

Spring 2026 Public Comment Summary: Education

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Introduction

This report shares findings from the spring 2026 public comment period on the draft Olmstead Plan. The public comment period sought feedback about proposed Olmstead Plan goals.

Draft Olmstead Plan background

The first Minnesota Olmstead Plan was adopted in 2015. In 2023, the Olmstead Subcabinet decided it was time for a more comprehensive update. For the plan update, OIO worked with a contractor called Dendros Group. Dendros Group brought on people with lived experience of disability as Inclusion Consultants. Inclusion Consultants worked with state agency staff to write goals and strategies for the draft plan.

The draft plan included both measurable goals and data collection goals. Measurable goals are specific, measurable, achievable, relevant, and time-bound (SMART). Measurable goals are the foundation of an effective Olmstead Plan. Data collection goals represent issues that agencies want to write goals about, but don't have the data to create a measurable goal yet. The draft plan grouped goals into seven topics:

- Crisis services
- Education
- Employment
- Health and safety
- Housing
- Transportation
- Transition

For more information about Olmstead, the 2026 plan drafting process, and to read the draft plan, please visit the OIO website: MN.gov/olmstead

Public comment period background

The Olmstead Implementation Office (OIO) held the public comment period in partnership with the Dendros Group, Inclusion Consultants, and state staff. The public comment period took place in April and May 2026. It included:

- An online survey
- Virtual meetings and individual interviews
- Email comments and submissions from organizations

Online survey

The online survey was available in English, Spanish, Hmong, Somali, and American Sign Language (ASL).

Survey participants could choose which goal topics to share feedback about. They could also choose to give general feedback about topic areas overall, specific feedback about individual goals, or both. The survey was anonymous, and all questions were optional.

Survey questions

The survey asked the following questions about each topic area:

- Do you think reaching these goals will improve the lives of Minnesotans with disabilities? (multiple choice question)
- Are there any topics or issues you feel are missing from these goals? (comment box question)
- Do you have any general feedback about these goals? (comment box question)

The survey asked the following questions about each individual measurable goal:

- Do you think this is an important question for the lead state agency to address? (multiple choice question)
- This measurable goal is... (multiple choice question)
- Do you have any ideas of other strategies and action steps to reach this goal? (comment box question)
- Do you think reaching this goal will improve the lives of Minnesotans with disabilities? (multiple choice question)

For data collection goals, the survey asked, “Do you have any feedback about this goal?” with a comment box.

The survey also included optional demographic questions.

Virtual meetings and individual interviews

Dendros Group planned and implemented virtual meetings as part of the public comment period. Inclusion Consultants facilitated the meetings. Dendros held seven meetings, one for each topic in the plan. The meetings were intended to be an accessible alternative to the online survey. Registration was open to the public, and the meetings took place on Zoom.

Facilitators asked the following questions during virtual meetings:

- What would make these goals more effective to improve the lives of Minnesotans with disabilities?
- What would make these goals more effective to better integrate Minnesotans with disabilities in community life?
- What's missing from these goals?

Dendros Group also offered individual interviews. The interviews were intended to be an accessible alternative to the survey and virtual meetings. Inclusion Consultants conducted the interviews.

Email comments and submissions from organizations

OIO also received public comments through email. These comments came from individuals and organizations.

Goals included in this report

- Education Goal 1: More students with disabilities will learn in integrated classrooms.
- Education Goal 2: Schools will better engage families of students with disabilities.
- Education Goal 3: Fewer students with disabilities will be suspended and expelled.
- Education Goal 4: More staff will be equipped to support children with disabilities in early care and education (ECE).
- Education Goal 5: Fewer students with disabilities will experience maltreatment at school.
- Education Goal 6: Fewer students with disabilities will experience restrictive procedures.
- Education Data Goal 1: Adolescent students with disabilities released from correctional facilities will have an opportunity to continue their education.
- Education Data Goal 2: Incarcerated adults with disabilities will have access to education supports before release.

Total number of community input submissions and comments

This table shows the number of submissions and comments about education.

Source	Number of submissions	Number of comments
Survey	33	144
Virtual meeting	20	Not available
Emails and letters	3	29

Notes:

- Submissions from organizations are counted as one respondent.
- The number of comments from virtual meetings is not available.
- Interviews are included in the survey totals.
- The number of survey submissions counts people who answered open-ended questions. Some participants may have only answered multiple-choice questions. For that reason, the number of survey submissions may not match the number of responses to multiple-choice questions.

General feedback

This section summarizes feedback about the topic overall. Feedback about specific goals is included later in this document.

Survey question: Do you think reaching these goals will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	10	29.4%
Yes, some improvement	13	38.2%
No improvement	6	17.6%
Unsure	5	14.7%
Total	34	100%

Themes from all input

Schools need more and better resources to support students.

Participants shared that the draft goals should address structural and financial resources for schools. They said that having sufficient resources can ensure students learn in appropriate settings.

Quotes:

- “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 early childhood education 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.”
- “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.”
- “These are inspiring statements and are true – we all want what is stated. However, they are extraordinarily 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.”

Goals are not ambitious enough.

Members of the public shared that the current goals are not aspirational. They said the goals do not go beyond what is already required by law.

Quotes:

- “Overall I feel these goals are very short-sighted. I think the percentages 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.’ ... I also really think that we can't put a blanket goal on the state [and should have regional goals.]”
- “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 people with disabilities and this plan misses the mark completely.”
- “Compliance with existing law should not be reframed as a future goal. For example, the goal stating that by June 30, 2030, 100% of students with disabilities will have complete postsecondary transition planning in their IEPs is already required by law. This should already be happening and enforced now, not treated as a future target. Presenting it as a long-term goal may suggest a lack of urgency in fixing known gaps in the current system.”

