

SWAN RIVER MONTESSORI CHARTER SCHOOL

School Board Meeting

Tuesday, January 21, 2025 at 2:30 p.m.

The school board will hold this meeting in person at Swan River Montessori Charter School at 503 Maple St. building.

Meeting Agenda

I. CALL TO ORDER at 503 Kitchen at Swan River Montessori Charter School by @ pm

II. ROLL CALL

- a. Board Members Present:
- b. Board Members Absent:
- c. Other Attendees:
- d. Recording Minutes :

III. REVIEW OF SRMCS MISSION AND VISION STATEMENTS

The mission of Swan River Montessori Charter School is to provide a child-centered environment for self-directed and personalized learning in a small, community-based public school with an emphasis on the natural environment.

Swan River Montessori Charter School's vision is to employ an interdisciplinary approach to education by teaching the whole child (heart, mind, and soul). The Montessori learning environment is designed to foster this whole child approach by meeting the child's inherent needs of self-discovery, creativity, independence, and competence. Swan River Montessori Charter School will create a kind, respectful environment where each child has a sense of belonging. Learning at Swan River Montessori Charter School involves the student, the student's family, the teachers, and the larger community. Swan River supports family and community participation in each child's education by utilizing and appreciating community resources and the natural world as a learning environment.

IV. MEETING AGENDA- Motion to approve meeting agenda made by , Seconded by Board Vote- All "aye", Motion carries

V. DECLARATION OF CONFLICTS-

VI. FINANCIAL REPORT

- a. December Financial Report –Motion to approve December financials made by Seconded by Board Vote- All "aye" Motion carries
- a. FY25 Enrollment Numbers as of 1.17.25
 - i. Charter School (K-6) = 167
 - ii. Children's House (EC) = 13
 - iii. Pupil Unit Actual/Budget = 167/163
- b. Review of Bills-
- c. Donations- – no donations to approve

VII. CONSENT AGENDA - Motion to approve consent agenda removing Bullying Prohibition Policy by ,
Seconded by . Board Vote- all aye, motion carries

- a. December Minutes
- b. Attendance Policy
- c. Equal Employment Policy
- d. Disability Non-Discrimination Policy
- e. Harassment and Violence Policy
- f. Review Reducing Lead in Drinking Water Technical Guide
- g. Student Disability Non-Discrimination Policy
- h. Student Journal Policy
- i. Non-Discrimination Policy
- j. SRMCS Personal Electronic Device Policy

VIII. ENVIRONMENTAL EDUCATION REPORT AS RELATED TO CONTRACTED GOAL

IX. ACADEMIC PERFORMANCE REPORT AS RELATED TO CONTRACTED GOALS –

X. DIRECTOR GOALS-

XI. TRATEGIC PLANNING & GOAL SETTING-

XII. OLD BUSINESS-

XIII. NEW BUSINESS

XIV. REVIEW OF NEXT MEETING AGENDA

- a. Date, Time & Location of next Board Meeting – **February 18, 2025 in the 503 building @ 2:30 pm**
- b. Upcoming Agenda Items

New Business

Approve School Calendar for Next Year
Confirm Auditor Contract
Review Assumptions and Preliminary Numbers for Upcoming Budget Year
Fixed Assets Policy
Nepotism Policy
Public and Private Personnel Data

XV. MOTION TO ADJOURN by at PM , Seconded by . Board Vote- all in favor ‘ aye’ , motion carries

SWAN RIVER MONTESSORI CHARTER SCHOOL

School Board Meeting

Tuesday, December 17, 2024 at 2:30 p.m.

The school board will hold this meeting in person at Swan River Montessori Charter School at 503 Maple St. building.

Meeting Agenda

I. CALL TO ORDER at 503 Kitchen at Swan River Montessori Charter School by JE @ 2:33 pm

II. ROLL CALL

- a. Board Members Present: AS, JH, NP, RF, CB, JE
- b. Board Members Absent: AJ
- c. Other Attendees: Annette Vemuri
- d. Recording Minutes : Annette Vemuri

III. REVIEW OF SRMCS MISSION AND VISION STATEMENTS

The mission of Swan River Montessori Charter School is to provide a child-centered environment for self-directed and personalized learning in a small, community-based public school with an emphasis on the natural environment.

Swan River Montessori Charter School's vision is to employ an interdisciplinary approach to education by teaching the whole child (heart, mind, and soul). The Montessori learning environment is designed to foster this whole child approach by meeting the child's inherent needs of self-discovery, creativity, independence, and competence. Swan River Montessori Charter School will create a kind, respectful environment where each child has a sense of belonging. Learning at Swan River Montessori Charter School involves the student, the student's family, the teachers, and the larger community. Swan River supports family and community participation in each child's education by utilizing and appreciating community resources and the natural world as a learning environment.

IV. MEETING AGENDA- Motion to approve meeting agenda made by AS, Seconded by JH Board Vote- All "aye", Motion carries

V. DECLARATION OF CONFLICTS-

VI. FINANCIAL REPORT

- a. November Financial Report –Motion to approve November financials made by NP Seconded by RF Board Vote- All "aye" Motion carries
- a. FY25 Enrollment Numbers as of 12.17.24
 - i. Charter School (K-6) = 166
 - ii. Children's House (EC) = 13
 - iii. Pupil Unit Actual/Budget = 166/163
- b. Review of Bills-
- c. Donations- Thrivent – no donations to approve

VII. CONSENT AGENDA - Motion to approve consent agenda removing Bullying Prohibition Policy by JH,
Seconded by RF . Board Vote- all aye, motion carries

- a. November Minutes
- b. Use & Rental of School Facilities Policy
- c. Caseload for Special Education Policy
- d. Bullying Prohibition Policy
- e. Mid-Year Student Enrollment Policy
- f. Extended Care for Staff Children Policy

I. ENVIRONMENTAL EDUCATION REPORT AS RELATED TO CONTRACTED GOALS

II. ACADEMIC PERFORMANCE REPORT AS RELATED TO CONTRACTED GOALS -

III. DIRECTOR GOALS-

IV. STRATEGIC PLANNING & GOAL SETTING-

V. OLD BUSINESS-

VI. NEW BUSINESS

- a. Bullying Prohibition Policy – Motion to approve the Bullying Prohibition Policy with the addition of cyber in the definition under section 3. RF moves, CB seconds, all favor say aye. Motion carries
- b. Review Tuition & Extended Care Rates for Next School Year. CB motions to raise tuition \$50 per month to a total of \$775 a month. RF seconds. Motion approves. CB moves keep \$5 in morning and \$15 in the afternoon with drop-in rate is \$20.00 seconded by RF. Motion carries.
- c. Form committee to look at policies – Annette will contact a lawyer to discuss reviewing policies. Committee will meet on January 21st in 503 kitchen from 1 to 2:30.

VII. REVIEW OF NEXT MEETING AGENDA

- a. Date, Time & Location of next Board Meeting – **Tuesday January 21, 2024 in the 503 building @ 2:30 pm**
- b. Upcoming Agenda Items

New Business

- a. Attendance Policy
- b. Equal Employment Policy

- c. Disability Non-Discrimination Policy
- d. Harassment and Violence Policy
- e. Student Disability Non-Discrimination Policy

VIII. MOTION TO ADJOURN by CB at 3:43 PM, Seconded by ABS. Board Vote- all in favor ‘aye’, motion carries



Swan River Montessori Monthly Financials

DECEMBER 2024

EdFinMN

FINANCE AND ACCOUNTING SERVICES FOR CHARTER
SCHOOL AND EDUCATION SUPPORT ORGANIZATIONS

Swan River Montessori Financial Highlights

DECEMBER 2024

Balance Sheet:

The School's balance sheet reflects the school's liquid assets and liabilities. The primary focus of the balance sheet is the cash balance and any material liabilities. Additionally, attention should be paid to the amount of the YTD state hold back. The highlights from the balance sheet are:

- \$787,022 Cash balance at end of the month
- \$142,757 State receivables which represents an initial estimate for the beginning of the accrual for the FY24 hold back
- \$16,630 State receivables which represents the remaining amount due to the school from the state 10% holdback of the prior school year
- \$84,824 Salary and benefits payables estimated. This is for summer salaries as of month-end.

Income Statement

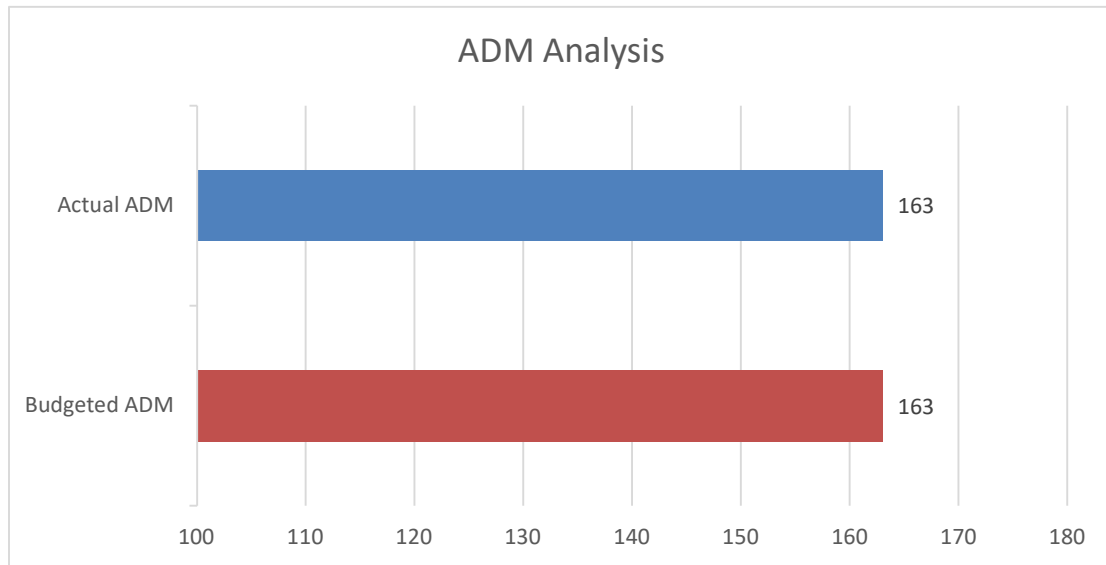
The focus of the school's income statement is to monitor the ongoing revenues and expenses of the various programs. A monthly review of the actual spent vs. budget as well as taking into consideration the percentage of the fiscal year completed is imperative. Yet, also understanding how each individual line-item functions will help the overall analysis. The highlights from the income statement are:

- Adopted Budget: 163 ADM
- Working Budget: 163 ADM
- Actual ADM 163
- 50% Percent of the fiscal year completed
- 47% YTD revenue as a percent of budget based on the working projection.
- 43% YTD expenses as a percent of budget based on the working projection.
- \$794,447 Projected year end fund balance
- 31% Projected ending fund balance as a % of expense budget

Cash Flow:

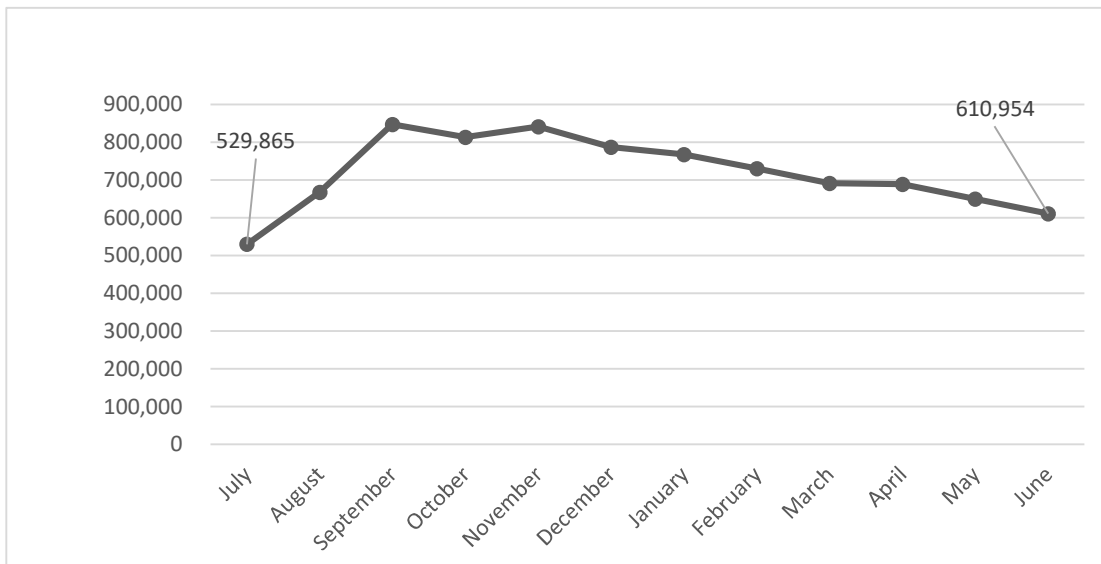
- Estimated cash balance as of June 30, 2025
\$ 610,954

Enrollment/ADM's



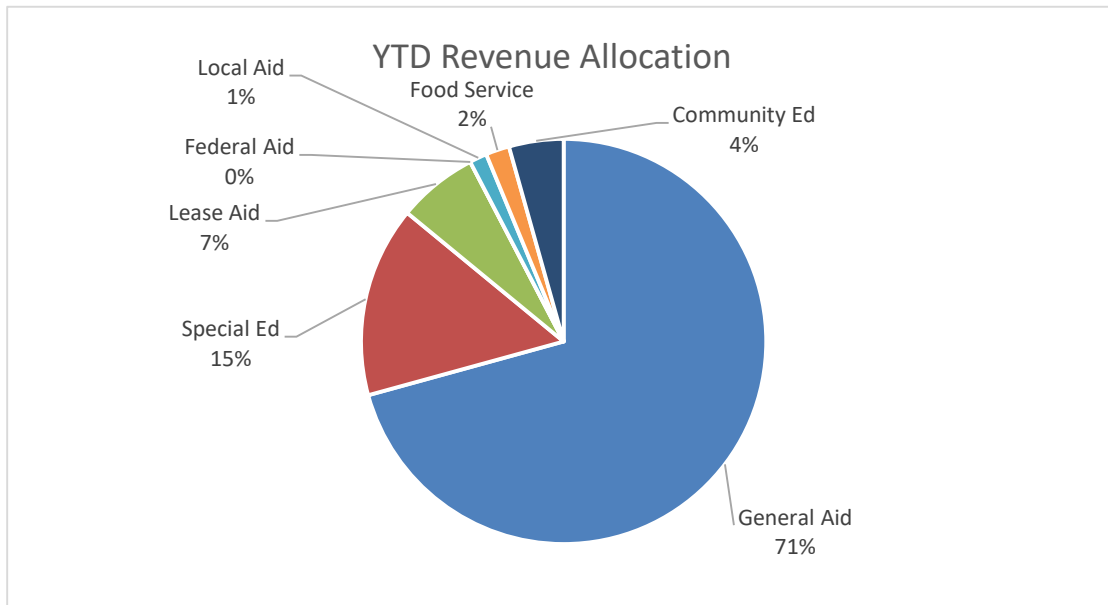
Monitoring the school's budgeted ADM vs. the actual ADM is one of the most important analytical revenue reviews. Variance from the budgeted ADM must be reviewed and understood.

