

Redacted Survey Responses: Education

These survey responses have been redacted to exclude personally identifying information.

Responses about all education goals

- Methods of assessment need to include if a student is failing an assessment, is the skill the thing being tested or is an assumption of the assessment being tested instead. Also, students should be able to communicate their knowledge in multiple modalities, such as verbally or written or via video/projects. Also- what is fewer? In what way? These goals need more specificity. I would also add that disabled students, as a metric, should have a qualitative survey on if they feel they belong, how they feel they are being treated, and what they like and dislike about their environment. This should be done with the teacher potentially taking a prep day and a counselor or supervisor doing the assessment on a 1:1 basis
- These are inspiring statements and are true - we all want what is stated - however - they are extra-ordinarily broad and non-specific. More students in integrated classrooms - is a great outcome - but if it isn't supported with the necessary supports the educators need to make it successful it is chaos - harming all. There needs to be foundational, fundamental change - not driven by metrics but driven by behavior/priorities and laws that create the right environments.
- I would like to see a program created by the state in conjunction with ECSE in districts to hire teachers to train teachers in ECE about working with children with IEPs. This training should be mandatory and part of it should be done outside of the classroom so teachers can fully discuss topics and get the most from the curriculum. Then, the ECSE teachers can follow up with classroom observations and coaching. The program should be framed in a positive, supportive way so that ECE teachers are getting support and yet demonstrated respect for their positions.
- The education goals, as written, are too soft and overly reliant on expanding systems, training, and administrative processes. This approach risks continued cost overruns and does not guarantee improved outcomes for students with disabilities. The state should shift away from building larger, more complex systems and instead focus on enforcement, prevention, and efficiency. Existing standards and requirements are already in place in many areas; the issue is inconsistent implementation and lack of accountability when systems fail. First, prioritize enforcement of existing laws and IEP requirements rather than layering on additional training and coordination structures. When schools do not meet their obligations, there should be clear, timely consequences and corrective actions. Second, focus on prevention by ensuring proper

placement, communication access, and early intervention. Many of the challenges identified in these goals-discipline, restrictive procedures, and disengagement-are preventable when students are in environments that match their needs from the start. Third, streamline systems to reduce administrative burden on educators. Excessive training, tracking, and reporting requirements take time and resources away from instruction and direct student support. Fourth, invest in what already works. Minnesota has established, effective models such as the Minnesota State Academies and specialized charter schools like Metro Deaf School, Spero Academy, and Lionsgate Academy. These models should be expanded and prioritized rather than building new layers of generalized programming. In summary, the direction should be clear: do more with less by enforcing what already exists, preventing problems before they escalate, and focusing resources on proven, efficient educational models rather than expanding bureaucracy.

- The goals for this Olmstead Plan are simply following the natural trajectory of improvement and are not aspirational. The mission of the Olmstead Plan is supposed to provide actual growth and improvement in the lives of PWD and this plan misses the mark completely.
- I think the goals should stay with goals that are directly measuring impacts to people. Process improvement should happen and be a strategy but not included as a goal.
- Teachers/paras need to be compensated for their extra training
- Overall I feel these goals are very short sighted. I think the % given are almost insulting to our state, state agencies and people with disabilities. While I understand that we have to have obtainable goals-it appears these are based on "status quo", if we keep everything as is, these goals will be reached. I think that MN needs to have lofty goals. I also really think that we can't put a blanket goal on the state. Looking regionally. Right now this seems like a metro based plan-maybe regionally have goal percentages? The very small % in the plan could easily be reached in a metro type area leaving greater mn without any change.
- Educational system is awfully lacking and supporting brown and black children in a culture and linguistically appropriate way. We have parents that are severely under informed or misinformed due to the lack of death standing what family that are new to this country face. Many children end up falling between the cracks. The weight education system is set up right now is in such a way that a future that is successful not an ambition that them have for the children in their care.
- The programs, certificates and higher learning have to be able to be adaptable to a students abilities and adaptable to the specific students needs. For instance the CNA program is heavily regulated by the State Approved curriculum, which must be completed under specific timelines, and tested without proper accomandations for neuro diverse students. Individuals may very well be capable of performing the job, but the inflexible cirricula and testing requirements shut neuro diverse students out of the field. There are not programs specifically designed for students with disabilities to succeed. Developing goals and pushing "inclusion" does nothing to address the needs of the students to be successful. Developing different ways to test a persons

ability, to measure knowledge and to encourage development of skills would be a much better use of time and resources.

- I am not optimistic. I think these are the wrong measurable outcomes, the wrong conversations, and they taking place with the wrong people at the wrong time.
- Missing integration for school activities. Exm: sensory sensitivity for prom, home coming, lunches, etc
- I would give these goals a D or D-.
- Maintaining the status quo is NOT a goal.
- Across the board, these education goals suffer from the “knowledge deficit fallacy.” MDE and partner agencies assume that segregation, disproportionate discipline, and maltreatment occur because teachers, principals, and ECE staff simply lack awareness, training, or “best practice” frameworks. This is a fundamental misdiagnosis of the problem. Schools use exclusionary discipline, police presence, restrictive procedures, and inappropriate segregation as capacity-management tools because the system is starved of the structural and financial resources required to support the placement that is actually best for the disabled child. Furthermore, MDE must stop using “integration” into mainstream public schools as a binary gold standard. For many Deaf, DeafBlind, and hard of hearing students, true access requires linguistically and culturally immersive environments (such as Deaf schools) which MDE's metrics often incorrectly penalize as “segregated.” The goal must be fully resourcing the placement where the student thrives, rather than forcing proximity to non-disabled peers at the expense of language and culture. Finally, the data goals heavily rely on administrative quotas (e.g., identifying 17 districts) and tracking the compliance of traumatized students (e.g., youth exiting the DOC), rather than measuring the system's failure to provide frictionless supports. Until these goals shift from funding “awareness trainings” to mandating hard economic capacity-building, banning restrictive procedures, and holding districts financially accountable for their reliance on inappropriate exclusion, this plan merely administrates the status quo.
- Goal 3: I like this goal because I have seen so many people get expended and expelled. It's great because it doesn't hold students accountable. Goal 5: This goal is fine but could use some work Data Goal 1: We should have more improvement with this goal to be integrated and released into the community and have greater choice where they should be released.
- Disability Systems Change Council (p11 under Measurable goals and strategies) -- there is NOTHING on the home and community based services that make the rest even possible. Under “tracking progress” (p14) they talk about percentages of increase or decrease. Single digits? Then the claim: “This target reflects changes that DCYF can realistically make.” “Discipline” (p18) means suspension longer than 10 days, or expulsion...but not reducing or eliminating restraint. Later on in the document (p22), they refer to “restrictive procedures” -- but do not specifically address restraint. After reading this far, (redacted) is the Disability Systems Change Council for exactly? Looks like the OIO already decided on everything. Another charade like the WRAC committee, true to (redacted) past behavior. Abuse & Neglect research and goals pertain ONLY to facilities, not home environments and not group homes. NO mention of fortifying

