



# Board Governance Notice and Policy 103 Complaint

Robert Cothorn June 11 data-practices and records response

<b>Date submitted</b>	June 20, 2026
<b>Requested response date</b>	June 20, 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; schoolboard@plsas.org; Dr. James Wagner; current Responsible Authority/designee
<b>Scope</b>	Robert Cothorn June 11 data-practices and records response

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 Chair, Members of the School Board, Dr. Wagner, and current Responsible Authority / authorized designee:

I am submitting this as a Board governance notice concerning Robert Cothorn's June 11, 2026 `PLSAS Data Requests` email and the District's handling of the request/correction universe reflected in that email. I am not asking the Board to hold Mr. Cothorn personally responsible for every underlying event that occurred before he entered the District's response lane. I understand that many of the underlying Title IX, safety, assault, bullying, discipline, maltreatment, FERPA, and MGDPA issues predate his current role.

This notice is also submitted, to the extent PLSAS treats it as a complaint regarding policy-controlled conduct by a District administrator or compliance official, as a complaint under Policy 103. If the District contends another specific policy procedure governs any portion of this complaint, Policy 103 requires the District to route that portion through the specific applicable policy procedure. For any portion not governed by a more specific procedure, Policy 103 requires investigation or follow-up and a written response concerning the outcome, including any appropriate action or corrective measure, consistent with applicable privacy law.

This transmission and its attachment 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 governance concern is narrower and more current than the full underlying history: PLSAS has designated Mr. Cothorn into policy-controlled roles, including Executive Director of Administrative Services, Data Practices Compliance Official, Title IX Coordinator, and personnel-data authority. In those roles, he is now issuing maintained District records that assert finality, compliance, timelines, classifications, burden framing, legal-review framing, request-categorization framing, and negative characterizations of a parent requester. Those 2026 assertions and response decisions are independently reviewable governance issues, even where the underlying facts arose before he became involved.

The June 11 email is especially serious because it was copied to the School Board and because it did all of the following in one maintained District record:

1. linked a production described as responsive to my May 28, 2026 Kally Venteicher request;
2. stated that the District had identified more than 100 individual requests and was still working to categorize them;
3. stated that my "repeated threats to pursue legal action" and administrative complaints required the District to work with legal counsel to determine whether responsive data is civil investigative data;
4. stated that the District had explained that it would either respond or provide an expected date of response within ten days of receiving a request;
5. stated that the District would not respond to certain update requests and would respond only to communications required under District policy and state law;

6. set a generalized August 26, 2026 expected completion date for certain requests received between May 28 and June 10;
7. stated that my recurring demands for updates and responses to requests already fulfilled "suggest that the District's good faith is not reciprocated"; and
8. stated that the School Board will not be responding to my requests.

That combination is not a neutral status update. It is a maintained District characterization of my conduct, my child's records-access posture, and the District's own compliance posture. It was issued by the District's designated Data Practices Compliance Official / Executive Director of Administrative Services / Title IX Coordinator while many of the very records needed to test the District's assertions remained unmapped, undispositioned, withheld without itemized basis, or under active correction challenge.

The timing and human context matter. My child experienced multiple assaults, including assaults reported as occurring in school and in class contexts where staff were present. Our family has spent more than a year trying to obtain basic records, accurate maintained findings, source-record support, and some visible form of accountability. Against that background, it is deeply inappropriate for the District's designated data-practices and compliance official to tell a parent, in substance, that his persistence shows the District's good faith is not reciprocated, while the same email preserves or relies on a response universe that has already generated multiple correction strikes.

This is not merely a disagreement about tone. The June 11 response has already generated at least six discrete June 11-specific correction lanes or correction components in the current record universe, including:

1. the legal-review / "repeated threats to pursue legal action" / civil-investigative-data framework;
2. the timeline-commitment mismatch where older mature lanes lacked request-specific treatment;
3. the private-access classification / subject-data timing fork;
4. the good-faith and non-reciprocity characterization;
5. the create-data / duplicate / already-fulfilled mapping omission; and
6. the request-tracking mechanism / request-specific disposition problem.

Several related data-access requests also seek the maintained source basis for those same June 11 assertions. If the District believes the June 11 record is accurate and complete, the governance answer is request-specific source mapping, production/no-data/withholding dispositions, correction determinations, and appeal/hearing notices. It is not an unqualified adverse characterization of the parent.

The linked production in the June 11 email raises a separate governance concern. The problem is not that the District produced or linked records. The problem is that the production appears to rely on record aggregation or linking as a substitute for request-specific mapping. A production link does not, by itself, explain what request was searched, which systems or custodians were searched, what responsive records were included, what was excluded, what was withheld, what was determined not to exist, what legal basis was used for any exclusion, or how the linked records satisfy the precise request. Put bluntly, the District cannot use what appears to be a magic record-attaching machine as a substitute for Chapter 13, FERPA, Policy 722, Policy 515, or records-correction accountability.

