an active investigation.

3. Formal Request for Immediate Disclosure Under Title IX & MN Stat. 13.32

Pursuant to Title IX (34 C.F.R. § 106.45) and MN Stat. 13.32 I am formally requesting the immediate disclosure of all records relating to the assault with the chair and the decision-making process regarding the failure to discipline the teacher, including:

- All investigative reports, witness statements, and disciplinary actions related to the chair attack.
- Any and all communications between school staff regarding the incident.
- Records of the teacher's response (or lack thereof) during the attack.
- Records of the District's decision-making process regarding disciplinary action against the attacker and any deviation from written policy.
- All records, meeting notes, and communications related to the District's **decision not to discipline**, retrain, or otherwise address the teacher's failure to intervene.
- Any records, policies, or training materials addressing staff responsibilities when witnessing acts of violence or harassment.
- Any documentation regarding delays, obstacles, or decisions affecting the timeline and scope of the Title IX investigation.

These records **must be provided in full, without redactions, unless a specific legal provision explicitly requires a redaction**. If the District **chooses to redact any portion of these records, it must cite the precise statutory authority for doing so**.

4. Request for update

It has been a full business day since the District received our request that they address the inappropriate redactions found in earlier responses, or provide the statutory basis under which these redactions are appropriate. I note the statutory basis should have been provided with the responsive data. As an example, the fact that the District has needed more than a full business day to provide the statutory basis under which a message id was redacted from email logs provides the impression that the information was redacted without concern to the District's legal right to do so. Please provide acknowledgement of receipt and an explanation for why it has not been possible to provide any response to any of the failures that have already been brought to the District's attention.

Thank you,


From: Emily Herman <eherman@plsas.org>
Sent: Tuesday, March 04, 2025 1:54 PM CST
To: [REDACTED]
Subject: Emails Confirmation

Hi [REDACTED]

This is confirmation that the District has received the following emails:

1. (no subject) - Friday, February 28, 2025 at 6:19 AM
2. Request for update - Friday, February 28, 2025 at 9:56 AM
3. Formal Assertion That All Records Relating to the Assault with the Chair & the District's Decision Not to Discipline the Teacher Are Key Evidence in the Active Title IX Investigation – Immediate Disclosure Required - Monday, March 3, 2025 at 9:09 AM

We are looking into your complaints and will provide responses as required by law. We anticipate a response by the end of the day on March 13, 2025.

Thank you,
Emily

Emily Herman
Executive Director of Administrative Services
Title IX Coordinator & Human Rights Officer
Prior Lake-Savage Area Schools
952-226-0021

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HMR-0021

From: [REDACTED]
Sent: Tuesday, March 04, 2025 6:18 PM CST
To: Emily Herman <eherman@plsas.org>; schoolboard@plsas.org <schoolboard@plsas.org>
Subject: Re: Emails Confirmation

Thank you for your response, Emily,

Your proposed timeline is insufficient. We are demanding **immediate compliance** with the District's **ongoing legal obligations** under FERPA (20 U.S.C. § 1232g), Title IX (34 C.F.R. § 106.45 & § 106.71), and the **Minnesota Government Data Practices Act (Minn. Stat. Ch. 13)**.

The District's **pattern of noncompliance** is now indisputable. Since the **January 24, 2025 response**, the District has engaged in an **escalating pattern of obstruction, excessive and unjustified redactions, and failures to provide legally mandated statutory justifications for withheld information**. These ongoing violations are **clear and irrefutable evidence of retaliation under Title IX (34 C.F.R. § 106.71)**.

Rather than fulfilling its legal obligations, the District has **deliberately delayed, denied, and obstructed access to critical records and evidence, directly interfering with the Title IX process**. These actions serve no legitimate purpose beyond creating barriers to transparency, accountability, and due process.

Immediate Action Required by March 6, 2025

The following violations must be corrected without delay:

1. Immediate Compliance with FERPA and Minnesota Statute 13

- The District has failed to meet the legal standard for responding to at least **three separate FERPA and Minnesota Government Data Practices Act (MGDPA) requests**, exceeding legally allowed responses.
- **Minn. Stat. § 13.03, subd. 2(a) explicitly requires that government data be provided immediately if possible**. The District has failed to meet this standard by withholding information that should have been provided.
- Under FERPA (34 C.F.R. § 99.10(b)), records must be provided within **45 days** at most, but investigative records **directly related to a Title IX matter** must be provided **immediately** (34 C.F.R. § 106.45(b)(5)(v)).
- **Title IX (34 C.F.R. § 106.45(b)(5)(vi))** requires that **all evidence directly related to the allegations** be provided to the complainant—this requirement has been **blatantly ignored**.
- By **withholding or delaying these records**, the District is further demonstrating noncompliance with both FERPA and Title IX.