Adult Protection to become useful at all and NO mention of the catch-22 in Child Protection when families are not given sufficient funding for the HCBS supports. MDH will “Continue to train health care and other service providers about identifying and reporting abuse and neglect” -- which is absolutely stupid when NOTHING USEFUL ACTUALLY COMES OF IT. The trainers and trainees get more money, but the people get nothing. Housing Universal Design standards (p32) says nothing about those with Chemical Sensitivities who are homeless bc of construction toxins, shared ductwork and previous tenancies destroying the air quality with their substances. Also loans for “improvements” if you already own, but no loan opportunities for NEW home owners. They want us to rent and be under the thumb of landlords. Transportation (start p 34) NO Rideshare access. More unnecessary research for “potential approaches.” That money could be spent on ACTUAL RIDES. A whole bunch of “MnDOT is working to confirm targets and baseline data.” Why is MNDOT doing it themselves and not surveying the people to see what's needed? And then cost of transportation will go up under this plan with “updated rates would also more closely match the actual cost of providing services.” Sounds like the state will not be subsidizing, which means a greater disability tax gap for us to foot. Anoka Metro Regional Treatment Center (AMRTC) p 40 -- NO mention of home and community based supports being a solution. A mention of “Increase access to peer support across all service areas” ...are they going to pay people with disabilities or are they expecting us to do more volunteer work? Crisis service (p48): “DHS recommends that in the future, this goal counts voluntary residential treatment as “staying in community.” They are trying to pawn off an idea that is not, in fact, “in the community.” Community Employment (p50) - “If someone makes \$600 or more per month, they are counted as having CIE. If someone makes \$599 or less per month, they are counted as having non-competitive employment.” It says NOTHING about the hourly wage or how many hours. This is a stupid way to assess competitive employment. Competitive employment is GETTING A JOB AGAINST AN ABLED PERSON -- COMPETEING WITH AN ABLED PERSON FOR THE SAME JOB. They are passing off a definition that is not correct. They are also talking about allowing “subminium wages” after all the advocacy and new laws. “DHS is working on getting data that will show the number of people who have CIE” (p51) means that we're spending more money on a researcher instead of actually holding these job brokers/coordinators accountable for the already high rates they get. Councils and Advisory Boards (p61): “Minnesota is in the process of redesigning advisory councils to come into compliance with federal regulation (Access Rule). It is reforming the Medicaid Advisory Council and establishing an Interested Party Advisory Council. -- all these councils to pretend like they are engaging stakeholders. It's a ruse. Mechanical Restraints (p62) -- NOT physical restraint, NOT chemical restraint. ONLY “mechanical.” Restraint should be addressed without an adjective/qualifier. Segregated settings to integrated settings (p65) -- again no mention of home settings or group home settings as being “segregated.” If a person can't leave their home or group home in a self-directed fashion, it's segregated. Lots of consultants are being paid! (p66) to do more nothing useful. This money could be used to fund proper levels of care in HCBS settings instead of consultants. Community Engagement -- Telling us what we want to

hear, but likely not to deliver bc of history of leadership. "Community engagement is accountable when there is full transparency with participants (p68) , "During engagement, facilitation must fit the needs of the community...We prioritize leading with a spirit of co-creation and honoring the community's feedback." (p69) -- We are being fed a line of BS right now. I personally won't believe it until (redacted) no longer serves in or for a state agency and until the program designs actually support the people. "Community engagement is core to OIO's work" (p70) and yet, their procedures are exclusive, the agency representatives don't follow through meaningfully with solutions. they say "surveys will focus on quality of life for people in segregated settings...and that doesn't include everyone who is segregated. Agency Connect (p71) "OIO will track state agencies' timeliness and responsiveness" -- but not the quality of the responses. Remove (redacted). Her role on the OIO is a HUGE CONFLICT OF INTEREST to oversee this plan having been the former director of DHS Aging & Disability Services. She threw us under the bus many times during her time at DHS, namely with the Waiver Reimagine's MnChoices Assessment and Budget Methodologies. More: - No mention of Waiver Reimagine even though HSRI's own data projects people facing average \$34,644 budget cuts and many will face 50-80% reductions concentrated in home and family living settings. - An independent legal analysis already in the Minnesota Senate record (O'Meara Wagner, P.A., SF 4512, April 12, 2026) written by the same attorney whose prior litigation CREATED Minnesota's Olmstead Plan identifies Waiver Reimagine as illegal under the ADA, Olmstead, and federal Medicaid law. The 2026 plan does not mention it. - Minnesota is misclassifying 5-6 person congregate settings that meet the DOJ's definition of mini-institutions as participants' "own home." Every community integration statistic the state reports is built on miscoded data and a definition that is wrong. - No budget adequacy standard and nothing requiring that waiver budgets actually be sufficient to sustain community living. - No home care staffing or nursing goals even though nursing and DSP vacancies represent 10-15% of ALL job openings in the state. You cannot access employment, housing, or community life if there is no one to help you perform ADLs in the morning. MN leads the nation in nursing homecare shortages. Goals without access consideration are unattainable. -The public comment process itself routes feedback through a filtered anonymous Formstack survey with text boxes and checkboxes. Also, the Olmstead Plan needs to clearly define what "supports" means. We demanding tangible supports: direct and indirect, formal and informal. Supports should be meaningful to the individual and their family if they choose. Undefined terms create enforcement gaps and leave too much room for narrow interpretation and cost-shifting onto families.

- Good start
- No

Education Goal 1

- We must remember that successful inclusion isn't just about ensuring that students are with their non-disabled peers, it means that they can also successfully participate in the learning,

instruction and activities in meaningful ways. Without adequate staffing models and intentional support for educators to make the necessary accommodations and modifications, meaningful inclusion is not possible.

- movement from LRE 2 into LRE 1 is most likely what will happen - how do you encourage and support movement from LRE 3 to LRE 1 or 2?
- We need more support staff and well trained paraprofessionals to support students in inclusive settings.
- Though in some cases the general ed classroom is ideal for a student with developmental delays sometimes, it is not a successful integration and puts the classroom teacher in a stressful and challenging position. The expectations put on a classroom teacher to accommodate all of the student needs is not realistic in large classrooms with many students. Sometimes student behaviors are overly impactful and negatively affect the learning of all the other students. For this reason it is vital that the students have all of the support they need to be successful in a gen ed class.
- The current goal is backwards and relies on an outdated placement metric that does not reflect educational quality, functional access, or real equity for students with disabilities. Measuring success by increasing the percentage of students in “the most integrated setting” assumes that proximity equals access. For Deaf, DeafBlind, hard of hearing, and blind/visually impaired students, that assumption is incorrect and often harmful. Integration without full communication access and disability-specific instruction results in reduced incidental learning, limited language access, and unequal educational outcomes. This goal should be replaced, not adjusted. Minnesota already demonstrates stronger models that should be recognized and expanded rather than treated as exceptions. The Minnesota State Academies (Minnesota State Academies) provide fully accessible, language-rich educational environments where students can actually access instruction and peer communication. Similarly, disability-specific charter and specialized schools already operating in Minnesota show what effective, access-centered education looks like in practice. These include Metro Deaf School (Metro Deaf School), Spero Academy (Spero Academy), and Lionsgate Academy (Lionsgate Academy). These schools reflect a model where instruction is designed around access and learning needs, not forced placement ratios. The policy direction should shift away from “time spent in integrated settings” and toward measurable educational outcomes: literacy, language acquisition (including ASL where applicable), graduation readiness, and post-secondary transition success, all disaggregated by disability type. Any placement in a general education setting must require documented proof of full communication access and appropriate specialized instruction. Without that, integration is a label, not an educational reality. In short, this goal is structurally backwards because it prioritizes placement over access. A modern education system must prioritize language access, specialized instruction, and measurable outcomes-not arbitrary integration percentages.
- is this what students and parents want?? A policy may look good on paper but not in practice.
- Incorporate counties in the education process for a holistic support system with home and community supports for long term supports