Cash Flow Projection



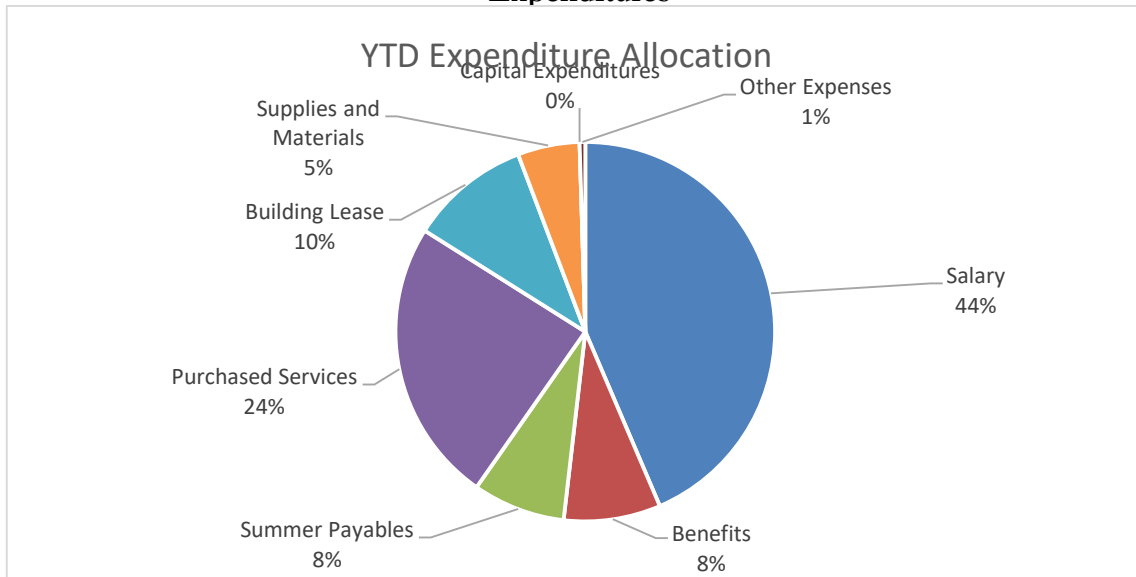
Swan River's cash balance is expected to decrease slightly during fiscal 2024.

Revenue



The graph above reflects the revenue allocation the school has received from all revenue sources to date.

Expenditures



The graph above reflects the current year to date expenditure allocation across the school's major budget categories. This depiction helps identify how the school has spent their funds thus far.

Swan River Montessori Charter School
Balance Sheet
As of December 31, 2024

Assets		As of Month-End
Cash		787,022
MDE Receivable - Current year estimate		142,757
MDE Receivable - Prior year		16,630
Prepays		6,598
Total Assets	\$	953,007
Liabilities		
Salary and Benefits Payable	\$	84,824
Total Liabilities	\$	84,824
Fund Balance		
Beginning - Audited	\$	737,684
Change in Fund Balance		130,499
Ending- Projected	\$	868,183
Total Liabilities and Fund Balance	\$	953,007

Current year based on estimated, primarily for ADM numbers.

Swan River Montessori Charter School
Income Statement Summary
As of December 31, 2024

Revenue	Adopted Budget - 163ADM/ 163PU	Working Forecast - 163ADM/ 163PU	Monthly Activity	Year to Date	% of Budget
State Aids	\$ 2,474,328	\$ 2,474,328	\$ 172,561	\$ 1,169,406	47.3%
Federal Aids	48,668	48,668	5,815	15,904	32.7%
Local	103,725	103,725	14,589	48,012	46.3%
Total	\$ 2,642,819	\$ 2,642,819	\$ 192,965	\$ 1,233,322	46.7%
Expense					
Salary	\$ 1,207,336	\$ 1,207,336	\$ 112,803	\$ 480,258	39.8%
Benefits	275,914	275,914	19,686	91,244	33.1%
Summer Payables	-	-	-	86,950	NA
Purchased Services	579,909	579,909	81,824	267,420	46.1%
Supplies and Materials	231,368	231,368	15,577	58,461	25.3%
Capital Expenditures	253,380	253,380	16,532	113,353	44.7%
Other Expenses	38,149	38,149	0	5,138	13.5%
Total	\$ 2,586,056	\$ 2,586,056	\$ 246,422	\$ 1,102,823	42.6%
Change in Fund Balance	\$ 56,763	\$ 56,763	\$ (53,457)	\$ 130,499	
Beginning Fund Balance	737,684	737,684	737,684	737,684	
Ending- Projected	\$ 794,447	\$ 794,447	\$ 684,227	\$ 868,183	
 FB as a % of Exp	 31%	 31%			

Fund	Beginning Fund Balance 7/1/2024 - Audited	Projected Revenues	Projected Expenditures	Projected Fund Balance 6/30/2025	Profit (Loss) CY
General Fund 1	699,039	2,356,762	2,311,038	744,763	45,724
Food Service Fund 2	3,333	153,232	152,898	3,667	334
Community Service Fund 4	35,312	132,825	122,120	46,017	10,705
	737,684	2,642,819	2,586,056	794,447	56,763

Swan River Montessori Charter School
Detail Revenue
As of December 31, 2024

50% Year Complete

	Adopted Budget - 163ADM/ 163PU	Working Forecast - 163ADM/ 163PU	Monthly Activity	Year to Date	% of Budget
General Fund					
State Aid					
General Aid	\$ 1,298,245	\$ 1,298,245	\$ 153,529	\$ 678,675	52%
Special Ed	690,063	690,063	-	176,539	26%
Lease Aid	214,182	214,182	-	74,504	35%
Literacy Incentive Aid	17,793	17,793	4,021	10,052	56.5%
Hourly Worker Unemployment	29,663	29,663	-	33,817	114.0%
School Library Aid	19,944	19,944	-	12,530	62.8%
Student Support Aid	19,304	19,304	-	6,000	31.1%
READ Act Literacy Aid	-	-	1,941	3,882	N/A
READ Act Training Aid	-	-	-	5,842	N/A
State Aid Receivables*	-	-	-	142,757	N/A
Total State Aid	\$ 2,289,194	\$ 2,289,194	\$ 159,491	\$ 1,144,597	50%
Federal Aid					
Title I	\$ 17,644	\$ 17,644	\$ -	\$ -	0%
Special Ed	31,024	31,024	-	-	0%
Total Federal Aid	\$ 48,668	\$ 48,668	\$ -	\$ -	0%
Local Aid and Donation					
Interest	\$ 500	\$ 500	\$ 732	\$ 3,433	687%
Miscellaneous	8,000	8,000	4,406	8,556	106.9%
Donations and Other	10,000	10,000	-	40	0%
Fees for Services	400	400	830	4,275	1069%
Total Local and Donation	\$ 18,900	\$ 18,900	\$ 5,967	\$ 16,304	86%
Total General Fund Revenue	\$ 2,356,762	\$ 2,356,762	\$ 165,458	\$ 1,160,901	49%
Food Service Fund					
State Revenue	\$ 137,134	\$ 137,134	\$ 7,860	\$ 5,959	4%
Federal Revenue	-	-	5,815	15,904	N/A
Food Sales	-	-	4	16	N/A
Transfer from General	16,098	16,098	-	-	0%
Total Food Service Revenue	\$ 153,232	\$ 153,232	\$ 13,679	\$ 21,878	14%
Community Service Fund					
Before/After School Care	\$ 48,000	\$ 48,000	\$ 5,210	\$ 18,850	39%
Children's House Tuition	84,825	84,825	8,618	31,693	37%
Total Community Service Revenue	\$ 132,825	\$ 132,825	\$ 13,828	\$ 50,543	38%
Total Revenue- All Funds	\$ 2,642,819	\$ 2,642,819	\$ 192,965	\$ 1,233,322	47%

Swan River Montessori Charter School
Detail Expense
As of December 31, 2024

FYTD: 50%

	Adopted Budget - 163ADM/ 163PU	Working Forecast - 163ADM/ 163PU	Monthly Activity	Year to Date	% of Budget
Admin and Operations					
100 Salaries	\$ 124,009	\$ 124,009	\$ 10,767	\$ 58,529	47%
200 Benefits	30,727	30,727	2,015	13,898	45%
305 Contracted Services	138,933	138,933	15,713	90,106	65%
320 Communication	6,026	6,026	482	2,429	40%
329 Postage	904	904	-	148	16%
330 Utilities	37,316	37,316	2,354	16,201	43%
340 Insurance	24,411	24,411	-	9,580	39%
350 Repairs & Maintenance	2,040	2,040	-	-	0%
366 Conferences/Professional Development	5,250	5,250	-	-	0%
401 General Supplies	24,102	24,102	2,706	10,886	45%
405 Purchased Software (405/406)	510	510	-	21	4%
490 Food	460	460	-	-	0%
570 Building Lease	253,380	253,380	16,532	113,353	45%
820 Dues & Memberships	20,948	20,948	-	3,740	18%
910 Transfers to Other Funds	16,098	16,098	-	-	0%
Total Admin and Operations	\$ 685,114	\$ 685,114	\$ 50,569	\$ 318,891	47%
Instructional Support and Services					
100 Salaries	\$ 615,585	\$ 615,585	\$ 54,817	\$ 218,415	35%
200 Benefits	152,528	152,528	10,377	46,429	30%
1XX/2XX Summer Payable	-	-	-	53,019	NA
305 Contracted Services	-	-	16,049	15,965	0%
360 Transportation - Field Trips	12,555	12,555	-	4,253	34%
366 Conferences/Professional Development	6,300	6,300	-	1,707	27%
369 Field Trips and Registration	-	-	195	1,248	0%
401 General Supplies	13,948	13,948	634	8,773	63%
405 Purchased Software (405/406)	-	-	-	677	0%
430 Instructional Supplies	29,756	29,756	425	2,306	8%
455 Technology Supplies	-	-	-	180	0%
461 Standardized Tests	2,625	2,625	-	-	0%
490 Food	-	-	8	(9)	0%
820 Dues & Memberships	1,103	1,103	0	1,398	127%
Total Instructional Support and Services	\$ 834,400	\$ 834,400	\$ 82,504	\$ 354,360	42%

Swan River Montessori Charter School
Detail Expense
As of December 31, 2024

FYTD: 50%

	Adopted Budget - 163ADM/ 163PU	Working Forecast - 163ADM/ 163PU	Monthly Activity	Year to Date	% of Budget
Special Education					
100 Salaries	\$ 361,907	\$ 361,907	\$ 41,197	\$ 177,650	49%
200 Benefits	89,672	89,672	6,849	29,204	33%
1XX/2XX Summer Payable	-	-	-	33,931	NA
305 Contracted Services	7,166	7,166	-	-	0%
366 Conferences/Professional Development	1,130	1,130	342	626	55%
394 Payments to Other Agencies	316,654	316,654	45,789	121,188	38%
401 General Supplies	4,599	4,599	331	1,522	33%
405 Purchased Software	1,725	1,725	11	1,875	109%
433 Instructional Supplies- Ind	8,671	8,671	-	-	0%
Total Special Education	\$ 791,524	\$ 791,524	\$ 94,519	\$ 365,995	46%
Total General Fund Expenditures	\$ 2,311,038	\$ 2,311,038	\$ 227,592	\$ 1,039,246	45%
Food Service Fund					
100 Salaries	\$ 6,569	\$ 6,569	\$ 1,399	\$ 5,252	80%
200 Benefits	2,987	2,987	444	1,713	57%
401 General Supplies	-	-	667	3,270	0%
490 Food	143,342	143,342	9,873	27,693	19%
820 Dues & Memberships	-	-	700	700	0%
Total Food Service	\$ 152,898	\$ 152,898	\$ 13,082	\$ 38,627	25%
Community Ed Fund					
100 Salaries	\$ 99,266	\$ 99,266	\$ 4,624	\$ 20,412	21%
200 Benefits	20,992	20,992	900	3,970	19%
394 Field Trips	232	232	-	-	0%
401 General Supplies	1,418	1,418	224	518	37%
430 Instructional Supplies	-	-	-	49	0%
820 Dues & Memberships	212	212	-	-	0%
Total Community Ed	122,120	122,120	5,747	24,949	20%
Total Expense- All Funds	\$ 2,586,056	\$ 2,586,056	\$ 246,422	\$ 1,102,823	43%

Swan River Montessori Charter School
CashFlow
As of December 31, 2024

6 Months Remaining

Cash Receipts	Budget	Monthly Activity	Year to Date	January	February
State Aids- Current Year	\$ 2,289,194	\$ 159,491	\$ 1,001,840	\$ 159,412	\$ 159,412
State Aids- Prior Year	16,630	-	-	7,416	1,817
Federal - Current Year	48,668	-	-	12,167	-
Local	151,725	19,795	66,846	14,146	14,146
Food Service	153,232	13,679	21,878	20,798	20,798
Total Inflows	\$ 2,659,449	\$ 192,965	\$ 1,090,564	\$ 213,939	\$ 196,173
Expense					
Salary	\$ 1,207,336	\$ 112,803	\$ 480,258	\$ 100,611	\$ 100,611
Benefits	275,914	19,686	91,244	22,993	22,993
Purchased Services	579,909	81,824	267,420	52,082	52,082
Supplies and Materials	231,368	15,577	58,461	28,818	28,818
Capital Expenditures	253,380	16,532	113,353	23,338	23,338
Other Expenses	38,149	0	5,138	5,502	5,502
Accounts Payable	-	-	-	-	-
Total Outflows	\$ 2,586,056	\$ 246,422	\$ 1,015,873	\$ 233,343	\$ 233,343
Change in Cash				\$ (19,404)	\$ (37,170)
Beginning				\$ 787,022	\$ 767,618
Line of Credit				\$ -	\$ -
Ending- Projected				\$ 767,618	\$ 730,448