- “Minnesota has consistently demonstrated the ability to rise to complex challenges and lead meaningful systems change. However, plans built on minimal improvements do not create the conditions necessary for growth; they reinforce the current systems. If this Plan is meant to guide real inclusion, it must set goals that push systems to improve, create better outcomes, and fully support the promise of *Olmstead v. L.C.*”

Teachers and school staff need better training about disability.

Members of the public shared that all teachers and school staff need better training about disability, not just special education teachers and staff. The training should be more robust and include people with lived experience.

Quotes:

- “I would like to see a program created by the state in conjunction with early childhood special education (ECSE) in districts to hire teachers to train teachers in early childhood education (ECE) about working with children with Individualized Education Programs (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.”
- In a virtual meeting, “another parent argued that reducing the percentage of staff needing additional behavioral training from 48% to 40% was not ambitious enough. Her son has been sent home despite dedicated staff support. The personnel lack adequate preservice and in-service training. The plan needs stronger goals, increased investment in preservice and in-service training, and accountability so families can trust that schools will keep children safe, supported, and understood.”
- “This parent expressed concerns about whether personnel are prepared to support a student with both behavioral and sensory needs. The goals should be higher by expanding disability-informed training across all early childhood settings, aligning training with elementary schools, and ensuring that more than 50% of staff receive formal positive behavioral training, with 100% of staff trained within the next five years.”
- “A person with a disability described her experience as a paraprofessional who received no training in special education or positive behavior supports. Substitute teachers are overlooked in their professional development despite staffing shortages and the frequent reliance on them. She urged ongoing training.”
- “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.”

- "Training for all school staff, including bus drivers, administrative personnel, food service staff, custodial staff, and security personnel."

Teachers and school staff need more support and resources.

Members of the public shared that staff are burdened by trainings, paperwork, and caseloads. They should also be compensated better overall, especially paraprofessionals.

Quotes:

- “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.”
- In a virtual meeting, “a parent of a child with Down syndrome and a resident of Greater Minnesota proposed a new goal by improving the quality of special education services. The recommendation was to increase the number of qualified staff while reducing caseloads. Drawing from personal experience, she stated that students were not receiving services outlined in their IEPs due to staffing shortages. She suggested measuring progress through reductions in complaints about unmet IEP requirements.”
- “Pay the paraprofessionals a good wage. These hard working people make the difference in integrating kids to regular classrooms.”

The goals need more focus on accountability and enforcement.

Members of the public shared that they believe districts need to be held accountable for the services they should be providing to students. They also mentioned stronger enforcement mechanisms and more transparency.

Quotes:

- “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.”
- “The education goals, as written, are too soft and overly reliant on expanding systems, training, and administrative processes ... 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.”

- In a virtual meeting, “a parent who has a disability and three children with autism described how her children are punished for behaviors already identified in their IEPs as related to their disabilities. One student was restrained, arrested, and charged for a school incident that could have been prevented if the child had received the support listed in the IEP. She urged stronger accountability, transparent reporting, and enforcement of IEPs before disciplinary action is taken. She stressed that punitive responses contribute to the school-to-prison pipeline and undermine inclusion.”

The plan should address the diversity of student needs.

Members of the public shared that there needs to be a distinction between services for those in the metro areas versus greater Minnesota, and a recognition of the needs of students from diverse backgrounds and cultures.

Quotes:

- “The same statewide percentage goals may not work equally well in every part of Minnesota. Different regions have different needs, available services, and staffing levels. Because of this, a 2-4% increase could be much easier in some areas and much harder in others. levels. Because of this, a 2-4% increase could be much easier in some areas and much harder in others. Without taking these differences into account, statewide goals may hide gaps and allow inequities to continue, especially in Greater Minnesota and other underserved areas. The Plan should include goals based on the needs and starting points of different regions. It should also include strategies to make sure progress happens fairly across all parts of the state, instead of using the same goals for every community.”
- “The education system is awfully lacking in supporting brown and Black children in a culturally and linguistically appropriate way. We have parents that are severely underinformed or misinformed ... Many children end up falling between the cracks.”

Missing topics

People shared which topics they thought were missing from the education goals.

Intersectionality

- “Intersectionality: Community members said the state must address disparities based on other identities held by people with disabilities. These identities can include race, ethnicity, gender, sexuality, socioeconomic status, language, and more.”
- “Racial Disparities: The Leadership Forum and the Subcabinet both committed to addressing this issue, but it is not mentioned or addressed in this plan.”
- "Schools should have more specialized staff trained in de-escalation techniques, trauma-informed care, and culturally responsive mental health support, including therapists and counselors. In addition, LGBTQ+ youth often face unique challenges and need safe, affirming spaces. Just as schools provide physical accommodations for students with physical disabilities, schools should ensure gender-neutral bathrooms and supportive environments for all youth. Finally, stronger family engagement and culturally responsive education for families are essential so caregivers can better understand mental health needs and access appropriate support early."
- "Immigrant families may not know and are not aware of what services exist for children with developmental or physical delays and may not know what questions to ask. They need someone to tell them and lead them in the processes. Time is of essence."

Agency and independence of students

- Agency of Students: “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.”
- “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 the Individuals with Disabilities Education Act that channel people with disabilities into guardianship, eliminating policies and practices that presume guardianship will be needed, scaring parents into pursuing guardianship.”

Transition services for students

- “A major gap in these education goals is the absence of a strong, modern vocational and workforce development pathway for students with disabilities ... 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.”