- Make sure that the school actually understands that a non-verbal child with autism is not what early IQ tests show - they are not a good measure. Broaden parent / guardian involvement and education as much as possible.
- I think Minnesota is doing a woefully inadequate job of meeting this goal. Many general education teachers feel very unprepared to support students with disabilities in their classroom. They receive very little training, and even less support. I wish all teachers received training from people with disabilities as part of their teacher training, and teachers already in the field had access to professional development BY people with disabilities about how to support students with disabilities. We have a tremendous community of self-advocates here in Minnesota. Their expertise and experience is a great resource that is being underutilized.
- 1. School principals need training, AND support from district administration. 2. Train general education teachers, not sure SPED teachers. 3. Support paraprofessionals in attending and participating in IEP meetings, and in having regular and on-going communication with the student's family. 4. Use evidence-based best practices to identify and implement inclusivity trainings. Special Olympics Unified programming is the antithesis of inclusion. 5. Again, more support at the district level is crucial. 100% of students are mandated to receive educational services in the Least Restrictive Setting (LRE). Why would we settle for 65.3%? That is saying that roughly 35% of students are incapable of learning in an inclusive environment. Current data clearly indicates that number is ridiculously high, as most student can be successful in an inclusive environment with the appropriate supports and services in place. MDE needs serious reform! As a former member of the Special Education Advisory Panel (SEAP) at MDE, I can attest to the fact that this is yet another broken state system. SEAP is a tokenistic means to check a box. There is no collaboration between MDE and persons with lived experience and their families. MDE continues to design and implement programs and policies FOR stakeholders, rather than WITH stakeholders. There is complete lack of respect and appreciation for students with disabilities and their families.
- Special ed classrooms are isolating and demeaning. The kids don't learn a thing. Mine was in a level 4 lock down for 2 years but she did NOT belong there. 2 years wasted watching movies. 2 years of being locked in closets, 2 years of enduring unnecessary body searches. She wasn't even allowed to change her sanitary pad at school because the school was afraid of drugs. My kid has ZERO history of drug use, yet policies designed for the managing youth with juvenile criminal justice background applied to all kids. Thank god we found a charter school to take our kid! Our home district would have locked her up all day instead of dealing with bullies and teaching kids who were prey. No my kid has 4 years of college, 2 AA degrees and a full time job.
- The proposed strategies rely entirely on the “knowledge deficit fallacy”-the assumption that segregation happens because school staff simply lack the training, awareness, or “best practices” to include disabled students. This is a severe misdiagnosis. Segregation in schools is largely a capacity management tool used by under-resourced systems. Training a paraprofessional does not solve the problem if a district cannot hire or retain them due to unlivable wages. Providing “awareness” does not change the structural reality of massive

caseloads. To create actual systemic change, MDE's strategies must shift from staff training to structural capacity building. I suggest the following action steps: 1. Economic Restructuring of the Paraprofessional Workforce: Replace "training paraprofessionals" with systemic action steps to secure livable wages, benefits, and full-time status for education support professionals. MDE cannot mandate integrated classrooms without stabilizing the workforce required to sustain them. The current staffing crisis is an economic failure, not a training failure. 2. Mandate and Fund Co-Teaching and Caseload Caps: Training a teacher to "tailor instruction" in a general education classroom of 35 students is a setup for systemic failure. True integration requires structural support, not just physical proximity. Action steps must focus on adjusting funding formulas to support robust co-teaching models (pairing general education and special education teachers) and enforcing hard caps on class sizes. 3. Dismantle "Earned Inclusion" Pathways: Schools frequently default to segregated settings, requiring disabled students to "prove" their behavioral or academic readiness before being granted access to the general education classroom. MDE must create actionable, enforceable policies that prohibit districts from using segregation as a behavioral management tool, establishing that integration is a baseline civil right, not a reward for compliance.

- I believe there are adults like myself who would love to pursue graduate or PhD degrees. This segment of the population is 100% ignored. Those programs are super expensive and at low incomes can never be affordable. I myself have been trying to get a graduate degree for years. I can get accepted but since those programs are very expensive I can never attend. This small group is easy to ignore but think of all the contributions these people could have in disability situations but also in personal growth. There is everything to gain in keeping minds learning and engaged in higher levels of thinking!
- Qualitative research :Listen to what students and their parent(s) want and need for student be successful in an integrated setting and implement their recommendation
- these trainings and education plans should be delivered by people with lived experience to demonstrate actual inclusion in action.
- Pay the paraprofessionals a good wage. These hard working people make the difference in integrating kids to regular classrooms.
- Education Goal 1: Mostly integrated. Making referrals and placements without the school district forcing them one way or another

Education Goal 2

- Making schoolwide family engagement initiatives inclusive of families of students with disabilities - when students with disabilities are known by their peers, schoolwide family engagement events are more likely to feel inclusive to students with disabilities and their families
- Integrating families in the school system is ideal and very valuable.

- This goal is overbuilt on process measures and underbuilt on educational substance. “Facilitating engagement” is a weak proxy outcome and risks becoming another compliance exercise that does not improve actual student learning or accountability. The primary responsibility of schools is not survey performance or engagement reporting-it is effective instruction and measurable student learning. Family engagement matters, but it should be a byproduct of transparent, accessible education delivery, not a standalone bureaucratic system layered on top of instruction. A more effective approach would streamline this goal and refocus it on core functions: First, prioritize instructional transparency over engagement metrics. Families should have clear, timely access to what their child is learning, how progress is measured, and whether the student is meeting academic and communication benchmarks. That is more meaningful than reported “engagement satisfaction.” Second, reduce administrative layers by simplifying communication pathways between schools and families. Instead of multiple coordinators and parallel engagement systems, schools should be required to provide direct, accessible communication channels tied to the student's actual educational plan and progress. Third, recognize that meaningful engagement is not universal in form. For many students with disabilities, engagement is only effective when instruction itself is accessible. If instruction is not accessible, engagement initiatives are largely performative. Fourth, Minnesota already has strong models of specialized education that inherently improve family alignment because instruction is clear, structured, and access-centered. This includes disability-specific charter schools such as Metro Deaf School, Spero Academy, and Lionsgate Academy, as well as the Minnesota State Academies. These models should be elevated and expanded as examples of effective education delivery, rather than treated as peripheral options. Finally, the state should avoid over-reliance on survey-based success metrics. A 72% satisfaction target does not guarantee improved instruction, equity, or outcomes. Accountability should be based on student achievement, literacy, language access, and transition success-not perceived engagement with school systems. In short, this goal is overly procedural. The focus should return to the basics: accessible instruction, clear accountability for learning outcomes, and recognition of successful specialized education models that already exist in Minnesota.
- Increase support staff in schools and community centers.
- This is a measure of process and includes subjective data. doesn't seem to be appropriate to be in the Plan as a goal but should be included as best practice or a strategy.
- Focus on a student centered approach building off positives
- Unclear goal - by “facilitate engagement” are you referring to notices of evaluations, development of the IEPs, information and feedback from those employees such as OT/Speech/PT and teachers ? Or is it making those personnel more accessible where conferences and feedback are scheduled when the parents/guardians are available to participate. These meetings are long and taking off 2-4 hours 3 to 4 times per year is very difficult for some.

- The goal should not simply be to “facilitate engagement.” It should be to have a collaborative relationship that ensures best outcomes for students. I find myself wondering when is the last time anyone asked families how they felt about their relationship with the school?
- First, the family engagement survey is a joke. It is designed elicit desired responses. Surveys ARE NOT an effective means to gather information from families who do not speak English as a first language, and other underserved communities. Schools should invest in their family-led Special Education Advisory Councils to help them better engage/partner with families. Family Engagement Coordinators MUST be individuals with lived experience, AND training in family leadership.
- Family engagement needs to be better than a phone call to suspend a kid for crying after being beaten up by a bully. There will be no improvement using status quo tools.
- The proposed strategies treat “family engagement” as a communication and public relations issue rather than acknowledging the structural power imbalance inherent in the special education system. Improving outreach, translating documents, and providing multiple survey formats are basic accessibility minimums, not systemic strategies. Families do not disengage because they lack translated flyers; they disengage because the IEP process is frequently adversarial, legally combative, and designed to protect district resources rather than meet student needs. To create genuine family engagement, MDE must shift its strategies from “cultural responsiveness training” to dismantling administrative friction and structural power imbalances. I suggest the following strategies: 1. Track the Asymmetry of Legal Representation and Advocacy: Engagement data must track power dynamics. MDE should measure the disparities in which families must resort to hiring private advocates, attorneys, or independent evaluators to secure FAPE (Free Appropriate Public Education). If high engagement is only achieved by families with the financial capital to fight the district, the system is failing. 2. Fund Independent, Non-District Navigators: Regional “Family Engagement Coordinators” employed by or aligned with the district still represent the district's financial interests. MDE must fund entirely independent, state-level systemic navigators or peer-advocates who work exclusively on behalf of the family to decode administrative jargon and enforce compliance at the IEP table, specifically for marginalized communities. 3. Shift the Burden of Proof for Denials: Currently, the burden of administrative friction is placed entirely on the family to prove their child needs a service or accommodation. A systemic strategy for engagement would be mandating that districts provide exhaustive, independent, data-driven justifications when denying services requested by a family, shifting the bureaucratic labor back onto the institution rather than exhausting the parents.
- Use qualitative interviews not surveys and implement info into strategies
- Family engagement needs to include parents with disabilities that have children with IEPs. there is minimal requirements or support offered to make the IEP process accessible.
- Have parent mentors for other parents.
- Education Goal 2: Retaliation is not accounted for and I am not satisfied with goal number 2. Dissatisfied with this goal