Swan River Montessori Charter School
CashFlow
As of December 31, 2024

6 Months Remaining

Cash Receipts	Budget	Monthly Activity	Year to Date	March	April	May	June	Total	Budget	Remaining
State Aids- Current Year	\$ 2,289,194	\$ 159,491	\$ 1,001,840	\$ 159,412	\$ 159,412	\$ 159,412	\$ 159,412	\$ 1,958,312	\$ 2,289,194	\$ 330,882
State Aids- Prior Year	16,630	-	-	-	24,288	-	-	33,521	16,630	-
Federal - Current Year	48,668	-	-	-	12,167	-	-	24,334	48,668	24,334
Local	151,725	19,795	66,846	14,146	14,146	14,146	14,146	151,725	151,725	-
Food Service	153,232	13,679	21,878	20,798	20,798	20,798	20,798	146,664	153,232	6,568
Total Inflows	\$ 2,659,449	\$ 192,965	\$ 1,090,564	\$ 194,356	\$ 230,811	\$ 194,356	\$ 194,356	\$ 2,314,556	\$ 2,659,449	\$ 361,784
Expense										
Salary	\$ 1,207,336	\$ 112,803	\$ 480,258	\$ 100,611	\$ 100,611	\$ 100,611	\$ 100,611	\$ 1,083,926	\$ 1,207,336	\$ 123,410
Benefits	275,914	19,686	91,244	22,993	22,993	22,993	22,993	229,201	275,914	46,713
Purchased Services	579,909	81,824	267,420	52,082	52,082	52,082	52,082	579,909	579,909	-
Supplies and Materials	231,368	15,577	58,461	28,818	28,818	28,818	28,818	231,368	231,368	-
Capital Expenditures	253,380	16,532	113,353	23,338	23,338	23,338	23,338	253,380	253,380	-
Other Expenses	38,149	0	5,138	5,502	5,502	5,502	5,502	38,149	38,149	-
Accounts Payable	-	-	-	-	-	-	-	-	-	-
Total Outflows	\$ 2,586,056	\$ 246,422	\$ 1,015,873	\$ 233,343	\$ 233,343	\$ 233,343	\$ 233,343	\$ 2,415,933	\$ 2,586,056	\$ 170,123
Change in Cash	\$ (38,987)	\$ (2,532)	\$ (38,987)	\$ (38,987)	\$ (38,987)	\$ (38,987)	\$ (38,987)	\$ (101,376)		
Beginning	\$ 730,448	\$ 691,460	\$ 688,928	\$ 649,941					Days Cash on Hand	
Line of Credit	\$ -	\$ -	\$ -	\$ -					92	
Ending- Projected	\$ 691,460	\$ 688,928	\$ 649,941	\$ 610,954						

NOTES TO THE FINANCIAL STATEMENTS

DECEMBER 2024

- The financials statements are drafted on an accrual basis of accounting.
 - The financial statements are drafted based on information received from the school's leadership.
 - The numbers are subject to change based on timing of information received from the school.
 - The school's budget is based on full accrual projections as of the end of the fiscal year.
 - This report is unaudited and is prepared for internal use only.
-



EdFinMN | 1400 Van Buren St. NE #200 | Minneapolis | MN | 55413
| www.edfinmn.org | info@edfinmn.org

Bank	Check No	Code	Rcd	Vendor	Pmt/Void Date	Pmt Type	
SHBC	1001			PERA		Wire	
				B 01 215 007			\$3,379.08
PO#:	Voucher #:	13760	Invoice	Invoice No: S2025100	12/5/2024	Paid Amt:	\$3,379.08
						Check Amount:	\$3,379.08
SHBC	1002			TRA		Wire	
				B 01 215 006			\$5,349.03
PO#:	Voucher #:	13761	Invoice	Invoice No: S2025100	12/5/2024	Paid Amt:	\$5,349.03
						Check Amount:	\$5,349.03
SHBC	1566			IRS		Wire	
				B 01 215 002			\$10,732.60
PO#:	Voucher #:	13762	Invoice	Invoice No: S2025100	12/5/2024	Paid Amt:	\$10,732.60
						Check Amount:	\$10,732.60
SHBC	1639			TSYS		Wire	
				E 01 005 110 000 305			\$150.23
PO#:	Voucher #:	13820	Invoice	Invoice No: DT120224	12/5/2024	Paid Amt:	\$150.23
						Check Amount:	\$150.23
SHBC	1660			Medsurety LLC		Wire	
				E 01 005 110 000 305			\$30.00
PO#:	Voucher #:	13823	Invoice	Invoice No: 37223	12/5/2024	Paid Amt:	\$30.00
						Check Amount:	\$30.00
SHBC	1567			MN Dept. Revenue		Wire	
				B 01 215 003			\$1,675.32
PO#:	Voucher #:	13759	Invoice	Invoice No: S2025100	12/6/2024	Paid Amt:	\$1,675.32
						Check Amount:	\$1,675.32
SHBC	1616			MedSurety		Wire	
				B 01 215 016			\$575.01
PO#:	Voucher #:	13758	Invoice	Invoice No: S2025100	12/6/2024	Paid Amt:	\$575.01
						Check Amount:	\$575.01
SHBC	1050			SRCS Building Co		Wire	
				E 01 005 850 000 348 570			\$16,531.67
PO#:	Voucher #:	13826	Invoice	Invoice No: DT121324	12/13/2024	Paid Amt:	\$16,531.67
						Check Amount:	\$16,531.67
SHBC	1054			Xcel Energy		Wire	
				E 01 005 810 000 330			\$1,230.54
PO#:	Voucher #:	13827	Invoice	Invoice No: 902765353	12/13/2024	Paid Amt:	\$1,230.54
						Check Amount:	\$1,230.54

Bank	Check No	Code	Rcd	Vendor	Pmt/Void Date	Pmt Type	
SHBC	1001			PERA		Wire	
		B 01	215	007			\$3,336.31
PO#:		Voucher #:	13781	Invoice	12/13/2024	Paid Amt:	\$3,336.31
						Check Amount:	\$3,336.31
SHBC	1002			TRA		Wire	
		B 01	215	006			\$5,349.03
PO#:		Voucher #:	13782	Invoice	12/13/2024	Paid Amt:	\$5,349.03
						Check Amount:	\$5,349.03
SHBC	1566			IRS		Wire	
		B 01	215	002			\$10,635.45
PO#:		Voucher #:	13783	Invoice	12/13/2024	Paid Amt:	\$10,635.45
						Check Amount:	\$10,635.45
SHBC	1616			MedSurety		Wire	
		B 01	215	016			\$574.77
PO#:		Voucher #:	13779	Invoice	12/23/2024	Paid Amt:	\$574.77
						Check Amount:	\$574.77
SHBC	1567			MN Dept. Revenue		Wire	
		B 01	215	003			\$1,660.04
PO#:		Voucher #:	13780	Invoice	12/23/2024	Paid Amt:	\$1,660.04
						Check Amount:	\$1,660.04
SHBC	1530			Sherburne State Bank		Wire	
		R 04	005	505 007 000 040			\$950.00
PO#:		Voucher #:	13833	Invoice	12/31/2024	Paid Amt:	\$950.00
						Check Amount:	\$950.00
SHBC	1530			Sherburne State Bank		Wire	
		E 01	005	110 000 000 305			\$10.00
PO#:		Voucher #:	13834	Invoice	12/31/2024	Paid Amt:	\$10.00
						Check Amount:	\$10.00
SHBC	1184			US Bank - Credit Card		Wire	
		E 01	005	110 000 000 305			\$51.95
		E 01	005	110 000 000 320			\$481.93
		E 01	005	110 000 000 401			\$24.24
		E 01	005	720 000 000 401			\$90.08
		E 01	005	810 000 000 401			\$39.88
		E 01	010	203 000 000 220			\$472.89
		E 01	010	203 000 000 369			\$195.00

Bank	Check No	Code	Rcd	Vendor	Pmt/Void Date	Pmt Type
SHBC	1184	US Bank - Credit Card				Wire
		E 01	010	203 000 000 401	Classroom Supplies	\$528.17
		E 01	010	420 000 419 401	SpEd Supplies	\$101.09
		E 01	010	420 000 419 405	SpEd Apps	\$10.72
		E 01	010	420 000 419 466	SpEd Ipad	\$229.99
		E 02	005	770 000 701 490	Lunch	\$288.56
		E 02	005	770 000 705 490	Breakfast	\$96.91
		E 04	005	505 000 000 401	Extended Care Supplies	\$223.58
PO#:	Voucher #:	13836	Invoice	Invoice No: DT121024	12/10/2024	Paid Amt: \$2,834.99 Check Amount: \$2,834.99
SHBC	1053	City of Monticello				Wire
		E 01	005	810 000 000 330	Water & Sewer-503 Maple St- Oct 2024	\$80.92
PO#:	Voucher #:	13821	Invoice	Invoice No: DT120124	12/2/2024	Paid Amt: \$80.92
		E 01	005	810 000 000 330	Water & Sewer- 500 Maple St -Oct 2024	\$230.28
PO#:	Voucher #:	13822	Invoice	Invoice No: DT110524	12/2/2024	Paid Amt: \$230.28 Check Amount: \$311.20
SHBC	1052	Centerpoint Energy				Wire
		E 01	005	810 000 000 330	Gas Charges 10/11/24-11/08/24	\$69.95
PO#:	Voucher #:	13824	Invoice	Invoice No: DT111124	12/9/2024	Paid Amt: \$69.95 Check Amount: \$69.95
SHBC	1052	Centerpoint Energy				Wire
		E 01	005	810 000 000 330	Gas Charges-500 Maple St- 10/11/24-11/08/24	\$202.52
PO#:	Voucher #:	13825	Invoice	Invoice No: DT111124	12/9/2024	Paid Amt: \$202.52 Check Amount: \$202.52
SHBC	1530	Sherburne State Bank				Wire
		E 01	005	110 000 000 305	Service Charge	\$35.00
PO#:	Voucher #:	13837	Invoice	Invoice No: DT123124	12/31/2024	Paid Amt: \$35.00 Check Amount: \$35.00
SHBC	18401 1204	Adam's Pest Control, Inc.				Check
		E 01	005	810 000 000 305	Prevention Plus	\$85.00
PO#:	Voucher #:	13772	Invoice	Invoice No: 4026573	12/18/2024	Paid Amt: \$85.00 Check Amount: \$85.00
SHBC	18402 1491	All Ways Heating & Air Conditioning, Inc.				Check
		E 01	005	810 000 000 305	AC Repair	\$975.00
PO#:	Voucher #:	13771	Invoice	Invoice No: 9240	12/18/2024	Paid Amt: \$975.00 Check Amount: \$975.00

Bank	Check No	Code	Rcd	Vendor	Pmt/Void Date	Pmt Type	
SHBC	18403	1391		Amy Jensen		Check	
			E 01	010 203 000 430	Intrustional Supplies	\$122.91	
PO#:	Voucher #:	13796	Invoice	Invoice No: DT120424	12/18/2024	Paid Amt:	\$122.91
		E 01	010 203 000 430	Reimbursement- Instructional Supplies		\$16.44	
		E 01	010 203 000 430	Reimbursement- Supplies		\$17.96	
PO#:	Voucher #:	13797	Invoice	Invoice No: DT120424	12/18/2024	Paid Amt:	\$34.40
						Check Amount:	\$157.31
SHBC	18404	1222		Blue Cross/Blue Shield of MN		Check	
			B 01	215 009	Insurance Premiums-Vision Nov 24	\$74.14	
PO#:	Voucher #:	13774	Invoice	Invoice No: 241127419867	12/18/2024	Paid Amt:	\$74.14
						Check Amount:	\$74.14
SHBC	18405	1222		Blue Cross/Blue Shield of MN		Check	
			B 01	215 015	Insurance Premiums-Dental Jan 2024	\$164.00	
PO#:	Voucher #:	13773	Invoice	Invoice No: 241202438874	12/18/2024	Paid Amt:	\$164.00
						Check Amount:	\$164.00
SHBC	18406	1045		CMERDC		Check	
			E 01	005 110 000 465	Copier Base Rate/Usage 11/01/24-11/30/24	\$248.76	
PO#:	Voucher #:	13777	Invoice	Invoice No: 56356	12/18/2024	Paid Amt:	\$248.76
						Check Amount:	\$248.76
SHBC	18407	1612		Colonial Life		Check	
			B 01	215 015	Supplemental Benefits -Nov 2024	\$101.10	
PO#:	Voucher #:	13776	Invoice	Invoice No: 5714381-1101764	12/18/2024	Paid Amt:	\$101.10
						Check Amount:	\$101.10
SHBC	18408	1581		Countryside Delivery		Check	
			E 02	005 770 000 701 495	Milk Delivery -Nov 2024	\$736.50	
PO#:	Voucher #:	13775	Invoice	Invoice No: DT110124	12/18/2024	Paid Amt:	\$736.50
						Check Amount:	\$736.50
SHBC	18409	1482		Designs for Learning INC		Check	
			E 01	010 404 000 740 394	DAPE Services T. Anderson 09/16/24-09/30/24	\$971.25	
			E 01	010 420 000 740 394	SpEd Social Worker 09/16/24-09/30/24 49.5h @	\$5,197.50	
			E 01	005 740 000 000 305	Gen Ed Social Worker 09/16/24-06/30/24 65h @	\$6,825.00	
			E 01	010 203 000 000 305	School Psych 09/16/24-09/30/24	\$220.00	
			E 01	010 411 000 372 394	ASD Services 09/16/24-09/3024 R Nooney 2h @	\$210.00	
			E 01	010 411 000 372 394	ASD Services 09/16/24-09/3024 R Nooney 2h @	(\$210.00)	
			E 01	010 411 000 740 394	ASD Services 09/16/24-09/3024 R Nooney 2h @	\$210.00	
			E 01	005 740 000 000 305	Gen Ed Social Worker 09/16/24-06/30/24 65h @	(\$6,825.00)	