- “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 accommodations. 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 offered through the higher education system that allows for repetitive learning that meets the needs of neurodiverse students.”
- “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 [disabled] kids ... 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?”
- "Mandate early, culturally responsive transition planning starting no later than age 14, with required family education, language access, and coordination across school, healthcare, and county systems."

Staffing crisis

- “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.”

Feedback about individual goals

Education Goal 1: More students with disabilities will learn in integrated classrooms.

Lead agency: Minnesota Department of Education (MDE)

Survey questions about Education Goal 1

The following tables show results of multiple-choice survey questions.

Do you think this is an important issue for MDE to address?

Response	Count	Percentage
Very important	15	68.2%
Important	5	22.7%
Not important	0	0%
Not at all	2	9.1%
Unsure	0	0%
Total	22	100%

This measurable goal is...

Response	Count	Percentage
Too high	3	15.8%
Just right	3	15.8%
Too low	10	52.6%
Not sure	3	15.8%
Total	19	100%

Do you think reaching Education Goal 1 will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	8	42.1%
Yes, some improvement	6	31.6%
No improvement	4	21%

Response	Count	Percentage
Not sure	1	5.3%
Total	19	100%

Themes from all input about Education Goal 1

General feedback about the Education Goal 1. Public feedback included comments about educational needs for the Deaf, DeafBlind, Hard of Hearing students, support for teachers/staff, goal measures being too low/limited, racial disparities not addressed, and appropriate placement concerns.

Quotes:

Education for Deaf, Deafblind, Hard of Hearing Students

- “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.”
- “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 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, Spero Academy, and 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.”

- “This goal assumes that integrated settings are universally the best placement for all students with disabilities. While integration may benefit some students, applying this framework broadly can harm Deaf, DeafBlind, and Hard of Hearing students when full and direct communication access is not prioritized. Students and their families should be encouraged by our systems to choose the setting that works best for them, without pressure (direct or indirect) from systems that one type of setting is better than the other.”
- “For these students, educational placement must be determined by communication access and language development needs in accordance with FAPE. A setting that does not provide meaningful communication access cannot be considered the Least Restrictive Environment (LRE). Specifically, “...any setting that does not meet the communication and related needs of a child who is deaf does not allow for the provision of FAPE and cannot be considered the LRE for that child. Several concerns contribute to this issue:
 - Deaf, DeafBlind, and Hard of Hearing students have unique educational needs centered on language acquisition and communication access, which differ significantly from many other disability populations.
 - Minnesota currently lacks a comprehensive language acquisition assessment system and sufficient qualified assessors for Deaf, DeafBlind, and Hard of Hearing students.
 - Placement decisions are often influenced by local resource limitations and district preferences rather than individualized language assessments and communication access needs.
 - General education classrooms are not inherently accessible communication environments. Supports such as qualified sign language interpreters, captioning, visual communication strategies, and trained personnel are inconsistent or unavailable.
 - Students frequently receive inadequate services due to shortages of qualified interpreters and itinerant Deaf and Hard of Hearing teachers.
 - Families are often not fully informed nor informed without bias (often unintentional) about placement options, communication access needs, and available advocacy resources.
 - The current language unintentionally suggests that placement with nondisabled peers is the preferred educational setting, creating a negative perception of environments where Deaf, DeafBlind, and Hard of Hearing students learn together with peers who share similar communication access needs. “

More support for teachers/staff to allow successful inclusion

- “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.”

- “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.”

Concerns about goal measures being too low/limited

- “OMHDD concurs with the underlying intent that more MN students with disabilities will learn in an integrated classroom. However, this goal falls deeply short by limiting itself to a one-year goal, by January 1, 2027, to increase the number of students in integrated settings by 2.16%. In looking at the baseline data provided, an increase of 2.16% translates to 3,126 more students in one year learning in integrated classrooms compared to the 144,720 students with disabilities. Assuming a 2.16% increase is an acceptable target per year, which OMHDD believes is far too low, limiting it to a one year goal, as opposed to a five-year goal with year over year increases in students learning in the most integrated setting, leaves out an estimated 12,504 students had the goal to increase by 2.16% simply been extended to each of the draft plan’s five years.”
- “This is a critical goal for students with disabilities and for the Olmstead Plan. The target appears to be that, over one year, there will be a net increase of ~3,125 students with IEPs educated in the most integrated setting, compared to the previous year. If this is an inaccurate interpretation of the target, please clarify with the specific target number. Additionally, there is only a single-year target for this goal. Regardless of interpretation, our reviewers agree that this target is extremely low, and the lack of ongoing, targeted improvement raises even greater concern. It is also unclear how, or if, the proposed strategies would directly lead to any change in results. Minnesota has a long way to go in improving this area, and, as written, it can reasonably be assumed that the target could be met without implementing the proposed strategies.”

Racial disparities

- “Additionally, as a state, we know that significant and harmful racial disparities persist in special education. We’ve known for decades that African American and American Indian children are disproportionately represented in special education and more restrictive settings. Despite knowing this, and despite the plan referencing an intent to acknowledge and address disparities in the goal development, OMHDD finds the omission disappointing.”
- “Somali students with disabilities are too often defaulted into segregated settings without families understanding that more integrated options exist or that segregation is not required.”

Appropriate placement

- “OMHDD questions how the strategies identified will be different than existing training and best practices available from MDE to promote inclusive education. Ways to incorporate enforceability of local school districts’ obligations to serve children with disabilities in the most integrated setting are sorely needed. Too often, OMHDD sees students and families pressured into accepting overly restrictive settings due to schools’ lack of capacity or understanding of their obligation to students with disabilities under state and federal law.”
- “There are many significant variables not accounted for within the proposed strategies that can subvert and undermine this goal. Of note, local teams can declare that individual students require a higher setting than can be provided by the school (i.e., they will say, “We just cannot support your student in this setting,”), effectively ending any discussion about inclusion.”
- “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.”
- “Mostly integrated. Making referrals and placements without the school district forcing them one way or another.”