2. Justification for All Redactions and Withheld Information

- The District has repeatedly failed to provide a **legally required statutory basis** for its redactions and omissions.
- **Minn. Stat. § 13.03, subd. 3(f)** requires the District to:
 - **State whether the data exists**
 - **Cite the specific statutory authority for withholding it**
 - **Provide a redacted version unless no portion can be disclosed**
- The current response fails on all counts.

3. Disclosure of All Title IX-Related Investigation Records

- Under Title IX (34 C.F.R. § 106.45(b)(5)(vi)), "all evidence directly related to the allegations" must be made available for review.
- The District's continued refusal to produce these records constitutes **not just noncompliance but active interference with an ongoing federal investigation**.

The District's Retaliation is Now Unquestionable

The failures of the District since January 24, 2025, are not just improper—they are retaliatory.

The District has:

- **Systematically delayed responses beyond legally allowable timeframes**
- **Refused to provide legally mandated explanations for withheld data**
- **Engaged in excessive and unjustified redactions to obstruct access to critical evidence**
- **Blatantly ignored obligations under Title IX, FERPA, and Minnesota law**

This behavior is a **clear violation of 34 C.F.R. § 106.71, which prohibits retaliation against individuals engaging in a Title IX process**. The District's obstruction directly **discourages participation and hinders the ability to pursue legitimate claims**—the very definition of retaliation under federal law.

The District's Conduct is Already Evidence in Regulatory Action

We are well aware that the District's continued **noncompliance, obstruction, and failure to provide statutorily required records** is a **violation of federal and state law**.

As such:

- **A formal Title IX retaliation complaint is being filed with the U.S. Department of Education's Office for Civil Rights (OCR)**.
- **A Minnesota Data Practices Act complaint is being filed with the Department of Administration regarding the District's failure to provide required justifications for redactions under Minn. Stat. § 13**

Every additional delay, failure to provide records, or refusal to comply only serves to **strengthen these cases and increase the likelihood of regulatory sanction**.

Production of Unredacted Investigative Reports or Specific Legal Basis for Redactions

In addition to the District's **ongoing failures to comply with its legal obligations**, we are submitting a **formal request** for the immediate disclosure of **unredacted investigative reports** or, in the alternative, a **legally valid statutory basis for each redaction**.

The **Weapons Policy Investigation Report** and **Maltreatment Report** provided on January 24th contain **excessive and unjustified redactions** that obscure key factual information **central to both student safety and the District's Title IX obligations**.

Legal Obligations for Disclosure

1. **Minn. Stat. § 13.03, subd. 3(f)** requires the District to provide a **specific statutory basis** for each redaction **at the time of disclosure**.
2. **FERPA (34 C.F.R. § 99.10-99.12)** grants parents the **right to access all education records directly related to their child**, which includes **investigation reports and any findings or determinations regarding the child**.
3. **Title IX (34 C.F.R. § 106.45(b)(5)(vi))** mandates that **all evidence directly related to the allegations** be made available to the complainant **without delay**.
4. **Minn. Stat. § 121A.64** requires that the District **provide a meaningful summary report** when an investigation has been conducted. This summary must include:
 - **The findings of fact** surrounding the incident.
 - **A clear and substantive statement** regarding the basis of the District's determination.
 - **Corrective actions taken** or the rationale for choosing not to take action.
 - **Any implications for school safety** resulting from the investigation.

The **current redactions and omissions** render the reports **insufficient to meet this standard**, as they fail to provide the **necessary transparency** required for meaningful oversight and accountability.

Public Interest & Broader Safety Concerns

Certain investigation records **may not be shielded as private data** if they pertain to **broader student safety concerns**. Specifically:

- **Whether the District's failure to classify the chair as a weapon under Policy 501 resulted in inadequate student protections**.
 - Policy 501 explicitly outlines that **any object capable of causing bodily harm can be classified as a weapon**. If a pencil has been classified as a weapon in disciplinary contexts, it is **indefensible** for the District to refuse to classify the chair as a weapon.
 - The District's failure to apply Policy 501 appropriately raises critical concerns about **how future incidents will be handled**.
- **Administrative Decisions on Policy Application & Future Safety Practices**
 - If **administrators made discretionary determinations** that impact the **future enforcement of Policy 501**, those determinations **may not be shielded under private data protections**.
 - Any **policy interpretation that weakens student protections** is a **matter of public interest** and must be **subject to transparency** to ensure that **all students receive the protections mandated by law**.