Education Goal 3

- Increase developmentally appropriate practices in grades K-3 that includes play and social emotional learning.
- ensure tier 1 supports are accessible and meaningful to all students with disabilities - students with disabilities shouldn't just get Tier 2 or 3 without Tier 1
- A key missing strategy in this goal is addressing structural barriers that limit school mobility for students with disabilities. While “reducing suspensions and expulsions” focuses on behavior management within current placements, it does not address whether students are appropriately placed in the first place. Students with IEPs should have meaningful and timely access to alternative educational settings, including open enrollment options and disability-specific schools, when their current placement is not meeting their learning, communication, or behavioral support needs. In practice, barriers such as delayed approvals, transportation constraints, and administrative resistance prevent families from accessing environments that may be a better match for the student. Improving access to appropriate placement options is a prevention strategy for disciplinary outcomes. Many suspensions and expulsions are the result of system-placement mismatch rather than student behavior alone. When students are placed in environments that align with their communication needs, learning style, and disability profile, disciplinary incidents decrease significantly. To strengthen this goal, the state should: Ensure that open enrollment processes explicitly accommodate students with IEPs without additional administrative barriers or delays. Require that placement decisions prioritize functional fit, including communication access and instructional compatibility, not just geographic assignment. Strengthen awareness and access to specialized educational environments, including Minnesota State Academies and disability-specific charter schools such as Metro Deaf School, Spero Academy, and Lionsgate Academy, as viable and appropriate options-not last-resort placements. Track whether disciplinary disproportionality is linked to placement mismatch and incorporate corrective action that includes facilitating transfer to more appropriate educational settings when needed. In short, reducing suspensions and expulsions requires more than behavior interventions. It requires ensuring students are actually able to attend the school setting that best matches their needs, without unnecessary administrative or structural barriers.
- The self reviews and action plans will not be helpful. It is putting more work onto the support staff who should be able to focus on how to support the students and teachers.
- The way the goal is written it is not clear if this is a goal to lower the %age, maintain it, or increase it.
- Work with counties to provide a holistic approach to behavior, use positive behavior support
- The goal should be zero schools are disproportionately disciplining students with disabilities. PBIS is controversial in the disability community. I am not sure the strategies listed are the answer. There are other models which are considered much more affirming. Again, engaging

with the community of disabled for adults about what strategies they would recommend would be my priority.

- The thing about PBIS/PBS is that yeah, you can support positive behavior without doing a bunch of ABA/behaviorist crap to kids, but in practice it's all a bunch of ABA token boards and operationalizing relationships to the point kids who are already at risk of exclusionary discipline will not trust you at all. Like, a kid who has been so disruptive they are facing suspension/expulsion is a kid who a) almost certainly has serious trauma in their history and b) is not getting enough support from adults and other people (including older but still <18 kids) in their life. And the solution to that is ... manualize and operationalize interactions further, so the only time an adult tells them "good job" or shows any positive attention whatsoever is when they're "earning their tokens"? If you want to reach kids who are on the verge of suspension/expulsion, you have to treat them as real human beings whose problems and issues are *real*, not just excuses for bad behavior. You have to make sure those kids have adults in their lives they can trust and will go to for help/advice before they do something harmful. Forcing those kids into EBD classrooms where everything, including positive attention, is manualized to the point of parody isn't doing that.
- The problem with PBIS is that it is not being implemented at the individual level.
- No kids should be expelled from school!
- The measurable goal as written is fundamentally flawed. Setting a target based on the percentage of districts identified as disproportionately disciplining students is merely a quota for MDE's internal compliance paperwork. It incentivizes the state to under-identify problematic districts to meet their metric. The goal must measure the actual reduction in exclusionary discipline incidents experienced by disabled students, not the state's identification rate of schools. Furthermore, the strategies rely on PBIS, training, and "corrective action plans" (which are often just more administrative churn). Schools use suspensions and expulsions as capacity-management tools. Until the structural reliance on exclusionary discipline and police presence in schools is dismantled, training will not change the data. I suggest the following strategies: 1. Track and Regulate "Informal" Removals: Official suspension data is often artificially lowered by schools utilizing "informal" removals-frequently calling parents in the middle of the day to pick up their disabled child, or placing students in continuous "in-school suspension" holding rooms. MDE must create strict enforcement mechanisms to track and penalize these off-the-books exclusionary practices, which bypass due process and artificially inflate the district's success metrics. 2. Decouple Discipline from Law Enforcement (SROs): Expanding PBIS and behavioral health is irrelevant if a district's first response to a behavioral crisis is law enforcement. MDE must create action steps to structurally decouple school discipline from School Resource Officers (SROs). Disability-related behavioral escalations must be managed by clinical or behavioral health professionals, not criminalized by armed police officers stationed in the building. 3. Implement Financial Penalties for Disproportionate Harm: "Proactive support" and "corrective action plans" lack the teeth required to force systemic change. If a district relies on the segregation, suspension, or expulsion of disabled students as a

classroom management tool, MDE must enforce immediate financial and administrative penalties, diverting district funding toward independent, third-party behavioral intervention teams.

- Qualitative surveys with students disciplined on what would have worked better for them and implement their strategies
- If you are attempting to do this in a culturally responsive way, i suggest looking into how the neurodiversity community feels about PBIS. this is not a widely accepted or supported form of behavioralism. the goal should not be to correct student behavior rather to teach schools to treat behavior as a commuication function and find the cause of the behavior and support the unmet need. Additionally to move forward with this goal ina. culturally competent way this will require an intersectional lens that willingly looks at disability, lgbtqia, and other non-conforming cultural aspects to be truly competent
- No
- Education Goal 3: everything is fine with this goal
- Goal 3: I like this goal because I have seen so many people get expended and expelled. It's great because it doesn't hold students accountable.

Education Goal 4

- One needs to remember that DCYF is not the only entity responsible for supporting the needs of early childhood (Early intervention and Early Childhood Special Education are still firmly grounded in the work of MDE). Supporting the needs of children with special education needs across early care and education landscape is critical for supporting our workforce and successfully supporting early intervention and inclusion opportunities.
- This is a very important goal. Having a school culture and strategies for handling student behaviors is important. Teachers and paras need additional training to work successfully with students who have special needs. Their education background did not likely include this training.
- The current approach is overly complex, costly, and heavily focused on training systems that have not demonstrated consistent impact. Expanding layers of training, tracking, and coordination increases administrative burden without addressing the core issue: ensuring children are in educational environments that actually match their needs. This goal should be simplified and refocused on system design and accountability, not expanded training infrastructure. First, reduce reliance on continuous training as the primary solution. Training does not replace proper placement, appropriate staffing models, or functional program design. Instead, shift accountability to preparation at the front end by requiring colleges and universities to update educator preparation programs so graduates enter the workforce with baseline competency in disability support, communication access, and classroom management. Second, prioritize placement flexibility as a primary strategy. Children with disabilities should be able to enroll in educational settings that best match their needs without unnecessary barriers.