Strategy ideas for Education Goal 1

Respondents shared many strategy ideas to consider for Education Goal 1. These suggestions have not been vetted for scope or funding and are submitted as written.

Quotes:

Focus on appropriate placement and not just number of students integrated

- “Revise the goal to focus on ensuring that students receive educational placements and services that best meet their individual communication access and learning needs. The goal language should emphasize ‘appropriate placement’ rather than increased integration. Placement decisions should be based on individualized determinations of FAPE and meaningful communication access, not local resource limitations, audiograms, district preferences, or federal reporting metrics. Alternatively, Deaf, DeafBlind, and Hard of Hearing students should be exempted from this goal and related reporting metrics. For Deaf, DeafBlind, and Hard of Hearing students, the true meaning of LRE is the educational setting that provides full and

direct communication access. The Olmstead decision is grounded in person-centered principles and meaningful connection, and this goal should reflect those principles. Current federal data collection methods do not measure communication access, language development, or meaningful educational access for Deaf, DeafBlind, and Hard of Hearing students. Tracking integration rates without considering these factors perpetuates misunderstandings about both inclusion and LRE. Additionally, ‘...there is no requirement that a state place a certain percentage of children into one educational environment over the other, nor...a specific regulatory requirement specifying a state’s SPP/APR target for the percentage of children in the regular classroom environment.’”

- “Incorporate counties in the education process for a holistic support system with home and community supports for long term supports.”

Increase support/training for staff

- “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.”
- “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.”

Increase parent involvement

- “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.”
- “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”
- “Require that any placement recommendation in a more restrictive setting be accompanied by a written explanation, in the family’s language, of what less restrictive options were considered and why they were not chosen.”

Address disparities/individual needs

- “In addition to setting higher targets that continue over the course of 5 years, we recommend that the final Plan also set subgoals by disability type and race/ethnicity that create targets and accountability for schools to address disparities for children who represent groups disproportionately represented in segregated settings. Looking at the current data, there are over 55,000 students (>36% of students with disabilities in our public school system) who are kept in segregated settings. Framing it in more overtly positive terms, like in the draft Plan, undercuts the severity of the issue.”
- “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.”
- “Track placement data disaggregated by race, ethnicity, and home language. If Somali students with disabilities are being placed in segregated settings at higher rates than peers, the state needs to know and act on it.”

Education Goal 2: Schools will better engage families of students with disabilities.

Lead agency: MDE

Survey questions about Education Goal 2

The following tables show results of multiple-choice survey questions.

Do you think this is an important issue for MDE to address?

Response	Count	Percentage
Very important	14	66.7%
Important	6	28.57%
Not important	0	0%
Not at all	1	4.8%
Unsure	0	0%
Total	21	100%

This measurable goal is...

Response	Count	Percentage
Too high	1	5.3%
Just right	3	15.8%
Too low	12	63.2%
Not sure	3	15.8%
Total	19	100%

Do you think reaching Education Goal 2 will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	9	45%
Yes, some improvement	3	15%
No improvement	4	20%
Not sure	4	20%
Total	20	100%

Themes from all input about Education Goal 2

General feedback about Education Goal 2. Public feedback included comments about concerns about targets being too low, a need for definitions/clarity on the goal, concerns around inclusion for diverse communities, among others.

Quotes:

General

- “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.”
- “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.”
- “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.”
- “Family engagement must go beyond surveys and outreach. Schools should be required to provide culturally and linguistically appropriate communication, explain parents’ rights in plain language, and ensure families understand evaluations, IEP decisions, placement options, discipline protections, and dispute resolution processes.”
- “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.”

- “The data this goal relies on is unclear or unreliable and does not reflect meaningful comparisons between baselines and projected goals.”
- "Early intervention and family support is essential when we are talking about children. Many families may not be aware or may be in denial of developmental delays or problems. Many families cannot afford formal daycare and rely on the mothers, family members or friends to take care of children. So it is very important that parents know and understand when their children may face any developmental delays ASAP."

Need for clarity and definitions

- “Nowhere in the draft plan is family engagement defined. As an entity providing direct special education advocacy services for students with disabilities under our purview, OMHDD has concerns about the lack of transparency and confusion in the absence of clarity on what does and does not constitute family engagement. Are families who participate in the survey predisposed to report higher engagement? For this goal to be meaningful, it would be helpful to also know how many total surveys were sent out and the corresponding response rate.”
- “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.”

Issues with goal targets/targets being too low

- “A target of 72% of families of children with IEPs will report that schools will facilitate engagement seems too low. While it may align with MDEs target as established by its federal Office of Special Education Programs obligations, incorporating the very same benchmark into the Olmstead draft plan does nothing to move Minnesota forward. MDE’s starting baseline of 69.8% fails to recognize that this is lower than pre-pandemic levels, which were at a high point of 74.49% in the 2019/2020 school year per MDE’s most recent report. Communicating not just percentages, but target numbers is important. Using existing data on the number of responses received in the baseline information, the goal is met with a mere five additional families to cross the 72% threshold established by the federal government. Five. Again, this does not align with the stated intent of the plan goals to have a meaningful impact.”
- “As in education goal one, we question why only one year of a five-year plan is included. Assuming the target of 72% was achieved by February 1, 2027, why would we not strive toward continued incremental increase each year? Given the timeline of the plan’s implementation, OMHDD cannot envision a scenario in which the plan is approved in the fall of 2026, MDE develops and deploys its listed strategies, and those strategies having had a meaningful impact

prior to February 1, 2027. How will we discern the impact of those strategies without additional goals for the duration of the plan?”