Failure to Disclose is Obstruction

By **failing to disclose** this information in full—or by refusing to **provide legally valid justifications** for the redactions—the District is:

1. **Obstructing access to critical evidence in a Title IX investigation** in violation of **34 C.F.R. § 106.45(b)(5)(vi)**.
2. **Denying parents access to their child's education records** in violation of **FERPA (34 C.F.R. § 99.10-99.12)**.
3. **Failing to provide a legally required summary of findings** under **Minn. Stat. § 121A.64**, which governs the reporting of investigative outcomes.
4. **Potentially concealing matters of public safety interest**, which **cannot be shielded as private data** when they affect **student protections and future policy applications**.

Final Demand

The District must fully comply with its legal obligations no later than March 6, 2025.

- Failure to meet this deadline will be documented as additional evidence of noncompliance.
- This is not a negotiation. The law is clear, and the District is already in violation.

We expect written confirmation of the District's intent to fully comply by March 5, 2025.

Sincerely,

[Redacted] and [Redacted]

On Tue, Mar 4, 2025 at 1:54 PM Emily Herman <eherman@plsas.org> wrote:

Hi [Redacted]

This is confirmation that the District has received the following emails:

1. (no subject) - Friday, February 28, 2025 at 6:19 AM
2. Request for update - Friday, February 28, 2025 at 9:56 AM
3. Formal Assertion That All Records Relating to the Assault with the Chair & the District's Decision Not to Discipline the Teacher Are Key Evidence in the Active Title IX Investigation - Immediate Disclosure Required - Monday, March 3, 2025 at 9:09 AM

We are looking into your complaints and will provide responses as required by law. We anticipate a response by the end of the day on March 13, 2025.

Thank you,
Emily

Emily Herman
Executive Director of Administrative Services
Title IX Coordinator & Human Rights Officer
Prior Lake-Savage Area Schools
952-226-0021

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From: Emily Herman <eherman@plsas.org>
Sent: Wednesday, March 26, 2025 2:37 PM CDT
To: [REDACTED]
Subject: Data Request

Hi [REDACTED]

Please find the linked responsive data for the "any records, policies, or training materials addressing staff responsibilities when witnessing acts of violence or harassment" public data request. Access to the link will expire on April 25th at 11:59 PM.

For the policies, all district policies are listed online at <https://www.plsas.org/about-us/school-board/board-policies>.

To facilitate effective communication, we strongly encourage you to use the Data Request Form, which can be accessed here: [Data Request Form](#).

Thank you,
Emily

[REDACTED] Data Request File 6.pdf

Emily Herman
Executive Director of Administrative Services
Title IX Coordinator & Human Rights Officer
Prior Lake-Savage Area Schools
952-226-0021

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Emails Confirmation

4 messages

Emily Herman <eherman@plsas.org>

Tue, Mar 4, 2025 at 1:54 PM

To: [Redacted]

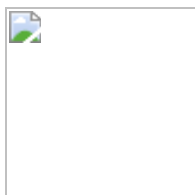
Hi [Redacted]

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Thank you,
Emily



Emily Herman
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 Thank you.

To: Emily Herman <eherman@plsas.org>, schoolboard@plsas.org

Tue, Mar 4, 2025 at 6:18 PM

Thank you for your response, Emily,

Your proposed timeline is insufficient. We are demanding **immediate compliance** with the District's **ongoing legal obligations** under **FERPA (20 U.S.C. § 1232g)**, **Title IX (34 C.F.R. § 106.45 & § 106.71)**, and the **Minnesota Government Data Practices Act (Minn. Stat. Ch. 13)**.

The District's **pattern of noncompliance** is now indisputable. Since the **January 24, 2025 response**, the District has engaged in an **escalating pattern of obstruction, excessive and unjustified redactions, and failures to provide legally mandated statutory justifications for withheld information**. These ongoing violations are **clear and irrefutable evidence of retaliation under Title IX (34 C.F.R. § 106.71)**.