Bank	Check No	Code	Rcd	Vendor	Pmt/Void Date	Pmt Type	
SHBC	18409	1482		Designs for Learning INC		Check	
			E 01	010 710 000 373 377	Gen Ed Social Worker 09/16/24-09/30/24 65h @		\$6,825.00
PO#:	Voucher #:	13784	Invoice	Invoice No: 20240930155	12/18/2024	Paid Amt:	\$13,423.75
		E 01	010 420 000 419 303	SpEd Director Q2 FY25			\$18,000.00
PO#:	Voucher #:	13785	Invoice	Invoice No: 25-0373	12/18/2024	Paid Amt:	\$18,000.00
						Check Amount:	\$31,423.75
SHBC	18410	1636		EdFinMN		Check	
			E 01	005 110 000 000 305	Accounting/Consulting Fees -Dec 2024		\$4,500.00
PO#:	Voucher #:	13778	Invoice	Invoice No: 2201	12/18/2024	Paid Amt:	\$4,500.00
						Check Amount:	\$4,500.00
SHBC	18412	1245		Innovative Office Solutions		Check	
			E 01	005 810 000 000 401	Facility Supplies-Salt		\$119.94
PO#:	Voucher #:	13786	Invoice	Invoice No: IN4709516	12/18/2024	Paid Amt:	\$119.94
						Check Amount:	\$119.94
SHBC	18413	1693		Larkin Electronics		Check	
			E 01	005 108 000 000 305	Calibration Checkup		\$305.00
PO#:	Voucher #:	13806	Invoice	Invoice No: DT111224	12/18/2024	Paid Amt:	\$305.00
						Check Amount:	\$305.00
SHBC	18414	1549		Loffler Companies, INC		Check	
			E 01	005 110 000 000 465	Copier - computer service12/01/24-12/31/24		\$149.50
PO#:	Voucher #:	13787	Invoice	Invoice No: 4879580	12/18/2024	Paid Amt:	\$149.50
		E 01	005 110 000 000 465	Copier - computer service 07/01/24-07/31/24			\$149.50
PO#:	Voucher #:	13800	Invoice	Invoice No: 4739453	12/18/2024	Paid Amt:	\$149.50
		E 01	005 110 000 000 465	Copier - computer service 09/01/24-09/30/24			\$149.50
PO#:	Voucher #:	13801	Invoice	Invoice No: 4794243	12/18/2024	Paid Amt:	\$149.50
		E 01	005 110 000 000 305	Finance Fee- 09/30/24			\$2.24
PO#:	Voucher #:	13803	Invoice	Invoice No: 4818857	12/18/2024	Paid Amt:	\$2.24
		E 01	005 810 000 000 305	Finance Fee- 10/31/24			\$2.24
PO#:	Voucher #:	13804	Invoice	Invoice No: 4848379	12/18/2024	Paid Amt:	\$2.24
		E 01	005 810 000 000 305	Finance Fee-08/30/24			\$2.24
PO#:	Voucher #:	13802	Invoice	Invoice No: 4790489	12/18/2024	Paid Amt:	\$2.24
		E 01	005 110 000 000 305	Finance Fee- 11/27/24			\$4.48
PO#:	Voucher #:	13805	Invoice	Invoice No: 4874806	12/18/2024	Paid Amt:	\$4.48
						Check Amount:	\$459.70

Bank	Check No	Code	Rcd	Vendor	Pmt/Void Date	Pmt Type
SHBC	18415	1633		Patty Barnes		Check
			E 01	010 203 000 000 490	Reimbursement- Classroom Snacks	\$7.75
	PO#:	Voucher #:	13799	Invoice	Invoice No: DT12/04/24 12/18/2024	Paid Amt: \$7.75 Check Amount: \$7.75
SHBC	18416	1690		Perfection Plus, Inc		Check
			E 01	005 810 000 000 305	Janitorial Service Dec 2024	\$4,200.00
	PO#:	Voucher #:	13788	Invoice	Invoice No: 315699 12/18/2024	Paid Amt: \$4,200.00 Check Amount: \$4,200.00
SHBC	18417	1258		Premier Kitchen, Inc.		Check
			E 02	005 770 000 705 490	Breakfast 11/16/24-11/30/24	\$1,075.00
			E 02	005 770 000 701 490	Lunch 11/16/24-11/30/24	\$2,205.04
PO#:			R 02	005 770 000 701 474	Commodity Credit	(\$300.00)
	Voucher #:		13790	Invoice	Invoice No: 38844 12/18/2024	Paid Amt: \$2,980.04
			E 02	005 770 000 701 490	Lunch 11/01/24-11/15/24	\$3,814.96
PO#:			E 02	005 770 000 705 490	Breakfats 11/01/24-11/15/24	\$2,392.50
			E 02	005 770 000 701 401	Food Supplies	\$130.00
			E 02	005 770 000 701 491	Commodity Credit 11/01/24-11/15/24	(\$200.00)
	Voucher #:		13789	Invoice	Invoice No: 38754 12/18/2024	Paid Amt: \$6,137.46 Check Amount: \$9,117.50
SHBC	18418	1585		Scholastic INC		Check
			E 01	010 203 000 000 430	Standard Supply Center	\$267.56
	PO#:	Voucher #:	13792	Invoice	Invoice No: M7477284 9 12/18/2024	Paid Amt: \$267.56 Check Amount: \$267.56
SHBC	18420	1680		Standard Supply Center		Check
			E 01	005 110 000 000 401	Toner	\$1,563.41
	PO#:	Voucher #:	13791	Invoice	Invoice No: 32836 12/18/2024	Paid Amt: \$1,563.41 Check Amount: \$1,563.41
SHBC	18421	1689		Cullen Host		Check
			E 01	005 810 000 000 305	Snow Removal-Jan 2024	\$1,000.00
	PO#:	Voucher #:	13807	Invoice	Invoice No: 01012025 12/18/2024	Paid Amt: \$1,000.00 Check Amount: \$1,000.00
SHBC	18422	1482		Designs for Learning INC		Check
			E 01	010 411 000 740 394	ASD Services R Nooney 1.25h @	\$131.25
			E 01	010 404 000 740 394	DAPE Services T. Anderson 12.25h @ \$105	\$1,286.25
PO#:			E 01	010 203 000 000 305	GenEd Psych	\$220.00
			E 01	010 420 000 740 394	SpEd Social Work K Massies 58.25h @ \$110	\$6,116.25

Bank	Check No	Code	Rcd	Vendor	Pmt/Void Date	Pmt Type
SHBC	18422	1482		Designs for Learning INC		Check
			E 01	005 740 000 000 305	GenEd Social Work 81.75h @ \$105	\$8,583.75
	PO#:	Voucher #:	13810	Invoice	Invoice No: 20241031155	12/18/2024
			E 01	010 420 000 419 366	SpEd PD 10/11/24	\$150.00
			E 01	010 420 000 419 366	SpEd PD 10/11/24	(\$150.00)
PO#:			E 01	010 420 640 419 366	SpEd PD 10/11/24	\$150.00
	Voucher #:		13809	Invoice	Invoice No: 24-0439	12/18/2024
			E 01	010 411 000 740 394	ASD Services C Voigtlander 12/18/24 27.5h @ \$	\$2,887.50
PO#:	Voucher #:		13811	Credit	Invoice No: 25-0446	12/18/2024
						Paid Amt: (\$2,887.50)
						Check Amount: \$13,600.00
SHBC	18423	1662		Esterbrooks Certified Public Accountants, Ltd		Check
			E 01	005 110 000 000 305	Audit Services	\$3,940.00
	PO#:	Voucher #:	13808	Invoice	Invoice No: 139023	12/18/2024
						Paid Amt: \$3,940.00
						Check Amount: \$3,940.00
SHBC	18424	1695		Jds Handyman Service LLC		Check
			E 01	005 810 000 000 305	Sink Repair	\$190.00
	PO#:	Voucher #:	13819	Invoice	Invoice No: 1240	12/18/2024
						Paid Amt: \$190.00
						Check Amount: \$190.00
SHBC	18425	1540		MN Dept of Health		Check
			E 02	005 770 000 701 820	Food Manager Cert Renewal	\$700.00
	PO#:	Voucher #:	13813	Invoice	Invoice No: DT121824	12/18/2024
						Paid Amt: \$700.00
						Check Amount: \$700.00
SHBC	18426	1618		MN PEIP		Check
			B 01	215 015	Health Insurance -Jan 2024	\$6,598.20
	PO#:	Voucher #:	13812	Invoice	Invoice No: 1464355	12/18/2024
						Paid Amt: \$6,598.20
						Check Amount: \$6,598.20
SHBC	18427	1690		Perfection Plus, Inc		Check
			E 01	005 810 000 000 401	Facility Supplies	\$171.11
	PO#:	Voucher #:	13814	Invoice	Invoice No: 315720	12/18/2024
						Paid Amt: \$171.11
						Check Amount: \$171.11
SHBC	18428	1099		Russell Security Resource Inc		Check
			E 01	005 810 000 000 305	Facility Service-	\$230.00
	PO#:	Voucher #:	13815	Invoice	Invoice No: A50531	12/18/2024
						Paid Amt: \$230.00
						Check Amount: \$230.00

Bank	Check No	Code	Rcd	Vendor	Pmt/Void Date	Pmt Type	
SHBC	18429	1606		The Master Teacher		Check	
			E 01 010 400 640 372 366	Para educator Online Training			\$132.00
PO#:	Voucher #:	13816	Invoice	Invoice No: 1411341	12/18/2024	Paid Amt:	\$132.00
						Check Amount:	\$132.00
SHBC	18430	1275		WM Corporate Services, INC		Check	
			E 01 005 810 000 000 330	Garbage/Recycling-Nov 2024			\$539.58
PO#:	Voucher #:	13817	Invoice	Invoice No: 7332317-1767-5	12/18/2024	Paid Amt:	\$539.58
						Check Amount:	\$539.58
SHBC	18431	1694		Wright County Sheriff's Office		Check	
			E 01 010 203 000 000 305	DARE Officer			\$200.00
PO#:	Voucher #:	13818	Invoice	Invoice No: 799	12/18/2024	Paid Amt:	\$200.00
						Check Amount:	\$200.00
SHBC	18432	1087		Sora Pediatric Therapy		Check	
			E 01 010 401 000 740 394	Speech Specialist Turner 11/04/24-11/25/24 97.1			\$8,580.00
PO#:	Voucher #:	13795	Invoice	Invoice No: 112724101113	12/19/2024	Paid Amt:	\$8,580.00
			E 01 010 410 000 740 394	OT Specialist L Snell 11/01/24-11/20/24 93h @ :			\$8,184.00
PO#:	Voucher #:	13793	Invoice	Invoice No: 112724101111	12/19/2024	Paid Amt:	\$8,184.00
			E 01 010 420 000 419 366	Mileage Reimbursement- 11/27/24 92 miles			\$59.80
PO#:	Voucher #:	13794	Invoice	Invoice No: 112724385139	12/19/2024	Paid Amt:	\$59.80
						Check Amount:	\$16,823.80
SHBC	18433	1614		Amy Savage		Check	
			E 01 010 203 000 000 401	Reimbursement- Classroom Supplies			\$319.11
PO#:	Voucher #:	13711	Invoice	Invoice No: DT111124	12/19/2024	Paid Amt:	\$319.11
						Check Amount:	\$319.11
Report Total:							\$164,572.96

Adopted: 2005

Reviewed: 1.24.23

Student Attendance Policy

I. Purpose

- A. The Swan River Montessori Charter School (SRMCS) Board believes that regular school attendance is directly related to success in academic work, benefits students socially, provides opportunities for important communications between teachers and students, and establishes regular habits of dependability important to the future of the student. The purpose of this policy is to encourage regular school attendance. It is intended to be positive and not punitive.
- B. This policy also recognizes that class attendance is a joint responsibility to be shared by the student, parent or guardian, teacher, and administrators. This policy will assist students in attending class.

II. General Statement of Policy

A. Responsibilities

1. **Student's Responsibility.** It is the student's right to be in school. It is also the student's responsibility to attend all assigned classes every day that school is in session and to be aware of and follow the correct procedures when absent from an assigned class. Finally, it is the student's responsibility to request any missed assignments due to an absence.
2. **Parent or Guardian's Responsibilities.** It is the responsibility of the student's parent or guardian to ensure the student is attending school, to inform the school in the event of a student absence, and to work cooperatively with the school and the student to solve any attendance issues that may arise.
3. **Teacher's Responsibilities.** It is the teacher's responsibility to take daily attendance records in each assigned class. It is also the teacher's responsibility to be familiar with all procedures governing attendance and to apply these procedures uniformly. It is also the teacher's responsibility to provide any student who has been absent with any missed assignments upon request. Finally, it is the teacher's responsibility to work cooperatively with the student's parent or guardian and the student to solve any attendance issues that may arise.

4. School Director's Responsibilities. It is the School Director, or designee's, responsibility to require students to attend all assigned classes. It is also School Director's responsibility to be familiar with all procedures governing attendance and to apply these procedures uniformly to all students, to maintain accurate records on student attendance, and to prepare a list of previous day's absences stating the status of each. Finally, it is the School Director, or designee's, responsibility to inform the student's parent or guardian of the student's attendance and to work cooperatively with them and the student to solve attendance problems.

In accordance with the Minnesota Compulsory Instruction Law, Minn. Stat. § 120A.22, the students of SRMCS are REQUIRED to attend all assigned classes every day school is in session, unless the student has been excused by the SRMCS School Board from attendance because the student has already completed state and school district standards required to graduate from high school, has withdrawn, or has a valid excuse for absence.

B. Attendance Procedures

1. Excused Absences. To be considered an excused absence, the student's parent or legal guardian may be asked to verify, in writing, the reason for the student's absence from school. A note from a physician or a licensed mental health professional stating that the student cannot attend school is a valid excuse and must be provided after three consecutive days of absenteeism. Consequences of unexcused absenteeism are written below.

The following reasons shall be sufficient to constitute excused absences:

- Illness.
- Serious illness in the student's immediate family.
- A death or funeral in the student's immediate family or of a close friend or relative.
- Medical, dental, orthodontic, or counseling appointment.
- Court appearances occasioned by family or personal action.
- Religious instruction not to exceed three hours in any week.
- Physical emergency conditions such as fire, flood, storm, etc.
- Official school field trip or other school-sponsored outing.
- Vacation with family.
- Family emergencies.
- A student's condition that requires ongoing treatment for a mental health diagnosis.

2. Consequences of Excused Absences. Students whose absences are excused are required to make up all assignments missed or to complete alternative assignments as deemed appropriate by the classroom teacher.

Work missed because of absence must be made up by the due date assigned by the child's primary teacher. Any work not completed within this period shall result in "no credit" for the missed assignment. However, the classroom teacher may extend the time allowed for completion of make-up work in the case of an extended illness or other extenuating circumstances.

3. Unexcused Absences. The following are examples of absences which will not be excused:

- An absence by a student which was not approved by the parent and/or SRMCS.
- Any student absence in which the parent/guardian failed to comply with any reporting requirements of SRMCS' attendance procedures.
- Excessive vacation time during the school year. This will be addressed at the discretion of the School Director on a case by case basis.
- Absences resulting from cumulated unexcused tardies. Three (3) tardies equal one (1) unexcused absence.
- Removal of a student pursuant to a suspension. Suspensions are to be handled as excused absences and students will be permitted to complete make-up work.
- Any other absence not included under the attendance procedures set out in this policy.
- Babysitting, shopping, hair appointments, working at home, oversleeping, missing the bus, running late, and other incidences as determined by administration.

4. Consequences of Unexcused Absences. Absences resulting from official suspension will be handled in accordance with the Pupil Fair Dismissal Act, Minn. Stat. § 121A.40-121A.56.

Days during which a student is suspended from school shall not be counted in a student's total cumulated unexcused absences.

In cases of recurring unexcused absences, the administration may also request the county attorney to file a petition with the juvenile court, pursuant to Minnesota's statutes.

Students with unexcused absences shall be subject to discipline in the following manner:

- Work missed because of unexcused absence must be made up within the assigned timeframe as provided by the child's primary teacher.
- After the third cumulated unexcused absence, SRMCS will notify the parent/guardian by email or phone and may refer the student to the appropriate Human Services Agency.
- After such notification, the student or his/her parent or guardian may, within five (5) business days, request a conference with school officials regarding the student's absences and the prescribed discipline. The notification will state that the school strongly urges the student's parent/guardian to request such a conference.