- “The target appears to be that, over one year, there will be a net increase of 4 families reporting that their schools facilitate family engagement. This is a very low target, and it is equally concerning that the current goal is for a single year. If this is an inaccurate interpretation of the target, please clarify with the specific target number and the annual targets for the next 5 years. Additional reviewer comments include:
 - The sole target metric is volume (i.e., number of total engagements) and does not quantify or track quality. If the goal is better engagement, metrics and data must be added to improve the overall quality of each engagement.
 - Will better engagement support the values of the Olmstead Plan? If so, the strategies should convey the direction of the engagement, and training should be provided to help families engage more effectively in supporting integration and inclusive communities.”
- “While family engagement is important, this goal largely reflects responsibilities already required under existing special education law. The IEP process already mandates collaboration between schools and families. As written, the goal is not sufficiently ambitious and is unlikely to produce meaningful new information that improves educational systems or student outcomes. Families continue to report feeling unheard, unsupported, or uninformed during the IEP process. Many reports receive incomplete or biased information regarding educational placements, communication access, and language development services. Because Minnesota grants substantial authority to local districts, families often feel their requests for services or placements are denied without meaningful collaboration.”

Strategy ideas suggested for Education Goal 2

Respondents shared many strategy ideas to consider for Education Goal 2. These suggestions from survey respondents focus on student assessment/evaluation, inclusion of diverse communities, and address structural/power imbalances. These suggestions have not been vetted for scope or funding and are submitted as written.

Quotes:

- “Schools will provide culturally responsive parent education and language-access support so families of students with disabilities can fully understand and participate in the IEP process.”
- “In IEP meetings, interpretation often does not capture what is being decided. Disability and special education vocabulary in English — terms like ‘least restrictive environment,’ ‘specific learning disability,’ ‘emotional behavioral disorder,’ ‘transition planning,’ ‘due process’ — does not have direct equivalents in Somali. Interpreters, even well-trained ones, often substitute approximate phrases that change the meaning of what parents are agreeing to. Parents sign IEPs they do not fully understand. Decisions about placement, services, and discipline are made without informed consent.”

- “Partnerships with trusted community organizations are essential to increasing parent and caregiver participation, especially for families who face language and cultural barriers. Many families in public and charter schools come from diverse backgrounds, and traditional school outreach methods do not always reach or effectively engage them.”
- “Replace this goal with one focused on measuring family satisfaction with the IEP process itself. The revised goal should include both quantitative and qualitative measures to evaluate whether families feel informed, respected, heard, and meaningfully involved in educational decision-making. The Olmstead Plan should promote continuous systems improvement rather than simply reporting information already collected through existing legal processes. Ideally, a neutral third party would develop and administer tools to gather family feedback, evaluate family experiences, and assess whether student goals and outcomes are progressing appropriately over time.”
- “Have parent mentors for other parents.”
- “Develop and standardize Somali-language terminology for special education and disability concepts, in partnership with Somali community members, educators, and people with disabilities. This is a community-led terminology project, not a translation contract.”
- “Require that interpreters used in IEP meetings be trained specifically in special education vocabulary, not only in general interpretation.”
- “Provide pre-meeting orientation for families in their language so parents understand what an IEP is and what their rights are before they walk into the meeting.”
- “Track and publicly report family engagement survey results disaggregated by language and ethnicity, so the state can see whether Somali families are actually being engaged or being counted.”
- “School districts that serve many immigrant parents should be required to hire community liaisons, navigators, and community outreach and engagement personnel.”
- “OMHDD appreciates the expansion of outreach efforts to underrepresented communities beyond families who speak languages other than English, Hmong, Somali, and Spanish as a strategy.”
- “Focus on a student-centered approach building off positives.”
- “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.”
- “I suggest the following strategies:
 - 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.”
- “Increase support staff in schools and community centers.”
- “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.”

Education Goal 3: Fewer students with disabilities will be suspended or expelled.

Lead agency: MDE

Survey questions about Education Goal 3

The following tables show results of multiple-choice survey questions.

Do you think this is an important issue for MDE to address?

Response	Count	Percentage
Very important	15	71.4%
Important	4	19%
Not very important	1	4.8%
Not at all	1	4.8%
Unsure	0	0%
Total	21	100%

This measurable goal is...

Response	Count	Percentage
Too high	2	10.5%
Just right	4	21%
Too low	10	52.6%
Not sure	3	15.8%
Total	19	100%

Do you think reaching Education Goal 3 will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	5	26.3%
Yes, some improvement	6	31.6%
No improvement	4	21%
Not sure	4	21%
Total	19	100%

Themes from all input about Education Goal 3

General feedback about the Education Goal 3. Public feedback included comments about concerns around the use of PBIS and inappropriate or mismatched placements for students leading to discipline.

Quotes:

Supports for students needed

- “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.”
- “One parent shared her son’s experience of being placed in a segregated behavioral classroom, which limited his opportunities for inclusive learning. She called for stronger implementation of manifestation determination reviews under IDEA to ensure schools assess whether a behavior is related to a student’s disability before discipline occurs. She recommended improvements to functional behavior assessments and proactive behavior intervention plans, as well as public reporting of suspension data by race. She urged that suspension rates drop to below 1% while expanding staff training and inclusive practices.”

Goal unclear

- “The way the goal is written it is not clear if this is a goal to lower the %age, maintain it, or increase it.”

Goal target too low

- “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 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."