March 12, 2025

Dear Mr. [REDACTED]

I am writing in response to your two emails dated February 28, 2025, and your email from March 3, 2025. The District has made every effort to provide you with the requested information promptly while managing the numerous other responsibilities of our staff. As outlined in my expected response timeline, I am providing this response on the anticipated date of March 13, 2025.

1. Demands for unredacted files

The District denies this request. All responsive data has been provided. Redactions of private educational data on students other than your child have been made pursuant to Minn. Stat. § 13.32. Private personnel data has been redacted pursuant to Minn. Stat. § 13.43.

2. Multiple requests to create data

In the three emails referenced, you have made several repetitive demands for the District to generate data. Under the Minnesota Government Data Practices Act, the District is not obligated to respond to inquiries, engage in debates, or create new data in response to such demands. To date, existing responsive data has been provided in accordance with the evolving requests and numerous emails received. The District has consistently responded to requests in good faith, despite the complaints and requests continuing to evolve without a clear or defined resolution being articulated from your end.

3. Repeated data request

All emails exchanged between [REDACTED] and the four listed district email addresses have been provided in PDF format, along with PST file format. The PST file enables the recipient to access the requested header information. Please note that when the District conducts email searches between specific addresses, the system does not filter or block any emails, nor does it retain rejected or undelivered messages. As such, the District has no further responsive data beyond what has been provided.

Additionally, the District is unclear on what further information you are requesting regarding a "full email log." You have already received the full set of emails from our system in PDF format, as well as the PST file, which allows you to review the requested header details.

4. Data request clarification

In one of your emails, you requested a full, unredacted version of page 4 of the [REDACTED] Data Request File 3," which states "Document is unavailable." This page pertains to the audio file retrieved by the system as part of the data request. When the system processes the data request into a PDF, it generates a corresponding page for the audio file. Please note that the audio file was included in the email sent on February 13, 2025. There is no additional responsive data for this request.



5. New public data request

Upon reviewing the three emails, we have identified one new public records request for "any records, policies, or training materials addressing staff responsibilities when witnessing acts of violence or harassment." We will begin gathering the requested data and respond as soon as possible. Since neither you nor your student is the subject of this request, it will be processed in accordance with the procedures for existing public records requests. As noted above, all responsive data for the other requests outlined in the three emails has already been provided.

6. Investigation into claims of [REDACTED]

The District made several attempts to gather information from your student, offering various options, including written responses in lieu of a live interview, but all attempts were declined. As a result, the investigation was limited by the absence of crucial details such as witness names, timelines, and evidence. Nevertheless, the District conducted a thorough investigation by interviewing staff and students associated with your student. Despite these efforts, the investigation could not substantiate the allegations due to the lack of concrete evidence and inability to identify the respondent/s. Attached you will find a written determination.

Closing

Going forward, the District will only respond to data requests that are properly submitted. To facilitate effective communication, we strongly encourage you to use the Data Request Form, which can be accessed here: [Data Request Form](#)

As outlined in Dr. Thomas's response on January 24th, the District is unable to continue addressing repeated and evolving complaints submitted under various headings through multiple, demanding emails with increasingly short and arbitrary timelines. District staff have consistently addressed each of your concerns in a timely and good-faith manner. Despite these efforts, you continue to seek debates regarding District policies and applicable law. The District is not engaged in such debates. Should you disagree with the District's processes, you are welcome to seek relief through the appropriate entities.

Sincerely,

Emily Herman
Executive Director of Administrative Services

CC: Dr. Michael Thomas, Superintendent

2024 District Wide Title IX Reporting Complaint - Summary Report

Subject:

Date: November 1, 2024 (email failed) received on November 15, 2024

Investigator: Emily Herman, Executive Director of Administrative Services

Introduction: [REDACTED], the parent of a former student, alleges that his student [REDACTED] was subject to [REDACTED] orientation.

Allegations:

1. [REDACTED] claims that [REDACTED] was subject to physical and verbal abuse by peers including [REDACTED]
2. [REDACTED] claims that [REDACTED] was subject to [REDACTED] by another student

Investigation Process:

 The investigation involved:

- Reviewing [REDACTED] complaint.
 - [REDACTED] denied multiple attempts by District to conduct an interview or have [REDACTED] submit answers to interview questions electronically
- Interviewing [REDACTED] assigned teachers
- Interviewing Dean
- Interviewing [REDACTED] Counselor
- Interview [REDACTED] peers that District could identify
- Review of District Policy 413, 506, and 522
- Consult with Legal regarding Title IX

Findings:

The District made multiple efforts and offered various methods for [REDACTED] to provide information regarding the complaint, including the option to submit written responses to questions instead of participating in a live interview. However, [REDACTED] declined for [REDACTED] to provide this information. As a result of the District's inability to obtain details from [REDACTED] about the allegations, the investigation lacked crucial information such as witness names, involved students, respondent/s information, timelines, locations, and factual evidence necessary for a thorough examination. It was communicated to [REDACTED] that the denial of interview substantially impacted the timeline and district's ability to look into the allegations.