This includes access to disability-specific schools and programs where staff are already equipped by design, rather than requiring generalist staff to be continuously retrained. Minnesota already has effective models that should be expanded and promoted, including the Minnesota State Academies, Metro Deaf School, Spero Academy, and Lionsgate Academy. These environments reduce the need for extensive ongoing staff training because they are structurally aligned to student needs. Third, shift from training metrics to enforcement of existing standards. If staff are not meeting expectations in supporting children with disabilities, there should be clear accountability measures tied to performance-not additional optional training opportunities. Fourth, streamline systems. Eliminate duplicative training tracking, overlapping frameworks, and excessive coordination layers. Focus on practical supports that directly impact the classroom, not administrative infrastructure. In short, this goal should move away from expanding training systems and toward simplifying expectations: better upfront preparation, easier access to appropriate placements, and clear accountability for delivering effective support.

- Again - this is a process goal - this should be moved to be a best practice or strategy - there is not a direct outcome for people with disabilities.
- The measurable goal seems woefully inadequate. Only 40% will report they need additional support? Again, I think a better strategy is to teach ALL staff about ableism, about disability justice, as part of their training. The strategies listed above are all downstream solutions.
- Please stop relying on broken systems to fix a problem. MDE and DHS have demonstrated they are not willing to work collaboratively with families. Where is the most important component...? Families as teachers. Families as Partners.
- ECE is NOT AVAILABLE to most kids. Why are the Olmstead goals for tiny groups of people, not all people with disabilities.
- This goal fundamentally misdiagnoses the crisis in Early Care and Education (ECE). The strategy assumes that disabled children are expelled from ECE programs because staff lack knowledge, coaching, or “leadership skills.” In reality, the ECE sector is experiencing an economic collapse. Staff are underpaid, turnover is massive, and staffing ratios are frequently too high to safely support children with complex needs or behavioral escalations. A trauma-informed webinar or a new “framework” for training will not change the structural reality that an ECE worker cannot safely manage a classroom if the ratios do not allow for individualized support. Furthermore, the measurable goal relies on staff self-reporting their need for training. Measuring staff feelings is not an Olmstead outcome. The goal must measure the retention and integration of disabled children. I suggest the following strategies: 1. Address ECE Economic Constraints and Staffing Ratios: DCYF must shift from funding “learning modules” to directly funding capacity. If a center accepts a child who requires a lower staff-to-child ratio for safety and inclusion, the state must provide immediate, frictionless funding to supplement that center's staffing costs. Inclusion requires structural labor, not just theoretical coaching. 2. Track ECE Expulsions and “Counseling Out”: The measurable goal must track the actual outcomes of disabled children, specifically the rate of formal expulsions and the informal practice of “counseling out” (where a

provider tells a parent they can no longer accommodate the child, forcing the parent to withdraw them). State data must explicitly track the loss of childcare for disabled infants and toddlers. 3. Rapid-Response Mobile Intervention for ECE: Instead of passive coaching frameworks, DCYF and DHS must fund active, rapid-response behavioral and inclusion specialists who can deploy immediately (within 24-48 hours) to an ECE center in crisis. ECE providers need on-site, hands-on labor to stabilize a placement, not a webinar on trauma-informed care delivered weeks after the child has already been expelled.

- Quality surveys with ECFE staff on what training and issues they are struggling with and focus strategies on their needs
- the focus needs to be on understanding behavior and supporting students not behavior management. Behavior at the ECE level is dominantly a form of communication.
- No
- Education Goal 4: Teachers, parents, families need to keep learning about disabled children to better engage with them. Should include families in this goal. Parents should be involved in communicating with their children.

Education Goal 5

- I think we are missing a significant piece in that many children could possibly experience maltreatment that we never know about. I believe that the strategy around training and the processes for reporting and investigation should be more robust and transparent.
- The current goal is significantly under-scoped and lacks seriousness. A reduction of “two students” is not a meaningful safety benchmark. Maltreatment of students with disabilities should be treated as a zero-tolerance issue, not a marginal improvement target. The proposed strategies are overly reliant on training and compliance verification, which have historically not prevented harm. Training does not substitute for accountability, system design, or enforceable protections. A critical issue missing from this goal is language deprivation and communication neglect. For Deaf, DeafBlind, and hard of hearing students, lack of access to a fully accessible language environment is a form of ongoing harm that contributes directly to isolation, misunderstanding, behavioral escalation, and increased vulnerability to maltreatment. This is not currently addressed as a safety issue, and there are no meaningful consequences when it occurs. To strengthen this goal, the state should: First, recognize communication access as a core student safety requirement. Failure to provide accessible communication (including American Sign Language where appropriate) should be treated as a risk factor for maltreatment and included in monitoring, reporting, and corrective action processes. Second, establish clear accountability mechanisms when maltreatment occurs. Identifying schools and offering training is insufficient. There must be enforceable consequences and required corrective actions tied to leadership, staffing, and service delivery failures. Third, require immediate environmental review when maltreatment is identified. This includes evaluating whether the student's placement is appropriate. If a student is in a setting where communication access or disability-

specific needs are not being met, the system should facilitate rapid transfer to a more appropriate environment. Fourth, expand and prioritize access to specialized, language-rich educational environments that reduce the risk of maltreatment by design. Minnesota already has established models, including the Minnesota State Academies and Metro Deaf School, where communication access is embedded and students are less likely to experience isolation or misinterpretation. Fifth, move away from neutrality in communication approaches. When systems fail to prioritize effective language access, the result is predictable harm. Educational environments serving Deaf and hard of hearing students must ensure full, direct communication access as a foundational safeguard-not an optional support. In summary, this goal should be reframed from a minimal reduction target to a safety-first standard with enforceable accountability. Maltreatment prevention requires addressing root causes-especially communication access failures-not expanding training requirements that do not prevent harm in practice.

- Is this addressing abuse at home or bullying? needs to be clarified.
- Cameras in classrooms
- Again, this is woefully inadequate. Maltreatment is notoriously difficult to prove. I think it would be much better to focus on the number of students who REPORT maltreatment rather than proven cases. The goal should be zero students report being mistreated in school.
- Again with PBIS -- you are not going to *discourage* maltreatment by using methods that encourage child compliance with adult demands at all costs. Noncompliance is a social skill.
- There needs to be a way to report the signs prior to the incident. Parents often know when their child is not being valued and is experiencing some level of mistreatment. Identify ways for parents to report the early signs and create ways to individually support intervention.
- All maltreatment should be followed up on. The standard procedures are not working. New, innovative interventions are needed. My kiddo was maltreated by both other students and special education staff. Locked in closets for crying. The goal to help 2 kids is a fracking joke.
- The measurable goal of reducing confirmed maltreatment by “at least two students” (0.001%) is not a goal; it is a margin of error. Setting an administrative target that inherently accepts the confirmed abuse of 26 disabled students per year as a “success” is an offensive abdication of the state's duty to protect its most vulnerable citizens. Furthermore, the strategies proposed to address systemic abuse-identifying problem schools and offering them “training and technical assistance”-are dangerously weak. Maltreatment is not a training deficit; it is an abuse of power, often facilitated by a lack of oversight and structural environments (like segregated classrooms) that hide the abuse from public view. I suggest the following strategies: 1. Mandatory Removal and License Suspension: Training is not an appropriate response to the confirmed maltreatment of a disabled child. MDE must mandate the immediate removal and automatic suspension of the teaching or administrative license for any staff member confirmed to have engaged in maltreatment, pending a full, independent state investigation. 2. Independent, Non-District Investigators: Maltreatment investigations are heavily influenced by the district's desire to protect itself from liability. MDE must establish an independent, external