- "With OIO anticipating plan approval in the fall of 2026 and a single goal date of February 1, 2027, OMHDD questions the feasibility of MDE developing and incorporating their enumerated strategies. If reducing the number of identified school districts by 12 schools is possible in less than the first six months of the plan, why wouldn't we as a state seek to reduce by another 12 schools in subsequent years until we reach zero? Given the civil rights implications and the number of MN school districts facing administrative or legal action from both the state and federal level in recent years, there should be no "acceptable" number of districts reporting these disparities. At a minimum, in our state's Olmstead plan, we should collectively strive to maximize equity, justice, and inclusion for all students, regardless of their district."

Positive Behavioral Interventions and Supports (PBIS)

- "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."
- "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 communication function and find the cause of the behavior and support the unmet need. Additionally to move forward with this goal in a 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.”

- “Does the strategy expanding use of PBIS statewide mean to all schools in MN? Or another incremental expansion in different parts of the state?”
- “Another parent explained that behavior is communication, and the behavior stems from unmet needs, triggers, or emotional dysregulation. Suspension removes students without addressing root causes and worsens student outcomes. She advocated for PBIS and added professionals to help schools identify triggers and implement positive behavioral plans, ensuring support rather than exclusion.”

Disproportionate discipline

- “This goal insufficiently addresses school districts identified as disproportionately disciplining students with disabilities. Working to reduce the number of school districts known as disproportionately disciplining students with disabilities is critical. OMHDD would suggest that if the intent of the discipline definition is to mean suspension longer than ten consecutive days, that be clarified. Otherwise, there may be some confusion about cumulative days in a school year and manifestation determination implications.”
- “It should be clarified that discipline as defined in draft goal only refers to suspension longer than 10 days or expulsion and not to all defined types of discipline in Minnesota Statutes 2025, Chapter 121A. The source of the definitions for the three terms that appear on page 18 should be provided. The measurable goal and outcomes appear to be about a small subset of specific, though unnamed, schools. This would indicate that, related to this goal, the draft Plan is only concerned with impacting students enrolled at the targeted schools, not with broadly addressing this issue for students across all districts. If the intent is to impact all students, please re-read Chapter 121A to look at all definitions of discipline to help better describe the intent of this goal. Clarify if the target is for a net decrease of 2.44% in the total school districts identified as disproportionately disciplining students with disabilities and include the actual number of estimated students this should impact. Additionally, annual target goals for a span of 5 years should be developed and provided, not a single year goal.”

Strategy ideas suggested for Education Goal 3

Respondents shared many strategy ideas to consider for Education Goal 3. These suggestions have not been vetted for scope or funding and are submitted as written.

Quotes:

- “Qualitative surveys with students disciplined on what would have worked better for them and implement their strategies.”

- “Increase developmentally appropriate practices in grades K-3 that includes play and social emotional learning.”
- “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.”
- “Work with counties to provide a holistic approach to behavior, use positive behavior support.”
- “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.”

Education Goal 4: More staff will be equipped to support children with disabilities in early care and education (ECE).

Lead agency: Department of Children, Youth, and Families (DCYF)

Supporting agencies: MDE, MDH, DHS

Survey questions about Education Goal 4

The following tables show results of multiple-choice survey questions.

Do you think this is an important issue for DCYF to address?

Response	Count	Percentage
Very important	14	70%
Important	4	20%
Not important	0	0%
Not at all	1	5%
Unsure	1	5%
Total	20	100%

This measurable goal is...

Response	Count	Percentage
Too high	2	11.8%
Just right	4	23.5%
Too low	9	52.9%
Not sure	2	11.8%
Total	17	100%

Do you think reaching Education Goal 4 will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	8	40%
Yes, some improvement	6	30%
No improvement	3	15%
Not sure	3	15%
Total	20	100%

Themes from all input about Education Goal 4

General feedback about the Education Goal 4 included training needs/concerns, concerns about the goal being too low/narrow, staffing needs, and focusing on the needs of the students.

Quotes:

Training needs and concerns

- “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.”
- “I support training for the ECE workforce, as it equips staff to better serve children with disabilities and promotes more inclusive early childhood programs.”
- “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.”
- “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.”

Staffing issues

- “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.”
- “There is a single target goal set for 2029, and although this is better than the single-year targets for the other education goals, it is considered insufficient by reviewers. Though staff are self-identifying a need for training in behavior management, we are concerned that from an Olmstead perspective, person-centered, positive supports are more appropriate topics and focuses, but are not mentioned. Additionally, the strategies described do not connect to the actual delivery of training to ECE staff.”

Student 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.”
- “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.”
- “Although the goal broadly references children with disabilities, the proposed data collection methods appear narrowly focused on behavioral concerns. For Deaf, DeafBlind, and Hard of Hearing children, behavioral challenges are often directly related to inadequate communication access or language deprivation. Early childhood, particularly birth through age seven, is a critical period for language development. The current goal does not clearly address how programs identify, assess, or support children with hearing loss during these foundational developmental years in Early Care programs.”

Need a student-centered goal

- “The goal should focus more on the experience of the child and family, rather than care providers, to support a direct connection of increased training having an impact of informal suspensions and expulsions in ECE.”
- “We believe this goal should be written to center the children affected, not the staff. The target should be clarified to indicate whether it is 8% of the survey respondents (1050 respondents), which would amount to 84 staff, or 8% of all ECE staff across the State, which would amount to ~3,200 staff.”
- “OMHDD has long been aware of the challenges for parents and families accessing consistent, quality, early care and education programs. The examples the plan cites surrounding requests to pick up early, altering schedules, or not being a good fit are consistent with what has been reported to us. That said, it is our vision that Minnesota’s Omstead plan be about people not provider staff. This goal, as written, does not clearly connect the training staff receive with the number of informal suspensions and expulsions this goal aims to achieve. We understand staff training and support being a necessary factor, but that does not mean that the discriminatory practices of suspending or expelling preschool and pre-K programs would diminish. Having the goal focused on the child and family, rather than the provider, would be preferable.”