Without sufficient initial details, the District interviewed [REDACTED] counselor, dean, and assigned teachers to identify potential peers for interviews and to determine if any concerns had been witnessed or reported by staff members. All interviewed staff stated that neither [REDACTED] nor other students reported any concerns related to the allegations. Also, all interviewed staff did not report witnessing any concerning interactions between [REDACTED] and peers.

Three students were identified as potential peers of [REDACTED] and were subsequently interviewed. These students stated that [REDACTED] had mentioned generic concerns about peer interactions on one occasion during her time at the school and [REDACTED] did not provide specific details. The only specific concern reported—regarding self-harm—was reported to student support services and addressed. None of the students reported witnessing or hearing any concerning interactions between [REDACTED] and peers. After [REDACTED] was no longer enrolled with the District, one student, however, mentioned hearing similar allegations to those in the report [REDACTED] submitted. This student was informed by [REDACTED] during winter break, nearly two months after [REDACTED] had left the District.

The District also interviewed one peer that was potentially the alleged offender. That individual confirmed knowing [REDACTED] and having two classes with her, but denied any [REDACTED] using homophobic or hurtful language, or causing [REDACTED] to feel uncomfortable.

Given the [lack of concrete details in the allegations], including any specifics on the alleged respondent/s, the District conducted the investigation to the best of its ability. However, the interviews conducted did not provide evidence to identify respondent/s and/or substantiate the allegations.

Conclusion with recommendations: In conclusion, while the District made diligent efforts to investigate the allegations [without the vital details for the allegations], it was [unable to identify] the respondent and/or find evidence to substantiate the allegations. In the absence of additional information from [REDACTED] identifying the respondent/s and/or providing essential details, this complaint is [dismissed] due to the District's [inability to identify the respondent/s]

records law, recognizing that the **public's right to know must be balanced with FERPA** (students' names were removed). While that case involved a third-party request, it underscores that even in the public domain context, schools can be compelled to release Title IX records with appropriate redactions. Here, my request is far more compelling: I am **not a third party**, but the very **subject of the records** seeking access. In such a scenario, there is virtually no case or authority that would forbid the District from giving the complainant their own case file. On the contrary, failing to provide the complainant with the investigative records has been deemed a due process and fairness concern in various Title IX lawsuits. Courts have admonished schools that **hiding the ball** from involved parties can lead to liability. For example, in **Doe v. The Ohio State University**, 311 F. Supp. 3d 881 (S.D. Ohio 2018), the court noted that FERPA **does not prevent a student from accessing records in their own disciplinary proceeding**; it only restricts disclosure to others. Additionally, the **Kentucky Supreme Court in University of Kentucky v. Kernel Press** (2017) rejected a university's blanket FERPA argument and ordered the release of a Title IX investigative report (regarding faculty misconduct) to a requestor, emphasizing that records mainly documenting employee wrongdoing were not "education records" of a student entitled to FERPA protection. While the context differed, the message is clear: **FERPA and privacy laws cannot be misused to shield pertinent records from those with a right to know**. In short, both state and federal case law demonstrate that the kinds of records I seek are meant to be **accessible to the complainant**, and attempts to bar access will not hold up under legal scrutiny.

5. Obligation to Cite Specific Legal Basis for Any Redaction/Withholding: I want to reiterate the District's obligation under **Minn. Stat. § 13.03, subd. 3(f)** (and parallel principles under federal law) to provide a **specific, statute-based explanation for each item of data it withholds**. This means if any portion of the requested records is redacted or not provided, the District's response **must cite the precise provision** that justifies that action – e.g., "Minn. Stat. § 13.43, subd. 4 (if applicable)" or "34 C.F.R. § 99.____" or any other *on-point* citation. It is not acceptable to simply claim "FERPA" or "privacy" without citation, or to say information is "classified" without naming the statute. The law **forbids generic denials**. To the extent the District believes certain data cannot be released to me, I am entitled to a written certification of the denial that **quotes the specific statutory section or federal law** authorizing the refusal. If that certification does not take the expanded access to data required for Title IX key records into account, it is not a sufficient response. I will scrutinize any such citations. As an example, if the District redacts names of other students, it could cite FERPA's provisions about third-party student privacy; if it withholds a teacher's private personnel data, it should cite Minn. Stat. § 13.43. But I stress that **nothing in § 13.43 or any other law allows the District to withhold the portions of the records that are about my own child**. And since my child is the complainant (not the accused employee), **even the accused's identity is not protected from us** – FERPA's restrictions on disclosing one student's records to another do not apply in a student-to-employee complaint scenario. Regardless, I expect full compliance or a citation-by-citation explanation of any refusal.

