



# Board Governance Notice

FERPA mapping definitions and record-accuracy scope concern

<b>Date submitted</b>	June 18, 2026
<b>Requested response date</b>	June 18, 2026
<b>Deadline basis</b>	Minn. Stat. 13.03, subd. 2(a): requests must be received and complied with "in an appropriate and prompt manner."
<b>Sender</b>	[REDACTED]
<b>Recipient</b>	PLSAS School Board Directors and Dr. James Wagner
<b>Scope</b>	FERPA mapping definitions and record-accuracy scope concern

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.

# Board Governance Notice: Potential Undefined FERPA-Exemption Use In Data Access And Record Accuracy Decisions

Dear School Board Directors:

This is a formal board governance notice concerning a serious record-integrity and data-access concern identified during our continued audit of the District's maintained record universe. It is not a request that the Board disclose private student data, private family data, personnel data, attorney-client data, work product, or otherwise not-public data. It is a notice that the Board has now been directly informed of a potentially systemic governance issue requiring prompt routing, oversight, preservation, and corrective review.

This transmission and its attachments contain private data about me and my minor child, including private education data and personally identifiable information from education records. I do not consent to the sharing, forwarding, review, consultation, disclosure, or use of this data with or by any person or entity that is not category-mapped to a valid District-published, District-maintained FERPA exception applicable to the relevant school year and record universe.

If the District discloses or permits access without consent, please preserve and identify the maintained basis for that access, including the recipient, role, purpose, record category, applicable FERPA/MGDPA authority, annual-notice category, category mapping, legitimate educational interest, and any direct-control or redisclosure limitation relied upon.

The concern is that PLSAS staff appear to have used undefined or unmapped FERPA exemptions, including `school official`, attorney/counsel-as-school-official, and `legitimate educational interest` theories, to deny or limit lawful access to student data and/or private data, or to maintain statements that depend on those theories without identifying the District-published public definition and criteria in effect at the time.

We have already submitted a formal record-correction request addressing this issue within our family's private records: `SOMAP-RR-001`, titled **FERPA School-Official / Public-Definition Mapping Correction**. In that request, we identified 13 challenged records, statements, or record categories where the District's maintained position appears to depend on a FERPA school-official / legitimate-educational-interest theory without the necessary time-specific mapping to the public definition or criteria in effect when the access, disclosure, review, routing, withholding, redaction, or use occurred.

The reason we are bringing this directly to the Board's attention is scope and governance risk. Our child attended PLSAS in person for only 58 calendar days. Even within that unusually short attendance period and the related post-attendance request/correction record universe, we have identified 13 examples significant enough to require a formal correction request. That proportion gives us serious concern that the District may be maintaining other records containing the same inaccurate, incomplete, or misleading school-official / legitimate-educational-interest statements.

Normally, we prefer to wait until we have more information before raising a concern at the Board-governance level. To that end, we have submitted a narrow summary public data request to help determine whether, and to what degree, this concern may extend beyond our family's records:

`communications/request/2026-06-18-isd719-summary-data-ferpa-mapping-term-email-counts.pdf`

That request asks only for a simple year/term/count table for PLSAS staff-sent emails in 2024 and 2025 using selected FERPA mapping-related terms. It does not ask for individual emails, names, message IDs, subject lines, thread IDs, or private data.

However, this issue is serious enough that the Board should not wait for ordinary backlog handling before ensuring governance-level attention. The summary-data request carries a ten-day response obligation under Minn. R. 1205.0700, subpart 4. Our concern, based on the District's lack of production or disposition on existing private data requests, is that the District may be applying a generalized 90-day response framework to requests irrespective of the specific statutory obligation governing the request or category. A matter involving potentially undefined FERPA exemptions used to deny or limit access to student/private data cannot responsibly lie unaddressed for three months.

This requires Board-level governance because the suspected issue is not merely one disputed redaction or one delayed production. It concerns the District's maintained public FERPA definitions, annual-notice framework, counsel/contractor/consultant access predicates, data-access denial or limitation statements, no-log/no-disclosure-log positions, and the accuracy of records the District may be keeping or relying on across matters. If the same unmapped FERPA-exemption theory appears in other records, the impact may extend beyond our family and beyond a single request lane.

For governance purposes, the Board does not need to review or receive private student records to act. The Board should ensure that the District promptly routes this issue to an appropriate responsible authority, data-practices compliance official, superintendent-level designee, independent reviewer, or other non-implicated handler capable of reviewing the policy/notice/access predicate and record-accuracy problem without exposing private data unnecessarily.

At minimum, please ensure the District promptly preserves and reviews:

- the current and historical FERPA annual-notice language, policy language, handbook language, and public criteria the District contends defined `school official` and `legitimate educational interest` during 2024, 2025, and 2026;
- any record identifying when those definitions or criteria were approved, published, distributed, revised, or made effective;
- any record mapping counsel, outside counsel, contractors, consultants, volunteers, agents, administrators, Board-related recipients, or other non-parent recipients to a FERPA school-official / legitimate-educational-interest basis for access to education records;
- records showing whether data-access denials, redactions, no-log statements, no-disclosure-log statements, complete-production statements, or withholding statements relied on those definitions or criteria;
- records showing how `SOMAP-RR-001` is being routed, assigned, reviewed, and dispositioned;
- records showing how the June 18, 2026 summary-data request for FERPA mapping-term email counts is being routed, assigned, reviewed, and dispositioned;
- records showing whether any broader record-correction, qualification, preservation, or recipient-notification review is opened because of this issue.

Please do not treat this notice as consent to disclose private education records or private family data to the Board, counsel, consultants, contractors, or any other person without a documented lawful basis. The requested Board action is governance-level oversight of responsible-authority compliance, public-definition integrity, lawful routing, preservation, and prompt issue escalation.

Please also preserve records showing Board receipt, routing, assignment, review, and follow-up for this notice, including any record identifying the person, office, designee, counsel, administrator, independent reviewer, or other assigned handler responsible for reviewing this governance concern.

Source references:

- `SOMAP-RR-001`: **FERPA School-Official / Public-Definition Mapping Correction**, dated June 18, 2026; challenges 13 maintained records/statements/categories depending on unmapped or unsupported FERPA school-official / legitimate-educational-interest theories.

- Summary-data request PDF:

`communications/request/2026-06-18-isd719-summary-data-ferpa-mapping-term-email-counts.pdf`; sent June 18, 2026 as **Summary Data Request: FERPA Mapping-Term Email Counts**.

- Gmail send verification for the summary-data request: message `19eda3f395d9b9b1`, sent June 18, 2026 at 10:20:36; School Board auto-acknowledgment `19eda3f5dcd48e42`, received June 18, 2026 at 10:20:43, confirming all School Board Directors received the email.

- Existing District request-response pattern reflected in pending private/data-access request lanes and prior District communications applying extended production timing to multiple request categories.

Sincerely,

[REDACTED]

[REDACTED]