Strategy ideas suggested for Education Goal 4

Respondents shared many strategy ideas to consider for Education Goal 4. These suggestions have not been vetted for scope or funding and are submitted as written.

Quotes:

Focus on communication access, not just behavior

- “Expand both implementation activities and data collection efforts to address the needs of all disability groups, including Deaf, DeafBlind, and Hard of Hearing children. Programs should have access to resources, training, and expertise that help determine whether communication barriers or language deprivation are contributing to behavioral concerns. Without addressing communication access and early language development, systems may incorrectly interpret language deprivation as behavioral problems. Early intervention and appropriate communication support are essential to healthy educational and developmental outcomes.”

Training and capacity needs

- “Quality surveys with ECFE staff on what training and issues they are struggling with and focus strategies on their needs.”
- “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.”
- “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.”
- “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.”

Funding needed

- Funds should be allocated to early childhood programs to prevent future issues.

Education Goal 5: Fewer students with disabilities will experience maltreatment at school.

Lead agency: MDE

Survey questions about Education Goal 5

The following tables show results of multiple-choice survey questions.

Do you think this is an important issue for MDE to address?

Response	Count	Percentage
Very important	18	90%
Important	1	5%
Not very important	1	5%
Not at all	0	0%
Unsure	0	0%
Total	20	100%

This measurable goal is...

Response	Count	Percentage
Too high	0	0%
Just right	5	25%
Too low	11	55%
Not sure	4	20%
Total	20	100%

Do you think reaching Education Goal 5 will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	6	28.6%
Yes, some improvement	7	33.3%
No improvement	6	28.6%
Not sure	2	9.5%
Total	21	100%

Themes from all input about Education Goal 5

General feedback about the Education Goal 5 included the need for higher goal targets,

Quotes:

Goal target too low

- “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.”
- “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.”
- “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."

- "The goal as stated implies that some level of abuse and neglect is acceptable. Given consequences of not meeting the goal (continued maltreatment of students with disabilities), the goal is far too conservative."
- "As we pointed out in our July 2022 submission to the Subcabinet, OMHDD remains concerned that the plan does not adequately seek to prevent the abuse and neglect of students with disabilities. Trying and failing to meet an aspirational goal to prevent abuse and neglect is preferable to setting predictably achievable standards. Focusing solely on incrementally reducing abuse and neglect rather than eliminating it in the goal statement, gives the unintended impression that some level of abuse and neglect is, if not acceptable, unavoidable. OMHDD rejects that premise. Additionally, the proposed goal is far too conservative in reducing the number of victims of substantiated maltreatment by only two students. As the state agency that receives and reviews these reports of students shoved, punched, kicked, neglected, subject to prone restraint, prohibited seclusion, and sexually abused, we stress that the plan must aggressively act to prevent the trauma experienced by children with disabilities who are maltreated at school, a place that should be safe. In OMHDD's review, it is not uncommon for the substantiation to be largely based on video evidence after a school employee has denied the maltreatment. We maintain concern for those reports that do not have such clear, objective evidence to support a maltreatment finding and shudder at how many more students may be subjected to abuse and neglect than can be substantiated."

More robust training needed

- "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."

Issues with measurement of this goal

- "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."
- "Why is this goal illogical, not based on clear thinking? First, this goal assumes that we have identified ALL persons subjected to maltreatment at school - and that number is 28 currently -

because the goal is to reduce by 2. What is additional maltreatment is discovered? Then the baseline doesn't represent reality and is the goal still to reduce by 2 or get back to the 2023 number? It isn't clear what the measurement should be. Second, why is the goal not zero? Come on - maltreatment is defined (or at least includes) neglect, physical abuse or sexual abuse - the correct number is zero, none - not now and not ever. Being subjected to maltreatment is first of all inhumane, but it is also illegal - our collective tolerance for maltreatment in any form should be zero - absolute zero. Why would we have a goal that says we tolerate up to 26 cases. Third - I am not a statistical expert - but I don't believe on a small sample size - you can measure a decreased percentage to .001%. Mixing absolutely values and percentages makes this confusing and conflicting."

- "We recommend the goal use the full definition of maltreatment established under the Minnesota Statutes, which states: 'Maltreatment' means any of the following acts or omissions: (1) egregious harm under subdivision 5; (2) neglect under subdivision 15; (3) physical abuse under subdivision 18; (4) sexual abuse under subdivision 20; (5) substantial child endangerment under subdivision 22; (6) threatened injury under subdivision 23; (7) mental injury under subdivision 13; and (8) maltreatment of a child in a facility."

Focus on underreporting and enforcement

- "Based on Minnesota Student Survey results, there are strong indications that maltreatment of students with IEPs is significantly underreported by hundreds of cases a year. A better goal would take this into consideration and look for ways to ensure these students are being heard and protected from harm. Additionally, this goal could create a perverse incentive to meet the goal of reducing the number of substantiated reports by slowing or stopping investigations during the 1-year target period. We consider that proceeding with this goal and its strategies as currently drafted will be to ignore hundreds of students who are experiencing maltreatment without notice or relief."
- "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.”

- “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.”
- “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.”

Strategy ideas suggested for Education Goal 5

Respondents shared many strategy ideas to consider for Education Goal 5. These suggestions have not been vetted for scope or funding and are submitted as written.

Quotes:

- “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.
 - 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.
 - 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.