C. **Tardiness**

1. **Definition.** Students are expected to be in their assigned classroom at designated times. Failures to do so constitute tardiness.

2. **Procedures for Reporting Tardiness.**

- A student is considered tardy if s/he arrives after the start of the school day until 10:15 a.m.
- A student is considered absent for half a day if s/he arrives at school any time after 10:15 a.m. OR if s/he leaves school before 1:15 p.m.
- A student is considered absent for a full day if s/he misses three or more hours of the school day.

3. **Excused Tardiness.** Valid excuses for tardiness are:

- Illness.
- Serious illness in the student's immediate family.
- A death or funeral in the student's immediate family or of a close friend or relative.
- Medical, dental, orthodontic, or counseling appointment.
- Court appearances occasioned by family or personal action.
- Physical emergency conditions such as fire, flood, storm, etc.
- Any tardiness for which the student has been excused in writing by an administrator or staff member.

4. **Unexcused Tardiness.** Unexcused tardiness is failing to be in an assigned classroom at the designated time the class commences without a valid excuse.

Three (3) unexcused tardies are equivalent to one unexcused absence. SRMCS will send a letter/email home to the parents/guardians indicating three unexcused tardies have turned into one unexcused absence.

III. **Dissemination of Policy**

Copies of this policy shall be made available to all students and parents at the commencement of each school year via the SRMCS at www.swanrivermontessori.org. This policy shall also be available upon request.

IV. **Required Reporting**

A. **Continuing Truant.** Minn. Stat. § 260A.02 provides that a continuing truant is a student who is subject to the compulsory instruction requirements of Minn. Stat. § 120A.05 and is absent from instruction in a school, as defined in Minn. Stat. § 120.05, without valid excuse within a single school year for three days if the child is in elementary school.

B. **Reporting Responsibility.** When a student is initially classified as a continuing truant, Minn. Stat. §260A.03 provides that the school official shall notify the student's parent or legal guardian, by first class mail or other reasonable means, of the following:

1. The child is truant;
2. That the parent or guardian should notify the school if there is a valid excuse for the child's absence;
3. That the parent or guardian is obligated to compel the attendance of the child at school pursuant to Minn. Stat. §120A.22 and parents or guardians who fail to meet this obligation may be subject to prosecution under Minn. Stat. §120A.34;
4. That this notification serves as the notification required by Minn. Stat. §120A.34;
5. That alternative educational programs and services may be available in the district;
6. That the parent/guardian has the right to meet with appropriate SRMCS personnel to discuss solutions to the child's truancy;
7. That if the child continues to be truant, the parent and child may be subject to juvenile court proceedings under Minn. Ch. 260;
8. That it is recommended that the parent/guardian accompany the child to school and attend classes with the child for one day.

- C. **Habitual Truant.** A habitual truant is a child under the age of 16 years who is absent from attendance at school without lawful excuse for seven (7) school days if the child is in elementary school. SRMCS shall refer a habitual truant child and the child's parents or legal guardian to appropriate services and procedures as stated under Minn. Ch. 260A.

NOTE: The School Director reserves the right to address student attendance at any time for any reason. Any attendance issues/concerns that arise and do not fit within the policy guidelines as stated above will be dealt with on a case by case basis, if deemed necessary by the Director.

Swan River Montessori Charter School

Adopted: August 2006

Reviewed: 1.24.23

DISABILITY NONDISCRIMINATION POLICY

I. PURPOSE

The purpose of this policy is to provide a fair employment setting for all persons and to comply with state and federal law.

II. GENERAL STATEMENT OF POLICY

- A. Swan River Montessori Charter School (SRMCS) shall not discriminate against qualified individuals with disabilities or because of the disabilities of such individuals in regard to job application procedures, hiring, advancement, discharge, compensation, job training, and other terms, conditions, and privileges of employment.
- B. SRMCS shall not engage in contractual or other arrangements that have the effect of subjecting its qualified applicants or employees with disabilities to discrimination on the basis of disability. The school district shall not exclude or otherwise deny equal jobs or job benefits to a qualified individual because of the known disability of an individual with whom the qualified individual is known to have a relationship or association.
- C. SRMCS shall make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, unless the accommodation would impose undue hardship on the operation of the business of the school district.
- D. Any job applicant or employee wishing to discuss the need for a reasonable accommodation, or other matters related to a disability or the enforcement and application of this policy, should contact Swan River Montessori Charter School's Director. This individual is the school district's appointed ADA/Section 504 Coordinator.

Adopted: August 29, 2005

Reviewed: 1.24.23

EQUAL EMPLOYMENT OPPORTUNITY

I. PURPOSE

The purpose of this policy is to provide equal employment opportunity for all applicants for school district employment and school district employees.

II. GENERAL STATEMENT OF POLICY

- A. It is the school district's policy to provide equal employment opportunity for all applicants and employees. The school district does not unlawfully discriminate on the basis of race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, disability, sexual orientation, age, family care leave status or veteran status. The school district also makes reasonable accommodations for employees with disabilities.
- B. The school district prohibits the harassment of any individual for any of the categories listed above. For information about the types of conduct that constitute impermissible harassment and the school district's internal procedures for addressing complaints of harassment, please refer to the school district's policy on harassment and violence.
- C. This policy applies to all areas of employment including hiring, discharge, promotion, compensation, facilities or privileges of employment.
- D. It is the responsibility of every school district employee to follow this policy.
- E. Any person having any questions regarding this policy should contact the School Director or other designee.

Adopted: August 29, 2005

Reviewed: 1.24.23

Harassment and Violence Prohibition Policy

(Bullying Prohibition Policy)

I. PURPOSE

- A. It will be a violation of this policy for any student or district employee to harass a student or district employee through conduct (e.g., physical, verbal, graphic or written) that is based upon that student or employee's actual or perceived race, color, creed, national origin, religion, sex/gender, sexual orientation, disability, public assistance, or marital status or age [protected class] as defined by this policy. For purposes of this policy, a district employee includes school board members, school employees, agents, volunteers, contractors, or persons subject to the supervision and control of the district. For purposes of this policy, school district includes charter schools.
- B. It will be a violation of this policy for any student or district employee to inflict, threaten to inflict, or attempt to inflict violence based upon a student or district employee's actual or perceived protected class as defined by this policy.
- C. The school district will investigate all complaints, formal or informal, verbal or written, of harassment and/or violence based upon a student or employee's perceived or actual protected class and to discipline or take appropriate action against any student or school district employee who is found to have violated this policy.

II. DEFINITIONS

The following definitions, which have been modified for purposes of this policy, are found in the Minnesota Human Rights Act. Please note that there is not a definition for every protected class.

- A. Disability. "'Disability' means any condition or characteristic that renders a person a disabled person. A disabled person is any person who (1) has a physical, sensory, or mental impairment which materially limits one or more major life activities; (2) has a record of such an impairment; or (3) is regarded as having such an impairment."¹
- B. Discriminate. "The term 'discriminate' includes segregate or separate and, for purposes of discrimination based on sex, it includes sexual harassment."
- C. Educational institution. "Educational institution" means a public or private institution and includes an academy, college, elementary or secondary school, extension course,

¹ This includes students with an IFSP, IEP, and students who qualify for special education and related aids and services under Section 504 of the Rehabilitation Act.

kindergarten, nursery, school system and a business, nursing, professional, secretarial, technical, vocational school, and includes an agent of an educational institution.”

- D. National origin. ““National origin” means the place of birth of an individual or of any of the individual’s lineal ancestors.”²
- E. Sexual harassment. “Sexual harassment” includes unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact or other verbal or physical conduct or communication of a sexual nature when:
 - (1) submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of obtaining employment, ... [or] education...;
 - (2) submission to or rejection of that conduct or communication by an individual is used as a factor in decisions affecting that individual’s employment, ...[or] education...; or
 - (3) that conduct or communication has the purpose or effect of substantially interfering with an individual’s employment, ...[or] education..., or creating an intimidating, hostile, or offensive employment, ...[or] educational... environment.”
- F. Sexual orientation. “Sexual orientation” means having or being perceived as having an emotional, physical, or sexual attachment to another person without regard to the sex of that person or having or being perceived as having an orientation for such attachment, or having or being perceived as having a self-image or identity not traditionally associated with one’s biological maleness or femaleness.

III. HARASSMENT AND VIOLENCE GENERAL APPLICABILITY

- A. The anti discrimination laws apply to all of the academic and nonacademic (e.g. athletic, and extracurricular) programs of the school district, whether conducted in school district facilities or elsewhere.
- B. For purposes of this policy, any student who is harassed or discriminated against, including subject to violence, by peers or school district employees based upon that student’s actual or perceived sex/gender, sexual orientation, race, color, creed, national origin, religion, disability, receipt of public assistance, or marital status and age [protected class] may file a complaint as described more fully in section IV below.
- C. For purposes of this policy, any school district employee who is harassed or discriminated against, including violence, by students or other school district employees based upon that employee’s actual or perceived sex/gender, sexual orientation, race, color, creed, national origin, religion, disability, receipt of public assistance, or marital status and age may file a complaint as described more fully in section IV below.
- D. The alleged harassment/violence consists of harassing conduct (e.g. physical, verbal, graphic, or written verbal or physical) based upon that student’s actual or perceived protected class that interferes or limits the ability of that student to participate in, enjoy, or benefit from the education program, including athletics and extracurricular activities.
- E. The alleged harassment/violence may not be directed at a particular person, but may instead consist of harassing conduct (e.g. physical, verbal, graphic, or written) that

² This includes harassment of students born in the United States who have relatives that are from other countries.

creates a hostile environment for students based upon actual or perceived protected class that interferes with or limits the student's ability to participate in, enjoy, or benefit from the academic and nonacademic programs, including athletics and extracurricular activities.

IV. DESCRIPTION OF HARASSMENT BASED UPON A PERSON'S PERCEIVED OR ACTUAL PROTECTED CLASS

A. Harassment is unwelcome conduct that is based upon actual or perceived sex/gender, sexual orientation, race, color, creed, national origin, religion, disability, receipt of public assistance, or marital status and age.

(1) Harassing conduct may take many forms, including verbal acts and name-calling, as well as nonverbal behavior, such as graphic and written statements, or conduct that is physically threatening, harmful, or humiliating.

(2) It is unwelcome if the student or employee did not request or invite it and considered the conduct to be undesirable or offensive.

(3) The conduct is considered harassment if it creates a hostile environment by interfering with or denying a student's participation in or receipt of benefits, services, or opportunities in the school district's programs.

B. Sexual harassment based upon sex/gender and/or sexual orientation

(1) Sexual conduct that is unwelcome.

a. It is unwelcome if the student or employee did not request or invite it and considered the conduct undesirable or offensive.

b. A student's submission or failure to complain does not mean that the conduct was welcome – look at circumstances.

C. Sexual violence: Sexual violence is a physical act of aggression or force or the threat thereof which involves the touching of another's intimate parts, or forcing a person to touch any person's intimate parts. Intimate parts, as defined in Minnesota Statutes, section 609.341, includes the primary genital area, groin, inner thigh, buttocks or breast, as well as the clothing covering these areas.

(1) Sexual violence includes rape, sexual assault, and dating violence. This includes coerced sexual intercourse or other sexual acts. The physical act is considered non consensual if a person is incapable of giving consent due to alcohol or drug use or due to an intellectual or other disability.

(2) Sexual violence includes touching, patting, grabbing, or pinching another student's or employee's intimate parts of the clothing covering the intimate parts.

(3) Sexual violence includes coercing or forcing or attempting to coerce or force a student or employee to touch anyone's intimate parts.

(4) A police report does not relieve the school of its responsibilities under Title IX.

D. Assault: Assault, as defined in state statute is:

- (1) an act done with intent to cause fear in another of immediate bodily harm or death; or
- (2) the intentional infliction of or attempt to inflict bodily harm upon another.

E. Racial, color, creed or national origin harassment/violence

- (1) Intimidation or abusive behavior toward a student, based on perceived or actual race, color, creed or national origin, that creates a hostile environment by interfering with or denying a student's participation in or receipt of benefits, services, or opportunities in the school district's programs.
- (2) Racial violence: Racial violence is a physical act of aggression or force, or the threat thereof, which is directed toward a student or employee based upon their perceived or actual race, color, creed, or national origin.

F. Religious harassment/violence

- (1) Intimidation or abusive behavior toward a student based on perceived or actual religious beliefs that create a hostile environment by interfering with or denying a student's participation in or receipt of benefits, services, or opportunities in the school district's programs.
- (2) Religious violence is the threat of or an actual physical act of aggression or force which is directed toward a student or employee based upon their perceived or actual religion.

G. Disability harassment

- (1) Intimidation or abusive behavior toward a student based on disability that creates a hostile environment by interfering with or denying a student's participation in or receipt of benefits, services, or opportunities in the school district's programs.
- (2) Disability harassment also may deny a student with a disability a free and appropriate public education (FAPE). Harassment of a student based on disability may decrease the student's ability to benefit from his or her education and amount to a denial of FAPE.

V. REPORTING PROCEDURES

- A. The adoption and implementation of a proper reporting system can help the school district comply with the Minnesota Human Rights Act by allowing the school district to promptly address allegations of harassment and violence.
- B. Pursuant to Title IX, each school district must designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under the regulations, including Title IX complaint investigation (Title IX Coordinator). 34 C.F.R., section 106.8(a). Each school district must also publish grievance procedures providing for prompt and equitable resolution of sex discrimination complaints, including complaints of sexual harassment. In addition, under Section 504 and Title II, school districts are also required to have grievance procedures to address disability harassment.