investigative body that operates completely outside of the local school district's chain of command to investigate claims of abuse and restrictive procedures, ensuring districts cannot sweep maltreatment under the rug to maintain their compliance metrics. 3. Address Isolation as a Facilitator of Abuse (Beyond the "Integration" Binary): Maltreatment thrives in isolation. In traditional public schools, the most vulnerable disabled students are often placed in highly segregated special education rooms where abuse can occur without oversight. While MDE must dismantle forced segregation in mainstream districts, it must also recognize that linguistic and cultural immersion environments (such as Deaf schools and programs) are vital for Deaf and DeafBlind students and do not equate to harmful "segregation." However, these specialized environments still require aggressive oversight. MDE must focus on dismantling isolation and lack of transparency, rather than merely forcing physical integration, ensuring that all specialized programs have rigorous, independent oversight to prevent the epidemics of abuse and grooming that can occur in closed systems. 4. Strengthen Anti-Retaliation Infrastructure: Relying on "anti-retaliation policies" on paper is insufficient. Paraprofessionals, who are often the lowest-paid staff and the most frequent witnesses to maltreatment, risk their livelihoods when reporting abuse by licensed teachers or administrators. MDE must create a secure, state-level, anonymous whistleblower infrastructure that protects the employment and wages of support staff who report abuse. 5. Mandate Proactive, Preventative Oversight vs. Reactive Reporting: MDE's current framework relies entirely on abuse being reported after it has occurred. This is a reactive, damage-control model, not a prevention strategy. Many disabled students, particularly non-speaking students or those with significant intellectual disabilities, cannot report their own abuse. MDE must mandate proactive, unannounced oversight of high-risk environments (such as segregated behavioral programs and transportation services). Prevention requires consistent, independent observation of these settings by external compliance monitors, rather than waiting for a mandated reporter to overcome the district's power dynamics after the trauma has already occurred.

- Qualitative surveys/ interviews with students that have experienced abuse and ways they would like to be protected and able to report info safely and implement those strategies
- maltreatment of people with disabilities occurs when they are dehumanized and devalued. Training needs to go beyond the technical basics and also into anti ableism and disability culture.
- This goal seems like a low priority because the current number of students with disabilities that are identified as victims is so low (28). If anything, the focus should be on making sure cases of maltreatment are identified. There are also problems with the measurement plan. The goal is to reduce the number by June 30, 2027, but data is reported 24 months after the school year ends, so the cases that will be reported in 2027 have already occurred. The Olmstead plan will not have any impact on those.
- Pay paraprofessionals a living wage.
- Goal 5: This goal is fine but could use some work

Education Goal 6

- The current goal is too narrow and overly reliant on training and data review after the fact. Reducing restrictive procedures requires preventing the conditions that lead to their use-not simply analyzing and reporting on them. Restrictive procedures are most often the result of system failure: unmet communication needs, inappropriate placement, or lack of disability-specific supports. Without addressing those root causes, this goal will not produce meaningful change. A stronger approach should include the following: First, treat every use of a restrictive procedure as a system failure requiring immediate review. This review should determine whether the student's communication access, IEP services, and placement were appropriate at the time of the incident. If gaps are identified, corrective action must be required within defined timelines-not optional follow-up. Second, require communication-access verification before and after any incident. For Deaf, DeafBlind, and hard of hearing students, inability to communicate effectively is a major driver of escalation. If full access (including ASL where appropriate) is not in place, the environment itself is contributing to the crisis. Third, establish automatic placement review triggers. If a student experiences repeated restrictive procedures, the system should be required to evaluate whether the current setting is appropriate and facilitate transfer to a more suitable environment if needed. Fourth, prioritize access to specialized educational environments that are designed to reduce escalation by default. Schools such as the Minnesota State Academies, Metro Deaf School, Spero Academy, and Lionsgate Academy align instruction, communication, and environment in ways that reduce the likelihood of crisis escalation and restrictive intervention. Fifth, shift accountability from training completion to outcome-based performance. Schools should be evaluated on actual reduction of restrictive procedures and demonstrated use of effective alternatives, not participation in training programs. In summary, reducing restrictive procedures requires a prevention-first system: appropriate placement, full communication access, and immediate accountability when failures occur. Training and data analysis alone are not sufficient to achieve this goal.
- Increase the amount of support staff to support the student so restrictive procedures are not necessary.
- Also include an ability of parents/guardians to report what they see in regard to treatment of other children in the class. We are done with school at this time, but I have seen other children duct-taped to chairs, I have seen and OT slap my son's hand for putting it in his pants at age 3 - definitely not things that should have happened. Thei is WAY too low a bar for schools.
- Again, woefully inadequate and focuses only on downstreaming outcomes. A better approach would be to focus on training staff in techniques around de-escalation, co-regulationa, identifying student sensory needs, collaborative problem solving. The training should focus on how to avoid getting into situations where a restrictive procedure would ever need to be use. Not on how to avoid being sued when a restrictive procedure is used.
- Work with families to identify ways to better support the student and avoid triggers.

- Restrictive procedures are significantly more common than MDE knows. Most are never reported or counted. Classroom and program monitoring should be done to get an accurate picture of the many, many, many restrictive procedures used. Visiting my kids level 5 location I saw children choked by teachers, locked in time out - AKA a dark closet, and more. MDE does NOT know what happens in schools.
- The measurable goal of reducing restrictive procedures to 1.7% inherently accepts that a percentage of disabled children will continue to be subjected to physical restraint and seclusion. Restrictive procedures are not therapeutic tools; they are trauma-inducing capacity management strategies used by systems that lack the resources to safely de-escalate crises. Furthermore, the proposed strategies-analyzing data, training staff, and sharing information-are entirely passive. Data analysis does not stop a child from being pinned to the floor. To create genuine safety, MDE must move beyond “reducing” these procedures through training and instead mandate structural bans and enforcement. I suggest the following strategies: 1. Institute a Total Ban on Prone Restraint and Seclusion: Training school staff on “reducing” restrictive procedures leaves the door open for their continued use. MDE must pursue and enforce an absolute, non-negotiable statewide ban on prone (face-down) restraints, comprehensive physical restraints, and the use of locked seclusion rooms. 2. Fund Immediate, Specialized Mobile De-escalation Units: Schools often resort to restrictive procedures because they do not have clinical or behavioral specialists immediately available during a crisis. MDE, in partnership with DHS, must fund and deploy regional, rapid-response mobile de-escalation teams that can be called into a school to manage a crisis without resorting to physical violence or police intervention. 3. Enforce Financial Penalties for the Use of Restraint: Currently, there are no structural consequences for districts that heavily rely on restrictive procedures, only requests for “corrective action plans.” MDE must implement financial penalties for districts that consistently violate restrictive procedure guidelines, redirecting those funds to independent, third-party oversight and clinical support for the impacted students. 4. Track the Traumatic Impact and Educational Loss: Analyzing the “effectiveness of positive support strategies” is not enough. MDE must mandate that districts track the resulting trauma and educational loss caused by restrictive procedures. Data must capture the amount of instructional time lost, the psychological impact on the student, and the resulting informal removals (e.g., parents being called to pick the child up) that inevitably follow a physical restraint. 5. Distinguish Between Emergency Protection and Systemic “Management”: When challenged on bans, MDE frequently points to extreme edge cases (e.g., a student actively attacking staff) to justify the ongoing authorization of restrictive procedures. MDE must clearly delineate between brief, immediate physical interventions required solely to prevent imminent, serious bodily harm (e.g., separating a physical altercation), and the prolonged use of physical holds or locked seclusion rooms as a behavioral “management” strategy. If a student's environment routinely escalates them to the point of violence, the intervention must target the environment's failure to support the student's neurology, not physically overpowering the student. Relying on restraint is a symptom of a failed Functional Behavioral Assessment (FBA) and an inadequate IEP. The state

must require that any physical intervention to stop imminent harm instantly triggers an independent, external audit of the child's environment, staffing ratios, and sensory supports, rather than treating the restraint as an acceptable “solution” to a behavioral crisis.