- 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.
- 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.”
- “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.”
- “Qualitative surveys/ interviews with students that have experienced abused and ways they would like to be protected and able to report info safely and implement those strategies.”
- “Cameras in classrooms.”
- “Strengthen prevention, reporting, and investigation of maltreatment involving students with disabilities, including accessible reporting tools, anti-retaliation protections, culturally competent referral guides, and family education in multiple languages.”

Education Goal 6: Fewer students with disabilities will experience restrictive procedures.

Lead agency: MDE

Survey questions about Education Goal 6

The following tables show results of multiple-choice survey questions.

Do you think this is an important issue for MDE to address?

Response	Count	Percentage
Very important	15	75%
Important	3	15%
Not important	1	5%
Not at all	1	5%
Unsure	0	0%
Total	20	100%

This measurable goal is...

Response	Count	Percentage
Too high	0	0%
Just right	5	26.3%
Too low	10	52.6%
Not sure	4	21%
Total	19	100%

Do you think reaching Education Goal 6 will improve the lives of Minnesotans with disabilities?

Response	Count	Percentage
Yes, good improvement	7	36.8%
Yes, some improvement	5	26.3%
No improvement	4	21%
Not sure	3	15.8%
Total	19	100%

Themes from all input about Education Goal 6

General feedback about the Education Goal 6 included the need to address service issues, clarifying questions, and some positive feedback about the goal.

Quotes:

Focus on the root causes

- “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.”
- “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. Their is WAY too low a bar for schools.”

Focus on training

- “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-regulation, 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.”

Goal target too low

- “OMHDD is disappointed to see so low a target established. Reducing the number of students subject to use of restrictive procedures by 0.1% over a three-year period is simply not ambitious enough. This goal also fails to recognize that as of September 1, 2024, the use of seclusion is prohibited for students from birth to third grade as passed by the legislature. The impact of that most certainly will reduce the overall number of restrictive procedures without any other intervention. Failure to include that context in a draft put out for public comment at best lacks transparency and, at worst, seems disingenuous.”
- “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. Strategy ideas suggested for Education Goal 6.”
- “It would be helpful if goals included both percentages and targets, as had been discussed at Leadership Forum. For this goal, a reduction of 0.1% in the number of students subject to restrictive procedures equates to 145 fewer students. With over 300 school districts in MN, that could be achieved with less than half the districts reporting one fewer student experiencing restrictive procedures. Knowing how deeply traumatic restrictive procedures can be for students, their peers, and school staff alike, and the lingering impacts of that trauma with the potential to change the trajectory of people’s lives in both the short and long term, Minnesota should seek far more aspirational goals in its Olmstead plan. As Minnesota’s Olmstead Plan was initially developed as part of the Jensen Settlement Agreement involving the inappropriate use of restraints, it is even more incumbent upon us to hold high standards and aspirations surrounding the reduction of restrictive procedures in schools. This goal does not reflect either.”
- “The target appears to be that in the course of one year, there will be a net decrease of 145 students with disabilities who experience restrictive procedures. In addition, the target is extremely low and confined to a single year, and the percentages in the goal appear to be miscalculated, as 2,932 is 2% of 144,720. If this interpretation is incorrect, please clarify with specific numbers. Regardless, the goal as written does not appear to center on the extreme

trauma and harm these practices can cause students with disabilities, nor does it account for or address the companion issue of seclusion.”

Strategy ideas suggested for Education Goal 6

Respondents shared many strategy ideas to consider for Education Goal 6. These suggestions have not been vetted for scope or funding and are submitted as written.

Quotes:

- “Increase the amount of support staff to support the student so restrictive procedures are not necessary.”
- “Work with families to identify ways to better support the student and avoid triggers.”
- “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.”
- “Mostly satisfied. Focus on dialogue as a positive supports.”
- “MDE mentions the expansion of Positive Behavior Interventions and Supports (PBIS) to be expanded statewide. That may also be applicable here. OMHDD also questions whether the strategies are new or whether they are existing strategies being recycled for this draft. Will the publicly shared information about reducing the use of restrictive procedures encompass more than what is already available on the MDE website and provided to districts?”

Education Data Goal 1: Adolescent students with disabilities released from correctional facilities will have an opportunity to continue their education.

Lead agency: Department of Corrections (DOC)

Supporting agencies: MDE

Themes from all input about Education Data Goal 1

General feedback about the Education Data Goal 1.

Quotes:

- “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."

- "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."
- "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."
- "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."
- "Please consider adding some context about the speed of moving from data collection to goal development; otherwise, it looks like this process could take up to five years. It would also help to clarify why some goals repeat an existing law that should be implemented."

Strategy ideas suggested for Education Data Goal 1

Respondents shared many strategy ideas to consider for Education Data Goal 1. These suggestions have not been vetted for scope or funding and are submitted as written.

Quotes:

- “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.”
- “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.”
- “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.”

Education Data Goal 2: Incarcerated adults with disabilities will have access to education supports before release.

Lead agency: Department of Corrections (DOC)

Supporting agencies: MDE

Themes from all input about Education Data Goal 2

General feedback about the Education Data Goal 2.

Quotes:

- “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.”
- “What are ‘education supports?’ Like, opportunities for education? Accommodations to make education programs accessible? Help getting enrolled in ABE/GED programming?”
- “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."

Strategy ideas suggested for Education Data Goal 2

Respondents shared many strategy ideas to consider for Education Data Goal 2. These suggestions have not been vetted for scope or funding and are submitted as written.

Quotes:

- "I would add that these students need a through psych evaluations to address the reasons they were incarcerated and unable to finish school."
- "Qualitative interview with adults about their educational desires including discussing their dreams, strengths, barriers, short and long term goals and identify appropriate settings."
- "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."