- C. Minnesota Statutes, section 121A.03 requires that school districts have reporting procedures for sexual, religious, and racial harassment and/or violence complaints.
- (1) For purposes of meeting the state reporting requirements, the following reporting procedure will be made available for students and staff who wish to report an incident or incidents that may involve harassment or violence based upon actual or perceived sex/gender, sexual orientation, race, color, creed, national origin, religion, disability, receipt of public assistance, or marital status and age.
 - (2) Designated school district person to receive oral or written complaints/reports of actual or perceived sex/gender, sexual orientation, race, color, creed, national origin, religion, disability, receipt of public assistance, or marital status and age.
- D. Human Rights Officer Designation
- (1) The school board hereby designates the School Director and/or the Operations Coordinator as the school district human rights officer(s) to receive reports or complaints of harassment or violence based upon actual or perceived sex/gender, sexual orientation, race, color, creed, national origin, religion, disability, receipt of public assistance, or marital status and age. If the complaint involves one of the designated human rights officers, the complaint will be filed directly with the superintendent.
 - (2) In the event the superintendent is the designated human rights officer, the complaint should be filed directly with the school board.
- E. The school district will conspicuously post the name of the human rights officer(s), superintendent, and school board: including mailing addresses and telephone numbers.
- (1) The Human Rights Officer is Annette Vemuri

Mailing address: 500 Maple Street Monticello MN 55362

Telephone number: 763-271-7926

Email address: director@swanrivermontessori.org
 - (2) The superintendent is Annette Vemuri

Mailing address: 500 Maple Street Monticello MN 55362

Telephone number: 763-271-7926

Email address: director@swanrivermontessori.org
 - (3) The school board contact information is: Franco Fanucci, Board President

Mailing address: 500 Maple Street Monticello MN 55362

Telephone number: 763-271-7926

Email address: francof@swanrivermontessori.org

- F. These reporting procedures are not intended to prevent a person from reporting harassment or violence incident(s) to another school official.
 - (1) The school official must immediately notify the principal, who is then responsible to submit the oral or written complaint/report to the human rights officer without screening or investigating the credibility of the report. If the school principal is not available on the date of the report, then the school official must forward the oral or written report/complaint directly to the human rights officer.
 - (2) If the report was given verbally, the principal will personally reduce it to written form within 24 hours and forward it to the human rights officer.
 - a. If the school principal fails to forward any harassment or violence report or complaint (written or verbal) to the human rights officer within 24 hours, the principal will be subject to disciplinary action.
 - (3) If the complaint involves the building principal, the complaint will be made or filed directly with the superintendent or the school district human rights officer by the school official or reporting party or complainant.
- G. The human rights officer may request, but not insist, upon a written complaint. The school district encourages the reporting party to complete the complaint form for written complaints. It is available from the principal of each building or the school district office. Alternative means of filing a complaint, such as through a personal interview or by tape recording, will be made available upon request for qualified persons with a disability.
- H. The complaint (verbal or written) should be reported to a school official immediately, or within 30 calendar days whenever possible, of the alleged violation. The school district will accept reports of alleged incidents that are older than 30 calendar days; however, delays between the date of the alleged incident and the reporting date may make investigations more difficult.

VI. INVESTIGATION

- A. The human rights officer, upon receipt of a complaint alleging discrimination or harassment toward an employee or student, will promptly undertake an investigation if deemed appropriate. The Title IX coordinator may conduct the investigation complaints of sexual harassment, the 504 coordinator for complaints of disability harassment, or the human rights officer for other types of alleged harassment and violence covered by this policy. The Title IX coordinator/504 coordinator or human rights officer may designate a neutral third party to conduct the investigation. The investigation will be completed within 30 calendar days from receipt of the complaint, unless impracticable.
- B. The investigation may consist of personal interviews with the complainant, the individual(s) against whom the complaint is filed, and others who may have knowledge of the alleged incident(s) or circumstances giving rise to the complaint. The investigation may also consist of any other methods and documents deemed pertinent by the investigator.
- C. In determining whether alleged conduct constitutes a violation of this policy, the school district will consider the facts and the surrounding circumstances, such as the nature of the behavior, past incidents or continuing patterns of behavior, the relationships between the parties involved, and the context in which the alleged incident occurred.

- D. The school district may take immediate steps to protect the parties involved in the complaint process, pending completion of an investigation of alleged unlawful discrimination or harassment of an employee or student.
- (1) Upon completion of the investigation, the school district or neutral third party designated investigator will make a written report to the human rights officer. If the complaint involves the human rights officer, the report must be filed directly with the superintendent. If the complaint involves the superintendent, the report must be filed directly with the school board. The report will include the facts, a determination of whether the allegations have been substantiated and whether a violation of this policy has occurred, as well as a description of any proposed resolution which may include alternate dispute resolution.
 - (2) Upon completion of the investigation, the human rights officer will inform the complainant/reporter of his or her right to review the written report at the school building where the complainant/reporter is employed or enrolled, in accordance with state and federal law regarding data or records privacy.
 - (3) If the complainant/reporter is a student, the human rights officer will inform the parent/guardian of his or her right to review the written report at the school building where the student reporter is enrolled, in accordance with state and federal law regarding data or records privacy.
 - (4) The school district must comply with federal and state law pertaining to retention of records.

VII. APPEAL

If the grievance has not been resolved to the satisfaction of the complainant/reporter, s/he may appeal to the human rights officer within ten (10) school days of receipt of the findings of the school district investigation. The school district investigator will conduct a review of the appeal and, within ten (10) school days of receipt of the appeal, will affirm, reverse, or modify the findings of the report. The decision of the school district investigator is final, and action will occur as addressed in VIII below.

VIII. SCHOOL DISTRICT ACTION

- A. Upon conclusion of the investigation and receipt of the findings, the school district will take appropriate and effective action. If the investigator determined that a violation of this policy has occurred, such action may include, but is not limited to, warning, suspension, exclusion, expulsion, transfer, remediation, termination or discharge. Actions may also include alternative dispute resolution, including restorative justice programs, school or district wide training, counseling, and class transfer. School district action taken for violation of this policy will be consistent with the requirements of applicable collective bargaining agreements, state and federal law, and school district policies.
- B. The result of the school district's investigation of each complaint filed under these procedures will be reported in writing to the complainant by the school district in accordance with state and federal law regarding data or records privacy.

IX. REPRISAL

- A. The school district will take appropriate action against any student, teacher, administrator or other school personnel who retaliates against any person who reports alleged unlawful harassment toward an employee or student or any person who testifies, assists, participates in an investigation or hearing related to alleged unlawful harassment covered by this policy. Reprisal also includes retaliation against a student or district employee who associates with a person or group or persons who are disabled or who are of different race, color, creed, religion, sexual orientation, or national origin. Retaliation includes, but is not limited to, any form of intimidation or harassment. Reprisal is also prohibited based upon a request for a religious or disability accommodation.

X. CONFLICT OF INTEREST

- A. If there is a conflict of interest with respect to any party affected by this policy, appropriate accommodations will be made, such as, but not limited to, appointing or contracting with a neutral third party investigator to conduct the investigation, or recusal from the process by the person for whom a conflict or potential conflict of interest exists.

XI. HARASSMENT OR VIOLENCE AS ABUSE

- A. Under certain circumstances, alleged harassment or violence may also be possible abuse under Minnesota law. If so, the duties of mandatory reporting under Minnesota Statutes, section 626.556 may be applicable.
- B. Nothing in this policy will prohibit the school district from taking immediate action to protect victims of alleged harassment, violence, or abuse.

XII. DISSEMINATION OF POLICY AND TRAINING

- A. This policy must be conspicuously posted throughout each school building in areas accessible to students and staff members.
- B. This policy must be given to each school district employee and independent contractor at the time of entering into the person's employment contract.
- C. This policy must be included in each school's student handbook on school policies.
- D. The school district has developed the following process for discussing the school's harassment and violence policy with students and school district employees: [Insert process to be followed at each school building].
- E. The school board will review this policy annually for compliance with state and federal law.
- F. The school district will post this policy on its website and ensure that it is easily accessible to view and download. If the school district does not have a website, the school district has made the policy accessible for parents and community members by [insert how it is made accessible].

XIII. RIGHT TO ALTERNATIVE COMPLAINT PROCEDURES

- A. These procedures do not deny the right of any individual to pursue other avenues of recourse which may include filing charges with the agencies below, filing a report with a law enforcement agency, or initiating action in state or federal court. For claims of unlawful discrimination/harassment:

Minnesota Department of Human Rights
Freeman Building
625 Robert Street North
St. Paul, MN 55155
toll free: 800.657.3704
tty: 651.296.1283
fax: 651.296.9042
<http://www.humanrights.state.mn.us>

U.S. Department of Education
Office for Civil rights, Region V
500 W. Madison Street- Suite 1475
Chicago IL 60661
Tel: 312.730.1560
TDD: 312.730.1609

Employment Discrimination/Harassment

Equal Employment Opportunity Commission (EEOC)

330 South 2nd Ave., Room 430

Minneapolis, MN 55401

(612) 335-4040

1-800-669-4000

Fax: (612) 335-4044

TTY: (612) 335-4045

www.eeoc.gov/minneapolis/index.html

Legal References and Resources

MDE's Model Policy Web page (www.education.state.mn.us > Welcome to MDE > Policies > Model School and District Policies) provides links to the Minnesota Department of Human Rights Web page for examples of harassment/discrimination, and to the federal Dear Colleague letters for specific examples of harassment and violence based upon a person's actual or perceived race, color, creed, national origin, religion, sex/gender, sexual orientation, disability, public assistance, or marital status or age.

Minn. Stat. § 121A.03, Subd. 2 (Sexual, Religious and Racial Harassment and Violence Policy)

Minn. Stat. Ch. 363A (Minnesota Human Rights Act)

Minn. Stat. § 609.224 (Assault in the Fifth Degree)

Minn. Stat. § 626.556 *et seq.* (Reporting of Maltreatment of Minors)

42 U.S.C. § 2000e *et seq.* (Title VI of the Civil Rights Act) (Title VI)

20 U.S.C. § 1681, *et. seq.* Title IX of the Education Amendments of 1972 (Title IX)

29 U.S.C. §794 Section 504 of the Rehabilitation Act of 1973 (Section 504)

42 U.S.C. § 12131 *et. seq.* Title II of the American with Disabilities Act of 1990 (Title II)

Resources for Definitions and Examples of Discrimination or Harassment

Federal Resources

Department of Justice: Dear Colleague Letter: Enrollment practices addressing actual or perceived citizenship (2011) (US Department of Justice)

Office of Civil Rights (OCR)

Dear Colleague Letter dated April 4, 2011: Sexual Harassment and Sexual Violence (2011)

Dear Colleague Letter: Bullying and Harassment (2010)

Dear Colleague Letter: Sexual Harassment Issues (2006)

Dear Colleague Letter: Religious Discrimination (2004)

Dear Colleague Letter: First Amendment (2003)

Dear Colleague Letter: Prohibited Disability Harassment (2000)

The OCR Dear Colleague Letters can be viewed on the U.S. Department of Education website: <http://www2.ed.gov/about/offices/list/ocr/publications.html>.

Harassment and Violence Prohibition Policy

Sexual Harassment: It's Not academic (Revised 2008)

Sexual Harassment Guidance (revised 2001)

Racial Incidents and harassment against Students (1994)

State Resource:

MDH website for more information about the Minnesota Human Rights Act:

<http://www.humanrights.state.mn.us/>.

Technical Assistance and Training

U.S. Department of Education, Office of School Support and Technology Programs, Equity Assistance Centers Program (<http://www2.ed.gov/programs/equitycenters/index.html>). As set forth on the website, Centers work with schools in the areas of harassment, bullying, and prejudice reduction. Centers also develop materials, strategies, and professional development activities to assist schools and communities in preventing and countering harassment based on ethnicity or gender. More recently, they provide resources and training in the areas of hate crimes, racial prejudice, and bullying.

Minnesota is in Region V, Programs for Educational Opportunity, University of Michigan, Programs for Educational Opportunity (PEO)

1005 School of Education

Ann Arbor, MI, 48109

Dr. Percy Bates, Director (2008-2011)

Tel: 734.763.9910

Fax: 734.763.2137

Center on Positive Behavioral Interventions and Supports, established by the Office of Special Education Programs, U.S. Department of Education, <http://pbis.org>

Swan River Montessori Charter School

Adopted: August 29, 2005

Reviewed: 1.24.23

Student Disability Non-Discrimination Policy: Section 504

PURPOSE

The purpose of this policy is to protect disabled students from discrimination on the basis of disability and to identify and evaluate learners who, within the intent of Section 504 of the Rehabilitation Act of 1973, need special services, accommodations, or programs in order that such learners may receive a free, appropriate public education.

GENERAL STATEMENT OF POLICY

- A. Students with disabilities are protected from discrimination on the basis of a disability.
- B. It is the responsibility of the school district to identify and evaluate learners who, within the intent of Section 504 of the Rehabilitation Act of 1973, need special services, accommodations, or programs in order that such learners may receive a free, appropriate public education.
- C. For this policy, a learner who is protected under Section 504 is one who:
 - a. Has a physical or mental impairment that substantially limits one or more major life activities, including learning
 - b. Has a record of such impairment
 - c. Is regarded as have such impairment.
- D. Learners may be protected from disability discrimination and be eligible for services, accommodations, or programs under the provisions of Section 504 even though they are not eligible for special education pursuant to the Individuals with Disabilities Education Act.

COORDINATOR

Persons who have questions, comments, or complaints should contact the School Director or designee regarding grievances or hearing requests regarding disability issues. This person is the school district's ADA/504 Coordinator.

Adopted: 1.21.25

Revised:

Nondiscrimination Policy

Swan River Montessori Charter School does not and shall not discriminate on the basis of race, hair features based on race, color, religion, creed, gender, gender expression, age, national origin, ancestry, disability, pregnancy status, marital status, sexual orientation, status with regarding to public assistance, or military status, in any of its activities or operations. These activities include, but are not limited to, hiring and firing of any staff, selection of volunteers and vendors, and provision of services.

Swan River Montessori Charter School is committed to providing an inclusive and welcoming facility and environment for all. This statement is in accordance with the provisions of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Regulations of the U.S. Department of Health, the Minnesota Human Rights Act Minn. Stat. Ch. 363A, and Human Services issued pursuant to these statutes at Title 45 Code of Federal Regulations Parts 80, 84, and 91.

Swan River Montessori Charter School

Adopted: 1.21.25

Revised:

Journalism Policy

I. PURPOSE

The purpose of this Policy is to address students' rights to freedom of speech and freedom of the press in the production and distribution of school-sponsored media while balancing the SRMCS' role in supervising school-sponsored media and the operation of the School. This Policy is designed to ensure all students enjoy the freedoms of speech and press within the confines of the law, including Minnesota Statutes Section 121A.80, and to encourage responsible student journalism.

II. DEFINITIONS

- A. "Defamatory" means a false and unprivileged statement to a third person about an individual that tends to harm the individual's reputation or lower that individual in the esteem of the community.
- B. "Distribute" means to hand-out, offer, circulate, post, display, or otherwise disseminate media to multiple students, regardless of whether the media is free or provided for a charge.
- C. "Material and substantial disruption" means a significant disruption to the learning process, to the rights of others to an education, to school operations, to the ability of any school employee to perform his or her duties, or to the operation of any school-sponsored event or activity. It also includes conduct that creates an immediate danger to self or others or incites unlawful conduct. School officials may reasonably forecast a material and substantial disruption based on factors such as past experience in the school, current events influencing student activities and behaviors, and threatened disruption related to the school-sponsored media in question.
- D. "Prior restraint" means a prohibition under threat of adverse action by the School or a School employee on a student journalist producing, publishing, or distributing school-sponsored media before it has been produced, published, or distributed to its intended audience.
- E. "School-sponsored media" means any material that is:
 - 1. prepared, wholly or substantially written, published, broadcast, or otherwise disseminated, in any media form, by a student journalist;

2. distributed or generally made available to students in the school; and
3. prepared by a student journalist under the supervision of a student media advisor.

School-sponsored media does not include material prepared solely for distribution or transmission in the classroom in which the material is produced, or a yearbook.