6. Noncompliance After Dismissal of the Title IX Claim: The Title IX complaint has been dismissed by the District. At this stage, **all investigatory documents, communications, and findings should be finalized**. There is no ongoing proceeding that might justify delaying

access. In fact, **my need for these records is now urgent** because I am evaluating an **appeal of the dismissal** (which I note I am still awaiting details on the process for) **and a possible complaint to the U.S. Department of Education's Office for Civil Rights (OCR)**. It is well established that when a school's internal process is complete, the involved parties must be given access to the case record – otherwise the school is effectively insulating itself from scrutiny. **Failing to provide the complete records now would constitute noncompliance with multiple laws:** It would violate the MGDPA's access provisions, FERPA's inspection rights, and Title IX's requirements for transparency and recordkeeping. It could also be viewed as an act of **bad faith** and potential **retaliation** – obstructing a complainant's efforts to challenge the outcome by hiding the evidence. I am hopeful that the District does not intend to take such a posture. **Please understand that I will pursue all available remedies if the District does not promptly and fully comply with this request.** Under Minn. Stat. § 13.08, there are civil remedies for denying rights under the Data Practices Act. Stating that I am free pursue remedies does not relieve the District from its obligation to comply with the law. The District's honor its legal obligations as clear, and they should be honored.

7. Specific Records Requested (Original Request Maintained, with email record request expanded): For clarity, I am requesting **the same items enumerated in my original letter**, which I restate here. These items are to include **any and all data** in the District's possession on the following:

- **Complete investigative records** relating to the Title IX complaint, including but not limited to: the formal complaint document, incident reports, interview notes or summaries, investigative reports, findings or decision letters, and any evidence (documents, emails, texts, photos, video, audio, or other records) gathered or generated during the investigation. This includes both evidence **used** in making the determination and evidence collected but **deemed not relevant** or not relied upon (per 34 C.F.R. § 106.45(b)(5)(vi), both types must be available to parties). Specifically, this includes the records I have previously asserted are **Key Facts** in this investigation.
- **All communications** concerning the complaint or investigation, including internal correspondence among school or District employees/agents and external communications with any witnesses or other parties. This specifically encompasses **emails, memoranda, texts, or any other written communications** that discuss the allegations, the investigation, or the individuals involved. (As a subset, this includes communications between the Title IX Coordinator, investigators, school administrators, or others about this case.)
- **Email system log export** (<https://support.google.com/a/answer/2618876?sjid=13906215789387043576-NC#export-els>) containing all fields (<https://support.google.com/a/answer/13828463?hl=en>) for all emails sent to or from [REDACTED] or that involve key search terms (such as the names of the complainant, respondent, or myself) between the dates of 10-20-24 and 3-13-25.
- **Investigation timeline or log of activities.** If the investigators or Title IX Coordinator maintained any log, diary, or timeline of actions taken (for example, dates of interviews, dates of evidence review, meetings held, etc.), or if there exists any **chronology or**

checklist documenting the progress of the investigation, I request a copy of that record. This would include any **notes of phone calls or oral communications** memorialized by officials during the investigation. Essentially, any documentation that shows what steps were taken and when.

These categories of records are all squarely covered by the laws discussed above. They are **critical for me to review** in order to prepare an appeal of the dismissal and to support a potential OCR complaint. I want to emphasize that **time is of the essence**. If an internal appeal is available, there are likely deadlines running. Likewise, OCR typically asks for complaints to be filed within a certain time of the alleged failure. The District's prompt compliance will directly affect my ability to seek justice through those channels.

8. This is not a debate. I am not merely asking for a favor or the exercise of goodwill – I am invoking my **legal rights** under state and federal law. The statutes and regulations cited above **require** the District to act. I expect a response that reflects an understanding of these requirements. If the District's response is anything less than full disclosure of the requested records (with only those redactions absolutely required by law, each supported by citation), it will be evident that the District is not meeting its legal duty.