The next-day follow-through problem makes this worse. The June 11 email states that the District had explained it would either respond or provide an expected date of response within ten days of receiving a request. By June 12,

the local tracker preserved a substantial May 29 access population reaching its ten-business-day outside date, along with older lanes already mature or disputed, without request-specific production, no-responsive-data statements, statutory withholding bases, duplicate/fulfilled source locators, or meaningful expected-date treatment. The generalized August 26 date did not facially cure the older lanes and did not supply request-specific dispositions. A Board should not allow the District's compliance official to maintain a broad good-faith / non-reciprocity accusation while the District fails to follow through on the very response-timing framework stated in the same email.

The Board's own policies make this a governance issue rather than a personality dispute.

Policy 722 identifies the Data Practices Compliance Official as the designated employee to whom people may direct problems obtaining access to data or other data-practices problems, and it identifies Rob Cothorn as that official. Policy 722 also requires written access/no-access/no-data handling, specific legal bases for denials, data-subject access treatment, correction rights, and annual data-access procedures.

Policy 406 makes important personnel-data fields public, including employee name, job title, job description, education/training background, previous work experience, and the existence/status of complaints. It also designates the Executive Director of Administrative Services as the authority responsible for personnel data and states that this authority or designee serves as the data-practices compliance official. The District therefore cannot hide the accountability skeleton behind "personnel data."

Policy 403 provides an employee-accountability lane for violations of school laws and rules, failure to follow district policies, substandard performance, unprofessional conduct, neglect of duty, and deliberate or serious violations of the rights of students, parents, or other persons in the school community.

Policy 515 governs student-record maintenance, safety-related student-record purposes, and parent access to educational records. Policy 522 and Policy 528 place the Title IX compliance-coordination role in Mr. Cothorn's office and require procedurally reliable records, notices, access, findings, determinations, and appeal information for Title IX matters. Policy 506 and Policy 506.1 require complete and accurate discipline records, bullying/discipline complaint handling, written determinations, protection/remedial steps, and training/coaching/accountability where policies were not implemented appropriately. Policy 103 requires specific complaint-policy routing when a specific complaint procedure applies, and otherwise requires written complaint outcome/corrective-action response consistent with privacy law.

I am asking the Board and the District to treat this as a governance and policy-enforcement issue:

1. Confirm who is the current Responsible Authority, acting Responsible Authority, authorized designee, Data Practices Compliance Official, personnel-data authority, and Title IX Coordinator for the pending request and correction universe.
2. Identify the policy lane used to process this notice and complaint, including whether it is treated under Policy 103, routed to another specific policy procedure under Policy 103, or split between specific-policy procedures and the Policy 103 fallback lane.
3. Identify the administrator, investigator, reviewer, or decisionmaker assigned to investigate or follow up on this complaint and issue the written outcome/corrective-action response required by Policy 103 or any more specific procedure.
4. Confirm whether Robert Cothorn's June 11 email was reviewed, approved, authorized, or adopted by the Responsible Authority, Board Chair/designee, legal counsel, superintendent, or another administrator before or

after it was sent.

5. Preserve and review the source records used to create the June 11 statements, including any request tracker, source map, production map, no-data map, withholding map, duplicate/fulfilled map, legal-review record, civil-investigative-data record, counsel-access record, and Board-routing record.
6. Identify whether the Board agrees that the June 11 "good faith is not reciprocated" characterization should remain a maintained District record without request-specific source support and without my statement of disagreement attached.
7. Identify whether the Board agrees that the School Board "will not be responding" to my requests, including Board-addressed child-safety, Policy 414, Title IX, data-practices, record-correction, and governance notices.
8. Require the District to map the June 11 production link to the May 28 request with enough specificity to show what was searched, what was produced, what was excluded, what was withheld, what did not exist, and what legal basis applied.
9. Require the District to either correct or qualify the June 11 maintained record, or identify the existing source records supporting the challenged statements.
10. Require the District to identify what corrective action, coaching, training, supervision, reassignment, independent review, or other accountability measure will be used if the June 11 record cannot be supported.

I am not asking the Board to decide every underlying FERPA, MGDPA, Title IX, bullying, discipline, or maltreatment issue in this notice. I am asking the Board to stop treating the response channel as if it is outside governance oversight. PLSAS placed Mr. Cothorn into policy-controlled roles. When those roles are used to issue broad finality, burden, legal-review, nonresponse, and adverse-good-faith statements about a parent seeking records after serious harm to a child, the Board has a duty to ensure the statements are accurate, source-supported, lawful, and humane.

Please preserve this notice and route it to the full Board, Dr. Wagner, the current Responsible Authority or authorized designee, and any governance/legal-review channel responsible for oversight of Data Practices, FERPA, Title IX, personnel-data authority, Board communications, and Policy 103 complaints. Please also clarify who is currently acting as the District's Responsible Authority or authorized designee for pending MGDPA/FERPA access and correction matters during the superintendent transition.

Respectfully,

[REDACTED]

[REDACTED]