- Qualitative interviews with students and their parents about alternatives to restraints that would have helped them and implement those strategies
- better training surrounding behavior as communication and a reduction in the use of compliance based goals in an education setting.
- Pay paraprofessionals a living wage. When students have good support, their behaviors are better.
- Education Goal 6: Mostly satisfied. Focus on dialogue as a positive supports.

Education Data Goal 1

- I believe that when we stop having to use our corrections system as the only means for ensuring access to mental health and substance use programs (those programs also need revision and considerations around insurance benefits being able to decide a person's treatment trajectory) we will be able to more appropriately meet the needs of youth and therefore have more success in returning them to educational settings.
- The proposed data points are overly focused on compliance and past behavior rather than forward progress. Measures such as attendance and behavioral incidents can reflect prior system failures and may unfairly penalize students re-entering education after correctional involvement. This goal should prioritize forward-looking outcomes, not retrospective tracking. First, shift the primary metric to measurable progress toward graduation. This should include credit accumulation, course completion, and attainment of a diploma or equivalent within a defined timeframe. Second, add a clear transition-to-employment outcome. The goal should track whether students are moving toward gainful employment, vocational certification, or post-secondary education. Re-entry success should be defined by stability and progress, not compliance indicators. Third, adopt a “reset” approach to data. Students exiting correctional facilities should not be anchored to prior attendance or behavioral records in a way that limits opportunity or biases evaluation. The focus should be on current engagement and forward progress. Fourth, ensure that re-entry plans include appropriate placement options that match student needs, including access to specialized environments when appropriate. Minnesota has existing models that support better alignment between student needs and educational delivery, including the Minnesota State Academies, Metro Deaf School, Spero Academy, and Lionsgate Academy. In summary, this goal should move away from tracking attendance and behavior as primary indicators and instead focus on meaningful outcomes: graduation progress and successful transition into employment or further education.
- How will this be accomplished?
- not enough info to make a comment

- I think it is a good thing that adolescent students with disabilities released from correctional facilities have an opportunity to continue their education. I find myself wondering if there disability is related to the reason they are incarcerated (lack of impulse control, heightened fight or flight response, trauma history, etc.) then why are they being incarcerated to begin with? I think it is more helpful to frame the question in terms of “what was this student missing that led to them being incarcerated? Was it a communication skill? A problem solving skill? An ability to identify right from wrong? Are there supports that were missing (access to food, access to housing, etc.) What is the plan to teach them the skills or provide what was missing? That is the conversation we should be having.
- I think you'd see a lot higher graduation rates among kids involved in the criminal legal system if you didn't imprison so many kids, but that apparently isn't the goal.
- Strengths-based approaches would be more effective than compliance-based approaches.
- This isn't a goal - “the goal will be about” Adolescents with disabilities in jail should be getting schooling!
- This proposed data goal is entirely focused on measuring the student's behavior and compliance, rather than measuring the system's infrastructure and accessibility. Tracking a disabled student's attendance, behavioral incidents, and graduation progress places the burden of success entirely on the adolescent who has just experienced the trauma of incarceration. It also ignores the intersectional reality of who these students are: predominantly Black, Indigenous, and youth of color, often male, who face a tangled web of systemic racism, ableism, and institutional bias when they attempt to re-enter the public school system. To align with the Olmstead mandate, the DOC and MDE must track the system's capacity-and willingness-to support the student's reintegration. Data collection must be restructured to measure systemic accountability:
 1. Track the Delay and Refusal in IEP/504 Implementation: The most significant barrier to a student continuing their education post-release is administrative friction and institutional bias. Districts frequently delay updating or implementing IEPs and 504 plans for youth exiting the DOC, acting on an implicit bias that these students are “too difficult” or that the effort is not worth it. The state must strictly track the “gap time” between a student's release and the full implementation of their IEP/504 plan, and explicitly track the rate at which districts fail to provide the services legally mandated within those documents.
 2. Track Denials of Re-Enrollment and Segregated “Push-Outs”: Districts frequently create bureaucratic hurdles to delay or deny the re-enrollment of students released from DOC facilities, often diverting them immediately to Alternative Learning Centers (ALCs) rather than allowing them to return to their home high school. The data must track how often students are denied re-enrollment in their home district or are pushed into segregated alternative programs against their will.
 3. Shift “Behavioral Incidents” to “Unmet Support Needs”: Tracking “behavioral incidents” post-release pathologizes the student's trauma response and reinforces the very racial and ableist biases that criminalized them in the first place. Instead, the data must track whether the receiving school successfully conducted an updated, trauma-informed Functional Behavioral Assessment (FBA) immediately upon release,

and whether the district actually deployed the staffing and clinical supports required. If a behavioral incident occurs, the data must reflect the system's failure to provide adequate transition support, rather than merely recording the student as a disciplinary failure. 4.

Disaggregate the Delay Data by Race and Gender: Because the systemic refusal to update or implement IEPs disproportionately impacts Black and Indigenous disabled boys, MDE and DOC must disaggregate this compliance data. They must track whether white disabled students exiting the DOC receive faster IEP implementation and service delivery compared to disabled students of color.

- Every disabled person should have easy access to any level of college education
- Qualitative Interviews with students that want to continue their education including their dreams, strengths, barriers and short and long term goals and implement this strategy into their educational plan
- How did they get to corrections in the first place? What does their home life need to help support these students?
- Education Data Goal 1: Should be supported by the Minnesota Commission for the Deaf, Deaf-Blind and Hard of Hearing organization. Work with consultants from other organizations and entities.
- Data Goal 1: We should have more improvement with this goal to be integrated and released into the community and have greater choice where they should be released.

Education Data Goal 2

- The current framing overemphasizes “coordination” with the Department of Corrections rather than successful transition out of the system. For many individuals, continued coordination with DOC after release is not a meaningful indicator of success and may create unnecessary system dependency. This goal should be reframed to prioritize independence, continuity of education, and seamless transition into community-based systems prior to release. First, shift responsibility away from DOC post-release. Education planning should be fully transitioned to community-based providers before an individual exits custody. Upon release, individuals should be connected directly to schools, adult education programs, or workforce pathways without requiring ongoing DOC involvement. Second, define success as continuity and stability. The goal should measure whether individuals are enrolled in an education or training program immediately upon release and whether they remain engaged long enough to make measurable progress. Third, prioritize practical outcomes over coordination processes. Metrics should focus on credential attainment, skill development, and movement toward employment-not the existence of interagency plans. Fourth, ensure that individuals with disabilities are connected to appropriate educational environments that match their needs, including specialized or disability-specific programs where applicable. Minnesota already has strong models that can support this transition effectively, including the Minnesota State Academies (for eligible populations) and disability-focused educational pathways such as Metro Deaf School, Spero

Academy, and Lionsgate Academy where relevant to transition-age individuals. In summary, this goal should move away from DOC-centered coordination and instead ensure that, before release, individuals are fully connected to independent, community-based education and employment pathways. Success should be defined by what happens after release-not by how well systems coordinate while someone is still incarcerated.