- F. “Student journalist” means a charter school student in 6th grade who gathers, compiles, writes, edits, photographs, records, or otherwise prepares information for dissemination in school-sponsored media.
- G. “Student media advisor” means a qualified teacher, as defined in Minnesota Statutes Section 122A.16, that the School employs, appoints, or designates to supervise student journalists or provide instruction related to school-sponsored media.
- H. “Obscene” means a work that, taken as a whole, appeals to the prurient interest in sex and depicts or describes in a patently offensive manner sexual conduct and that, taken as a whole, does not have serious literary, artistic, political, or scientific value.

III. GUIDELINES

- A. **Protected Student Expression.** Except as provided in Section III.B, a student journalist has the right to exercise the freedoms of speech and press in school-sponsored media regardless of whether the school-sponsored media receives financial support from the School, uses School equipment or facilities in its production, or is produced as part of a class or course in which the student journalist is enrolled. These freedoms include the freedom to express political viewpoints. Subject to Section III.B, student journalists have the right to determine the news, opinion, feature, and advertising content of school-sponsored media. The School must not discipline a student journalist for exercising rights or freedoms consistent with this Policy or under the First Amendment of the United States Constitution.
- B. **Unprotected and Prohibited Student Expression.** This Policy does not authorize or protect and expressly prohibits student expression in school-sponsored media that:
 1. is obscene to minors;
 2. is defamatory;
 3. is profane, harassing, threatening, or intimidating;
 4. constitutes an unwarranted invasion of privacy;
 5. violates federal or state law or School policies or rules, including but not

limited to policies on harassment, discrimination, violence, and bullying;

6. is directed at inciting or producing imminent lawless action on School premises or violation of School policies or rules, including but not limited to policies on harassment, discrimination, violence, and bullying;
7. causes a material and substantial disruption to school activities;
8. advertises or promotes any product or service that is unlawful for purchase or use by minors; or
9. is distributed or displayed in violation of the time, place, and manner regulations in Section III.D.

- C. **Student Media Advisors.** Student media advisors shall oversee student journalism in accordance with the terms of this Policy. The School must not retaliate or take adverse employment action against a student media adviser for supporting a student journalist exercising rights or freedoms under Section III.A or the First Amendment of the United States Constitution.

Nothing in this Policy inhibits a student media advisor from teaching professional standards of English and journalism to student journalists. These professional standards may include, but are not limited to, the following:

1. ensuring students or participants learn the lessons the activity is designed to teach and/or conform to the learning objectives of the activity;
2. ensuring that the intended audience of school-sponsored media is not exposed to material that may be inappropriate for its level of maturity;
3. ensuring that the views of the student journalist or individuals represented in the school-sponsored media are not erroneously attributed to the School or another individual or entity; or
4. ensuring that school-sponsored media is grammatical, proofread, edited, well-researched, factually accurate, and objective.

- D. **Time, Place, and Manner of Distribution.** Students shall be permitted to distribute school-sponsored media at school as follows:

1. Time. Distribution shall be limited to the hours before the school day begins, during the lunch hour, and after school is dismissed.
2. Place. School-sponsored media may be distributed in locations so as not to interfere with or impede the normal flow of traffic in School hallways, walkways, entryways, or parking lots and, if electronically distributed, so as to not interfere with the School's technology systems.

3. Manner. No one shall induce or coerce a student or staff member to accept school-sponsored media.
- E. **No Representation of School.** No expression made by student journalists, whether protected or unprotected, or in school-sponsored media shall be deemed to be an expression or representation of or by the School.

IV. PRIOR RESTRAINT

The School does not authorize prior restraint on school-sponsored media except as consistent with this Policy.

Student journalists who believe their rights under this Policy have been improperly restrained may, in a timely fashion, seek review of the prior restraint by the Director. To complete this review, the Director or designee may review the material subject to the student journalist's report and any other information deemed relevant, including consulting with the student media advisor and anyone else with relevant information on the reported prior restraint. The Director must issue a determination as to whether the reported prior restraint is consistent with this Policy as soon as reasonably possible in an effort to avoid an improper prior restraint. The Directors's determination shall be final, except that the Board of Directors may, in the Board of Director's sole discretion, review and revise the determination.

Legal References: U.S. Const. Amend. I
Minn. Const. Art. 1, § 3
Minn. Stat. § 121A.80
Tinker v. Des Moines Indep. Community Sch. Dist., 393 U.S. 503 (1969).
Hazelwood Sch. Dist. v. Kuhlmeier, 484 U.S. 260 (1988).
Bethel Sch. Dist. v. Fraser, 478 U.S. 675 (1986).
Morse v. Frederick, 551 U.S. 393 (2007).

Swan River Montessori Charter School

Adopted: 1.21.25

Revised:

SRMCS Personal Electronic Device Policy

Purpose

To create a focused, respectful, and engaging learning environment by regulating personal electronic device usage.

General Guidelines

- **Cellphones and Devices:** Must be turned off and kept out of sight during instructional time, including breaks and lunch.
- **Exceptions:**
 - Use for educational purposes with teacher permission.
 - Medical needs or emergencies with prior approval.

Parent Communication

For urgent matters, parents should contact the school office, rather than calling or texting students directly.

Enforcement

Students who do not comply with this policy will have their devices confiscated and must retrieve them from the office. Repeated violations will result in further disciplinary action.

Liability

The school is not responsible for any lost, stolen, or damaged personal electronic devices.



Reducing Lead in Drinking Water:

**A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND
CHILD CARE FACILITIES**



DEPARTMENT OF EDUCATION

DEPARTMENT OF HUMAN SERVICES

DEPARTMENT OF HEALTH

Reducing Lead in Drinking Water: A Technical Guidance for Minnesota's School and Child Care Facilities

Original: 1989

In 1989, MDH developed its first guidance document addressing lead in school drinking water based on the information in the 1988 EPA Lead Contamination Control Act.

Revisions: April 2018, March 2019, May 2021, April 2024

All previous versions are superseded by this 2024 guidance. Technical guidance revised to incorporate changes made to the Environmental Protection Agency guidance, ***3T's: Training, Testing and Telling*** now known as ***3T's: Training, Testing and Taking Action*** and additional modifications to conform with requirements of Minnesota Statutes as adopted in 2023.

A listing of applicable references is located at the end of this technical guidance in the order they appear in the document.

Minnesota Department of Education
Division of School Finance | Long-Term Facilities Maintenance
1500 Highway 36 West
Roseville, Minnesota 55113
651-582-8779
mde.funding@state.mn.us
[Minnesota Department of Education](https://www.mn.gov/Departments/Minnesota-Department-of-Education)

Minnesota Department of Human Services
Child Care Services
PO Box 64962
St. Paul, MN 55164-0962
Phone: 651-431-3809
dhs.ccap@state.mn.us

Minnesota Department of Health
Environmental Health Division | Drinking Water Protection
PO Box 64975
St. Paul, MN 55164-0975
651-201-4700
HEALTH.WIIN_Grant@state.mn.us
www.health.state.mn.us

To obtain this information in a different format, call: 651-201-4700.

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR
MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

CONTENTS

Introduction	1
What is the Purpose of this Technical Guidance?	1
Who is Required to Use this Technical Guidance?	1
Health Information	3
Why Worry About Lead?.....	3
Health Risks of Lead	3
Common Sources of Lead	4
How Does Lead Get into Drinking Water?	4
Why is Lead a Special Concern for ECES?	5
What Can Be Done to Reduce Lead Levels in Drinking Water?	5
Regulations and Guidance	7
MN State Statute 121A.335 - Lead in School Drinking Water	8
MN State Statute 145.9273 - Testing for Lead in Drinking Water in Child Care Settings.....	9
Head Start Policy & Regulations Memo ACF-IM-HS-23-01	10
The Safe Drinking Water Act, Lead and Copper Rule	10
The Lead Contamination Control Act.....	11
Reduction of Lead in Drinking Water Act	11
3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities	11
Guidance Values of Lead.....	12
State Agency Support for Lead Reduction Activities	13
MDE.....	13
DHS.....	13
MDH	14
Model Plan for Lead Testing	15
Required Components of a Model Plan.....	15
Step 1 - Sampling Program Development.....	16
Option 1: Analysis by an Accredited Laboratory	17
Option 2: Analysis Using Field Analyzers	18
Step 2 - Conduct First Draw Tap Sampling.....	19
Preparation and Planning	19
Sample Collection	20

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR
MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

Special Sampling Considerations	20
Step 3 - Interpret Results	21
Guidance on Interpreting Results and Recommended Remediation Options	22
Step 4 – Take Corrective Actions (Remediate)	23
Option 1: Removal and/or Replacement of Lead Sources	23
Option 2: Implement a Flushing Program.....	24
Individual Tap Flushing Program.....	24
Main Pipe Flushing Program	25
More on Flushing	25
Option 3: Cleaning Aerators	26
Option 4: Treatment	27
Building Relationships with your Public Water System	28
Step 5 – Retest	28
Interpreting Results after Implementing Remediation Actions	29
Step 6 - Communicate Results	29
Schools	29
Child Care Centers.....	30
Other Facilities	31
Step 7 - Report Results.....	31
Schools	31
Child Care Centers.....	32
Head Starts.....	32
Others	32
Step 8 – Water Management Plan.....	32
Glossary of Terms and Acronyms	34
References	37

Introduction

What is the Purpose of this Technical Guidance?

This technical guidance is designed to assist Minnesota's public school districts, charter schools, Head Start programs and child cares referred to as early care and education settings (ECES) in minimizing the exposure of students and staff to lead in drinking water. It also contains the model plan for lead testing of school and child care drinking water as required under [MN State Statute 121A.335](#) and [MN Statute 145.9273](#).

Minnesota Statutes, section 121A.335 requires schools to either adopt the technical guidance outlined in this document or develop and adopt an alternative plan that accurately and efficiently tests for the presence of lead in water in public school buildings serving students such as the 3Ts (Training, Testing, and Taking Action) guidance created by the United States Environmental Protection Agency. The statute further directs that this technical guidance be based on "standards established by the United States Environmental Protection Agency (EPA)" and current Minnesota Department of Health (MDH) guidance. In addition to describing required aspects (planning, testing, remediating, reporting), this document also presents flexible guidance that ECES can use in meeting their individual needs most efficiently.

The Minnesota Department of Education (MDE), Minnesota Department of Human Services (DHS), and MDH intend that facility staff consult this technical guidance when testing for lead in drinking water and implement activities when needed to reduce exposure to lead. Facilities are responsible for adopting and retaining the model plan or alternative plan and test results records, as well as making those results available to MDH, parents and the public per applicable statutes.



Who is Required to Use this Technical Guidance?

Public and charter schools: This technical guidance is intended for use by all public school districts and charter schools subject to requirements of Minnesota Statutes, section 121A.335. School administrators, school boards and others in positions of governance should review this technical guidance before conducting testing.

Child care facilities: In Minnesota, licensed or certified child care providers must test for lead in drinking water. For the purposes of Minnesota state testing requirements "licensed or certified child care provider" means a child care center licensed under Minnesota Rules, chapter 9503,

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

or a certified license-exempt child care center under chapter 245H. Additionally, MDH recommends that all child care providers test for lead, including family child care providers.

Head Start programs: Head Start programs that are also child care centers must follow the Minnesota child care statutes for testing and are also subject to the federal Office of Head Start (OHS) policies regarding testing for lead in drinking water. Using this technical guidance will help Head Start programs meet the OHS requirements for lead in water testing.

Other facilities serving children: MDH recommends that other facilities such as family child care providers, private schools, community centers, or other locations serving infants, preschoolers, and children test for lead to identify and reduce lead in drinking water. If a building or business is occupied by children for a large portion of the day or children would receive a significant proportion of their drinking water from the facility, then testing for lead regularly is encouraged.

Special considerations

If your ECES has its own well and it has been classified as a Nontransient Noncommunity Public Water System (NTNC PWS), additional lead testing must be completed for federal Safe Drinking Water Act (SDWA) compliance. Please contact MDH at 651-201-4700 if you have questions about SDWA lead testing.

If your ECES is served by a Community Public Water System (CPWS), i.e. municipality, you should contact your CPWS to learn more about lead in your water supply before testing your facility. Learning if a lead service line is present or reviewing the annual Consumer Confidence Report which describes the water quality can be helpful in planning your program. It's important to develop a working relationship with your CPWS, including having a coordinated communications plan if lead is detected.

Health Information

Why Worry About Lead?

Lead is a toxic material known to be harmful to human health if ingested or inhaled. Research has shown that exposure to lead is associated with adverse mental, physical, and behavioral effects on children. The current scientific consensus is that there is no safe level of lead exposure. More background can be found at [Centers for Disease Control and Prevention - Childhood Lead Poisoning Prevention](#). Therefore, any blood lead level can have negative health effects. While water is just one potential source of exposure to lead in the environment, reducing lead in ECES drinking water can decrease an individual's overall exposure.

Health Risks of Lead

While we have known that lead is toxic for many centuries, there has historically been a level of exposure presumed to be "safe." Over the years, the safe level has been reduced based on new research, but it was always there. However, in 2012, the Centers for Disease Control and Prevention dramatically changed the way lead toxicity is assessed. Instead of setting a safe level, the new approach acknowledges the fact that there is no currently known safe level of lead exposure and recommends a primary prevention approach (i.e., preventing a problem before it occurs) to reducing risk.



Children

Children are more susceptible to lead exposure because their bodies absorb metals at higher rates than the average adult. Children younger than six years old are most at risk due to their rapid rate of growth and ongoing brain development. Exposure to lead can cause damage to the brain, nervous system, red blood cells, and kidneys. Lead also has the potential to cause lower IQs, hearing impairments, reduced attention span, hyperactivity, developmental delays, and poor classroom performance.

The damage from lead exposure in children is permanent. Fortunately, the impacts of lead exposure can be minimized with good nutrition, a stimulating education, and a supportive environment.

Adults

High blood lead levels in adults have been linked to increased blood pressure, poor muscle coordination, nerve damage, decreased fertility, and hearing and vision impairment. Pregnant women and their fetuses are especially vulnerable to lead exposure since lead can significantly harm the fetus, causing lower birth weight and slowing normal mental and physical developments.

The [MDH Lead Program](#) has more information on the health impacts of lead on children and adults.



Common Sources of Lead

There are a number of pathways of exposure to lead in the environment. While this guidance focuses on lead in drinking water at ECES, it is important to reduce exposure from all potential sources of lead. These include:

- Lead-based paint in older homes (i.e., built before 1978). This is the most common source for childhood lead poisoning;
- Lead-contaminated dust and soil;
- Imported spices, cosmetics, and medications contaminated with lead;
- Pottery or ceramics with lead glazes;
- Exposure through lead dust from a household member who has a job or hobby that involves lead, such as construction or shooting firearms;
- Swallowing items that contain lead, such as fishing sinkers; and
- Corrosion of plumbing materials including brass, solder, and pipes.