In summary, **Minnesota law, Title IX regulations, and FERPA all mandate that I be given complete access to the records in question.** The District is required to: (a) gather and produce all the requested data without delay; and (b) for any portion it believes it cannot produce, provide a written explanation citing the exact legal authority that permits withholding. These standards exist to ensure **transparency and accountability**, especially in sensitive matters like a [REDACTED] and discrimination investigation. Now that the investigative process at the District level has concluded, there is no lawful reason to keep these records from me – and doing so would impede my right to seek further redress.

I trust that the District will act in accordance with its legal obligations. **Please provide the records (and any explanatory cover letter for redactions, if applicable) to me at the earliest possible date.**

Thank you for your prompt attention to this matter. I hope to receive the complete set of documents without the need for additional action. Should you have any questions about the scope of my request or require clarification in order to comply, please contact me immediately – however, please be aware that **the legal requirements cited above are clear**, and I do not anticipate any ambiguity in what is being requested.

Sincerely,

[REDACTED]



Dear Mr. [REDACTED]

I am writing in response to your emails dated March 27, 2025, and April 22, 2025, May 6, 2025

1. Intent to Appeal

In your March 27 email, you stated: *"Please consider this notification of my intent to appeal - I will follow up with full details later this evening..."* Please note, the District does not act on notices of intent. Appeals must meet the procedural requirements outlined in District policy, including submission within the required timeframe. Your message was received after the **appeal deadline** had passed. As previously communicated, the District has dismissed the complaint based on the reasons provided to you, and the appeal window is closed.

2. Continued Requests for Email Log

The District has fulfilled your data request related to the requested data. You have been provided with:

- PDFs of the relevant data
- PST files containing ability to access metadata and header information
- An Excel log sent on March 14, 2025

The District has consistently communicated that it does not understand what additional information you are seeking when referring to a "full email log," and you have not identified any specific data that is missing. As explained previously, the Minnesota Government Data Practices Act does not require the District to respond to inquiries, engage in debate, or create new data. Accordingly, the District considers this request fully addressed and has no additional data responsive to it.

3. May 5th and May 6th

5/5 Formal Request for Clarification Regarding District Position on Policy 506.1 Applicability and Staff Responsibilities

Despite the submission on the District's data request form, this is not a request for existing data. The request claims educational institutions "are required to respond" to inquiries and "clarify inaccuracies or omissions in educational records." That is not a correct statement of the applicable federal regulations. 34 C.F.R. § 99.10 requires an educational institution to "respond to reasonable requests for explanations and interpretations of the records." § 99.11, which is also cited, allows educational institutions to charge fees for copies of education records, which the District has not done here.

The requests here are not reasonable requests related to education records governed by FERPA. The requests here demand the District identify specific language in policy and training materials that supports specific statements the District has made in prior correspondence. No such response is required by law.

5/6 Formal Data Request

Most of this communication is not a data request. It appears to be an AI-generated interpretation of applicable laws. To the extent portions of the seven-page legal analysis can be understood to be data requests, the District responds as follows:

- You have already been provided with educational data on your child related to your Title IX complaint. No new data has been added since your prior request. Another copy is provided with this response.
- Your written statements are included in the investigative file you previously received. No new data has been added since your prior request. Another copy is provided with this response.
- The 2020 Title IX regulations require the investigator to provide equal access to evidence to the parties during an investigation and prior to completion of the investigation report. 34 C.F.R. § 106.45(b)(5)(vi). The complaint was dismissed. Nonetheless, you have received a complete copy of the District's investigative file with redactions as described elsewhere in this communication. No new data has been added since your prior request. Another copy is provided with this response.

5/6 Request for Clarification of Weapons Policy Interpretation and Access to Underlying Decision Criteria under FERPA and Minn. Stat. § 13.04

The demands in this communication fall into three categories: requests for the District to create data, requests for public data, and requests for private data on your child. With respect to your requests for a “clear written explanation,” “Confirmation,” and a “statement,” such data does not exist and the District declines to create new data.

With respect to the public data and private data on your child, no new responsive data has been created since your prior request for this data. Nonetheless, we have attached another copy. Private educational data on other students has been redacted pursuant to Minnesota Statutes § 13.32, subd. 3 and 34 C.F.R. § 99.31. Private personnel data on employees has been redacted pursuant to Minnesota Statutes § 13.43, subd. 4. Data protected by the attorney-client privilege has been withheld and redacted pursuant to Minnesota Statutes § 13.393.