- I would add that these students need a thorough psych evaluations to address the reasons they were incarcerated and unable to finish school.
- I agree that incarcerated adults with disabilities should have access to educational supports before release. See previous response.
- What are “education supports”? Like, opportunities for education? Accommodations to make education programs accessible? Help getting enrolled in ABE/GED programming?
- wants to write a goal?!?! This is a plan? What a joke.
- The stated focus on providing “access” to “education supports” and “reintegration planning” relies on vague, passive language that fails to mandate structural execution. “Access” is often reduced to providing a pamphlet or putting an individual on a waitlist, and a “reintegration plan” is merely a piece of paper if the community infrastructure required to execute it does not exist or immediately rejects the individual upon release. To create a meaningful data goal, the DOC must explicitly define what constitutes an “education support” and measure the execution of these plans, not just their creation. I suggest the following data tracking requirements: 1. Define and Track the Execution of Specific “Supports”: The goal must not measure how many generic plans were written; it must measure how many plans survived contact with the outside community. The DOC must explicitly define which systems are involved (e.g., Adult Basic Education, community college enrollment, DEED/VRS, or county waiver-funded life skills training) and track the “warm handoff” success rate. The data must measure how many disabled adults actually started an educational program or training within 30 days of release. 2. Track the “Access” Loophole (In-Prison Denials and Exclusions): Before measuring reintegration, the DOC must track the systemic barriers to education while inside. Disabled adults are frequently excluded from in-facility education programs due to a lack of accommodations (e.g., no ASL interpreters, lack of accessible technology/screen readers, or being placed in segregated units for behavioral reasons). The data must track how many disabled adults were structurally excluded from education programs prior to release, and specifically identify the lack of accommodations that caused the exclusion. 3. Measure Pre-Release Economic and Benefit Reinstatement: Regardless of whether the “education support” is a university program, a trade certification, or Adult Basic Education, it is entirely useless if the disabled adult is thrust into economic freefall upon release. The DOC data must track the gap time between the individual's release date and the active reinstatement of survival benefits (e.g., Medicaid, SSI/SSDI, SNAP, and MnCHOICES assessments). If a disabled adult is forced to choose between navigating the county bureaucracy to survive and attending their education program, the reintegration plan has fundamentally failed. 4. Track Inter-Agency Denials (The Feasibility Catch-22): When the DOC's “reintegration plan” relies on external agencies (like DEED/VRS or county waiver

programs), those agencies frequently use the individual's lack of immediate stability (housing, transportation) or the compounding barrier of a criminal record to deny services, claiming the educational goal is not “feasible.” The DOC data must track the failure rate of its own plans—specifically, how often the “coordinated education supports” outlined before release are rejected, delayed, or waitlisted by the receiving state and county agencies the moment the individual exits the facility.

- Important
- Qualitative interview with adults about their educational desires including discussing their dreams, strengths, barriers, short and long term goals and identify appropriate settings
- No

Missing Education Goals

- no these are great
- These goals do not address supporting student agency and communication. Education needs to add having students, when possible, engaging in their learning goals, determining how they will be learning, and have multiple modalities of showing they understand the material being taught.
- What about post-secondary education or opportunities post transition?
- A major gap in these education goals is the absence of a strong, modern vocational and workforce development pathway for students with disabilities. The current framework is overly centered on college readiness and generalized academic outcomes, which does not reflect the needs or long-term success of many students. Minnesota should reestablish vocational training as a primary, not secondary, educational pathway. Historically, institutions like the Minnesota State Academies were grounded in preparing students for direct entry into the workforce. That focus has diminished over time, and it should be restored with urgency. The education system should recognize that success is not defined solely by college enrollment. For many students with disabilities, especially those who benefit from hands-on learning and structured environments, vocational pathways lead to more stable employment, greater independence, and reduced reliance on public systems. To address this gap, the state should: Rebuild and expand vocational training programs across secondary education, including within specialized settings and disability-specific schools. Establish clear workforce pipelines tied to high-demand trades and industries, with measurable outcomes related to employment, not just graduation. Integrate career exploration and skill-building earlier in a student's education, rather than deferring to post-secondary systems. Reevaluate the emphasis on college readiness as a universal goal, and instead promote multiple pathways to success, including skilled trades, certifications, and direct-to-workforce transitions. Align education outcomes with long-term independence, including reduced reliance on SSI, vocational rehabilitation systems, and other public supports where possible. In summary, the education goals are missing a critical focus on employment-driven outcomes. A balanced system should value and invest in vocational

pathways equally-if not more-than traditional college-track models, especially for students whose strengths and success are better aligned with hands-on, skills-based careers.

- planning for legal adulthood, integrating supported decision making principles: identifying needs, working toward skill building and building supports needed at age 18. reforming school policies based on IDEA that channel people with disabilities into guardianship eliminating policies and practices that presume guardianship will be needed, scaring parents into pursuing guardianship
- Transition is such a HUGE part of education for people with disabilities that our state continues to do poorly on. We are working on this-but every district does something different, there aren't uniform rules or laws on what has to be provided. Some districts don't even have a transition program. There needs to be a goal about transition service and maybe the continuity of programs in the state.
- The certificate and education programs regulated by state approved curricula do not offer flexibility or options for students with disabilities. The programs continue to offer one size fits all, without allowing enough diversity in the accomandations. These programs do not allow vocational options for students that need to complete requirements in smaller components. The programs are not designed for individual success, but to meet arbitrary standards. There are no educational or vocational programs offerered through the higher education system that allows for repetitive learning that meets the needs of neurodiverse students.
- See above.
- More, direct 1:1 supports in the classroom is needed and during school sponsored activities. School sponsored activities are missing per Olmstead and must be included for tru integrated compliance.
- I would like more goals focused on, you know, the educational aspects of education. How are students doing academically? How are we making sure that kids in DCD classes aren't just being pushed into "life skills" classes? How are we making sure that students with significant disabilities are actually being taught real academics and given the chance to earn a diploma, not just pushed towards a certificate of completion? Students with disabilities -- including students with intellectual disabilities and students with "challenging behavior" -- are human beings who have a right to a quality education. They're not problems to be managed with a nice face while non-disabled students get a real education.
- - Economic Restructuring of Support Staff: The goals completely ignore the economic reality of the paraprofessional and early childhood education (ECE) workforce. Training cannot fix a structural staffing crisis caused by unlivable wages. True integration requires funding the labor necessary to sustain it. - Absolute Bans on Physical Violence: The goals are missing a mandate for the total elimination of prone restraints, physical holds, and secluded locked rooms. Aiming to merely "reduce" state-sanctioned violence against disabled students is unacceptable. - Intersectional Data Tracking: The goals (particularly around discipline, maltreatment, and DOC release) fail to explicitly mandate the disaggregation of data by race and gender, ignoring the reality that Black, Indigenous, and Brown disabled students (especially boys) bear the

disproportionate brunt of exclusionary discipline, delayed IEP implementation, and school-based criminalization.

- Beyond Bachelor degree educational that is low or no cost at the outset. Graduate degree programs supported by no cost at outset will be rewarded by actively engaged and intellectual growth by graduation. Many more programs need to be Disability centered graduate degrees. We would be building our own set of intellectual growth to lead and research programs in disability studies.
- Growing up in a catholic church, they don't provide funding from the government, so they don't offer as many services for disabled people going through their systems. Needs to be better ways to help people with disabilities because some teachers don't know how to interact with students. Always bullied and teased in schools. Teachers shouldn't send kids to their parents and blame them for all their problems in the classrooms. It should be okay to be in special education. We can help other disabled people get educated at a younger age to know things .
- Listen to people with disabilities in developing these strategies. Each person is unique
- The cost of education has been raised as a key driver of expenses in the Minnesota budget, yet the question is what is our commitment to support the education of children and individuals with disabilities?
- No
- Growing up in a catholic church, they don't provide funding from the government, so they don't offer as many services for disabled people going through their systems. Needs to be better ways to help people with disabilities because some teachers don't know how to interact with students. Always bullied and teased in schools. Teachers shouldn't send kids to their parents and blame them for all their problems in the classrooms. It should be okay to be in special education. We can help other disabled people get educated at a younger age to know things .

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