5/6 Request for Education Record Correction – HOMS Investigation Process Summary

The District will respond to this request within the timeline established by Minnesota Statutes § 13.04, subd. 4(c).

5/6 Title IX Complaint

Despite the submission on the District's data request form, this is not a request for existing data. It is also not a formal Title IX Complaint pursuant to the applicable regulations because it does not allege [REDACTED] harassment. The District has no obligation to respond to this request.

Closing

As previously stated by Dr. Thomas and Ms. Herman, the District cannot continue to expend



resources responding to ongoing attempts to debate policy, question fulfilled data requests, or reinterpret legal obligations. District staff have responded to your inquiries in a timely and thorough manner. Despite this, your communications continue to reflect a pattern of dispute rather than resolution.

Moving forward, the District will respond only to communications that are required under District policy and state law. We will only consider new data requests that are submitted properly and in accordance with our established procedures. To ensure clarity and efficiency, we encourage you to use the Data Request Form, available here: [Data Request Form](#).

If you wish to continue disputing the District's processes, conclusions, policies, or interpretations of applicable statutes, we encourage you to direct those concerns to the appropriate external entities, as the District will not engage in ongoing debate on these matters.

Sincerely,

A handwritten signature in black ink that reads "Emily N. Herman".

Emily Herman
Executive Director of Administrative Services

Redaction Index - HOMS Maltreatment / Policy 414 Combined Packet

This index identifies family-identifying private data and private allegation-category data redacted from the shareable combined packet. Red boxes mark the specific text removed; all other source text is preserved as-is. Yellow highlights and green boxes are callouts only, not redactions.

Basis: Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12 (private educational/private personal data).

Line	Page	Count	Information Redacted	Classification / Basis
10	1	2	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
12	1	1	Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
26	2	2	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
150	5	2	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
219	8	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
224	8	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
243	9	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
309	12	4	Private allegation-category data; Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
322	12	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
323	12	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
327	12	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
329	12	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
331	12	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
332	12	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
333	12	2	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.

Line	Page	Count	Information Redacted	Classification / Basis
334	12	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
388	14	1	Family surname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
411	14	1	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
412	14	3	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
444	15	3	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
463	16	4	Family surname; Parent first name; Parent initials; Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
468	16	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
478	16	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
527	19	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
561	19	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
567	19	2	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
568	19	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
571	19	1	Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
572	19	1	Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
581	19	2	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
596	20	2	Student first name; Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
597	20	1	Student first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
598	20	2	Private allegation-category data; Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
599	20	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.

Line	Page	Count	Information Redacted	Classification / Basis
622	20	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
639	20	3	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
670	21	3	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
671	21	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
684	21	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
703	22	1	Student nickname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
720	22	3	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
733	23	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
736	24	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
750	24	2	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
766	24	2	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
814	25	2	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
818	26	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
820	26	1	Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
841	27	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
921	28	3	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
923	28	1	Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
942	29	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
944	29	1	Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.

Line	Page	Count	Information Redacted	Classification / Basis
953	29	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
966	30	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
971	30	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
972	30	1	Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
993	30	3	Family surname; Parent first name; Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1008	31	1	Family surname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1027	31	1	Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1037	31	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1053	32	7	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1080	33	12	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1083	33	4	Family surname; Parent first name; Parent initials; Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1084	33	7	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1086	33	2	Parent initials; Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1087	33	10	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1088	33	4	Parent initials; Private allegation-category data; Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1090	33	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1091	33	2	Parent initials; Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1093	33	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1095	33	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.

Line	Page	Count	Information Redacted	Classification / Basis
1096	33	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1100	33	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1102	33	2	Parent initials; Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1103	33	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1106	33	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1108	33	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1110	33	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1112	33	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1114	34	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1115	34	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1116	34	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1119	34	2	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1120	34	1	Parent initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1121	34	2	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1123	34	5	Private allegation-category data; Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1124	34	2	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1133	34	1	Student initials	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1217	36	1	Personal email address	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1245	37	3	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.

Line	Page	Count	Information Redacted	Classification / Basis
1257	37	2	Family surname; Parent first name	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1259	38	1	Family surname	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.
1340	39	1	Private allegation-category data	Private identifying data withheld under Minn. Stat. section 13.32, subd. 3; Minn. Stat. section 13.02, subd. 12.