While water is not typically the most prominent source of lead exposure for an individual, reducing lead in drinking water can help in lowering an individual's overall exposure.

How Does Lead Get into Drinking Water?

Lead found in drinking water comes primarily from materials and components associated with the water distribution system and plumbing. While public water distribution systems may have lead components, the highest concentrations of lead are typically found nearest to the tap.

Lead may be present in various materials in a building's plumbing system such as lead solder, brass fixtures, valves, and lead pipes. Corrosion of these materials allows lead to dissolve into the water passing through the plumbing system. The amount of corrosion depends on the type of plumbing materials, water quality characteristics, electrical currents, and how water is used. The longer water remains in contact with lead materials, the greater the chance lead can get into the water.



Why is Lead a Special Concern for ECES?

Children are more vulnerable to lead

Children typically have higher intake rates for environmental materials (such as soil, dust, food, water, air, paint) than adults. They are more likely to play in the dirt and put their hands and other objects in their mouths. Children tend to absorb a higher fraction of ingested lead than adults, which can slow the normal physical and mental development of their growing bodies. In addition, the physical and behavioral health effects from lead can impact student success and classroom performance. While the most vulnerable age for lead exposure is for children less than six years old, the brains of school-age children are still developing and can be significantly impacted by lead exposure.

Plumbing materials and water use patterns at ECES

Lead levels in the water within the plumbing system of ECES can vary greatly from tap to tap. Plumbing materials influence the amount of lead in drinking water due to the variety of materials in the system (e.g., lead or copper pipes, lead solder, and brass fixtures). The amount of time and usage patterns the water is in contact with various materials in the plumbing system may have a significant effect on the concentrations found as well. The “on-again, off-again” water use patterns of most ECES can contribute to elevated lead levels in drinking water. Water that remains stagnant in plumbing overnight, over a weekend, or during a vacation has longer contact with plumbing materials and therefore may contain higher levels of lead.



What Can Be Done to Reduce Lead Levels in Drinking Water?

This section is relevant to any tap used for drinking water or food preparation. These are best practices in reducing lead concentrations and can be used at home, school, or at work.

When evaluating the best approach for protecting against lead exposure in schools and child cares, it is important to balance a number of factors:

- Current research has not identified a safe level of exposure to lead;

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

- Lead is still present in many areas of the environment, making it very difficult to eliminate all exposure;
- The risks of developing irreparable damage from lead in water increase with higher concentrations of lead and longer exposure times;
- ECES buildings across the state are very different, being old/new, big/small, busy/limited, targeted/multi-purpose, which impacts the likelihood of lead exposure; and
- Local facilities have the best understanding of their buildings and how they are used; they can work with parents, students, teachers, and administrators to come up with the best approach for their specific situation.

An effective response to lead in water must consider all of the factors listed above.

Use only cold water for drinking and food preparation

Use only cold water for drinking, preparing food, and making baby formula. Hot water releases more lead from pipes than cold water. The water may be warmed before use in formula.

Let it run before use

Running water at a tap, prior to using it for drinking or food preparation, will typically help reduce lead levels in the water. This works by removing the water that has been in the longest contact with the plumbing materials, thus removing the water with the highest concentration of lead. The amount of time and frequency to let it run will be unique to each building. The only way to know if lead has been reduced after letting it run is to check with a test.

Routine maintenance

Building water systems require routine maintenance to function properly. Steps to help reduce the presence of lead in your water include:

- Clean faucet aerators on a quarterly basis - more often if debris buildup is observed - as lead-containing materials may accumulate in aerator screens.
- Use only certified lead-free materials when performing plumbing work. More information can be found in [How to Identify Lead Free Certification Marks for Drinking Water System & Plumbing Products](#).
- Follow the manufacturer's recommendations for water softener settings to ensure an appropriate level of hardness. The hardness of the incoming water may have to be determined by asking your water supplier or having a sample analyzed.
- If there are fixtures that have disrupted water flow or low pressure, make sure to repair, remove, or replace as necessary. Fixtures that are no longer operational can cause areas of stagnant water allowing lead levels to rise and be pulled into neighboring fixtures.
- Hot water fixtures should be hot and cold water fixtures should be cold. If water never gets cold, evaluating and fixing broken mixing valves may be necessary.

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

- Maintain any other water devices such as boilers, recirculating systems, or hot water heaters. Proper maintenance of all your water systems can prevent corrosion and other water quality concerns.
- Label all fixtures with intended use such as cleaning only, not for drinking, etc. Post any necessary procedures in plain language and consider using pictures for small children.

Test the water for lead

The only way to determine how much lead may be present in drinking water is to have the water tested. Each tap or fixture providing water for drinking or food preparation must be tested at least every five years. Some form of lead hazard reduction should be implemented for taps where lead is found at or above 5 parts per billion (ppb). Detailed instructions on testing water for lead and recommended lead hazard reduction options are found later in this document.

Water management planning

A water management strategy for maintaining water daily and after extended breaks and closures can help ensure consistent water quality and minimize risks of lead getting into drinking water. A water management plan not only prevents risk of lead but maintains water quality and may help reduce risk of other contaminants such as legionella. MDH can provide general consultation, but the local facilities are in the best position to understand and implement an effective strategy for their specific situation. EPA has guidance, [Ensuring Drinking Water Quality in Schools During and After Extended Closures \(PDF\)](#) for ECESs to reduce lead exposure.



Regulations and Guidance

Due to lead's health effects and the special circumstances that make lead a concern in ECES, a number of legal requirements and guidance materials exist that are applicable to reducing lead in ECES drinking water.

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

Table 1 displays the statutes and regulations (enforceable), and guidance (not enforceable) applicable to schools and child cares. Each statute, regulation or guidance is explained in detail in the sections following the table.

Table 1: Regulations and Guidance Governing Lead in ECES Drinking Water

Name	Type	Effective Date	Applicability
Minnesota Statute 121A.335	State Statutory Requirement	2018/2023	All public and charter schools in Minnesota
Minnesota Statute 145.9273	State Statutory Requirement	2023	Licensed child care providers- child care centers
Head Start Policy and Regulations Memo ACF-IM-HS-23-01	Office of Head Start Policy	2022-2023	Head Start programs
Lead and Copper Rule, Revisions, and Improvements (SDWA)	Federal Law and Rule	1991/2007/2021/2023	Directly applies to schools served by their own water source (e.g., well) and serving 25 or more people. Requires PWS to engage with schools and child cares.
Lead Contamination Control Act	Federal Law and Rule	1988	All schools
Reduction of Lead in Drinking Water Act (SDWA)	Federal Law and Rule	2014/2020	All schools
3Ts (Training, Testing and Taking Action formerly Training, Testing and Telling).	Federal Law and Rule	1994/2006/2018	All schools

MN State Statute 121A.335 - Lead in School Drinking Water

Minnesota State Statute 121A.335 requires public and charter schools to have a plan for efficiently and accurately testing for lead in drinking water using the technical guidance/model plan developed by MDE and MDH or by adopting an alternative plan. The law applies in addition to any other current testing requirements.

Under the updated statute, As, schools **must**:

- Adopt the technical guidance/model plan from this document or develop and adopt an alternative plan to accurately and efficiently test for lead in school buildings serving students from prekindergarten to grade 12.
- Create a schedule for testing that includes all school district buildings and charter schools serving students where there is a source of water that may be consumed by students (used in cooking or directly by drinking). Testing must have begun by July 1, 2018, and complete testing of all buildings serving students must be done within five years. **Each tap must be tested at least once every five years thereafter.**

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

- As of August 1, 2023, discontinue use of any sources of water used for consumption that have a level of lead 5 ppb or higher until the hazard has been remediated and verified by a retest to be below 5 ppb.
- If a test has a result of 5 ppb or higher, the school must, within 30 days of receiving the test result, either remediate the presence of lead to below 5 ppb or directly notify parents of the test result.
- Send an annual notice to parents that includes the testing and remediation plan, information on how to find test results, and a description of remediation efforts on the district website. The website must be updated at least annually. In addition to the annual notice, information must be included in an official school handbook or official school policy guide information on how parents may find the test results, and a description of remediation efforts and how often this information is updated.
- Beginning July 1, 2024 – and by July 1 each year thereafter school districts and charter schools must report their test results and remediation activities to MDH. These will then be posted on the MDH website.

The new statute does not create enforcement penalties, violations, or impact licensing when a facility does not meet the timelines or take the required actions. State agencies will reach out to facilities to provide education and outreach on meeting these requirements if they become aware of a facility that is not meeting statutory obligations. Facilities that do not follow the statute may risk losing trust of their community and risk exposing themselves to liability.

The statute is [MN State Statute 121A.335](#).

MN State Statute 145.9273 - Testing for Lead in Drinking Water in Child Care Settings

In 2023, a new state law - Minnesota State Statute 145.9273 - was passed requiring child care centers to test for lead in drinking water in all fixtures used for consumption. The law states that child cares should use the same guidance document schools use to test for lead in drinking water as well as meet remediation and reporting requirements.

By July 1, 2024, licensed or certified child care providers **must**:

- Adopt the technical guidance/model plan from this document or develop and adopt an alternative plan to accurately and efficiently test for lead in drinking water in child care centers;
- Begin testing all sources of water that may be consumed by children (used in cooking or directly by drinking) at least once every five years;
- Discontinue use of any sources of water used for consumption that have a level of lead 5 ppb or higher until the hazard has been remediated and verified by a retest to be below 5 ppb;
- Within 30 days of receipt of results make results of testing available to the public to review and notify the parents and guardians of the availability of the information; and

- Report their test results and remediation activities to MDH by July 1 of each year.

The new statute does not create enforcement penalties, violations, or impact licensing when a facility does not meet the timelines or take the required actions. State agencies will reach out to facilities to provide education and outreach on meeting these requirements if they become aware of a facility that is not meeting statutory obligations. Facilities that do not follow the statute may risk losing trust of their community and risk exposing themselves to liability.

The statute is [MN State Statute 145.9273](#).

Head Start Policy & Regulations Memo ACF-IM-HS-23-01

Head Start programs often must meet both MN State requirements for child care settings and the federal Office of Head Start Policy and Regulations. The federal Office of Head Start Policy and Regulations include memo [ACF-IM-HS-23-01](#) which requires that Head Start programs have a plan to test for lead. This guidance and model plan will meet those requirements.

By July 1, 2024, in order to meet MN State requirements, Head Start programs that are part of a licensed or certified child care provider must meet the requirements of Minnesota State Statute 145.9273 (as described above).

The memorandum is [Head Start ACF-IM-HS-23-01](#).

The Safe Drinking Water Act, Lead and Copper Rule

The federal Safe Drinking Water Act (SDWA) Lead and Copper Rule (LCR) of was first passed in 1991, was updated in 2007, and applies to the public water system (PWS) supplying drinking water to a school building. Public water systems sample for lead following the LCR. The LCR describes actions public water systems are required to take when lead is found at different levels. These levels are not health based. There is no safe level of lead.

Compliance with the LCR is based on the 90th percentile concentration value from samples collected at different points in the PWS. This is a statistical calculation used to determine when a PWS must explore options to reduce lead in the water in the whole system.

Testing under the current LCR is conducted based on a tier system, with the highest priority being individual residences. Therefore, a school or child cares served by a community water supply will not be tested under the LCR. However, if a school or child care has a private well and has 25 or more staff and students, they are classified as a Nontransient Noncommunity PWS and must test for lead under the LCR. Noncommunity Nontransient information is found at [Schools, Offices, Factories, and Child Care \(Noncommunity Nontransient\)](#).

In 2021 and 2023, the Lead and Copper Rule was revised, and then further improvements were proposed. The revisions require public water systems to offer limited testing and provide public education to schools and child cares. This testing would require a water system to identify all schools and licensed child cares that it serves and provide 20% of schools and child cares with testing each year for 5 years. Community water systems will be required to provide five samples per school building and two samples per child care. This testing does not replace state

requirements and is designed to prompt schools to start their own testing programs using state guidance or the EPA 3Ts.

More information on the LCR is available at [Lead and Copper Rule](#).

The full rule is found at [Lead and Copper Rule 40 CFR Part 141 Subpart I](#).

The Lead Contamination Control Act

The Lead Contamination and Control Act (LCCA) - Public Law 100-572 was passed in 1988 and applies to all schools. The intent of the LCCA is to identify and reduce lead in drinking water at schools and relies on voluntary compliance by individual schools and school districts. In particular, it focuses on certain models of water coolers in existence at the time of the law's enactment, while also addressing lead risk reduction generally. Although compliance with the LCCA is voluntary, schools are encouraged to review its recommendations and consider implementation where appropriate. More information on [Lead Water Coolers Banned in 1988 \(PDF\)](#).

The statute is [Lead Contamination Control Act 1988 \(PDF\)](#).

Reduction of Lead in Drinking Water Act

The Reduction of Lead in Drinking Water Act (Public Law 111-380 amending Section 1417 of the Safe Drinking Water Act) became effective in January 2014. This law applies to all schools. The most common source of lead in drinking water is the corrosion of pipes and plumbing fixtures. In an effort to reduce this contamination source, the EPA amended the SDWA to mandate that all pipes, solders, fittings, and fixtures be "lead free." The Act revised the definition of lead free to lower the allowable amount of lead to a weighted average of 0.25% percent of the wetted surfaces of plumbing products and established a statutory method for calculating lead content; it retains a 0.20% lead limit for solder and flux. The law also created exemptions from the lead-free requirements for plumbing products used exclusively for non-potable services as well as for other specified products. All plumbing fittings and fixtures must meet the NSF/ANSI Standard 61, Annex G, [Final "Lead Free" Rule](#).

3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities

The 2018 3Ts guidance indicates that schools should "examine the permanent remediation options and select those most appropriate to their situation" rather than using an arbitrary action limit.

The 3Ts were designed to aid schools with the following:

- Establishing partnerships;
- Determining current water quality;
- Identifying potential problem areas;
- Developing a monitoring plan;

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

- Collecting and submitting water samples;
- Implementing corrective actions if lead is detected in any sample results; and
- Communicating and conducting public outreach.

The guidance is [3Ts for Reducing Lead in Drinking Water Toolkit](#).

Guidance Values of Lead

Lead is still present in many areas of our environment, including materials that were commonly used in plumbing systems. To help understand the risks posed by environmental lead, a variety of guidance values have been developed at different times by different organizations. Some of the values are relatively recent, others much older; some are health-based, while others are for statistical assessment of a water system. Table 2 summarizes guidance values frequently identified with public health protection.

Table 2: Lead in Drinking Water - By the Numbers

Guidance Value: ppb (parts per billion)	Description
0 ppb	EPA has set a maximum contaminant level goal (MCLG) of zero for lead in water. <i>Note: The minimum repeatable detection limits achieved by laboratories today are typically between 0.5 and 2.0 ppb.</i>
1 ppb	The American Academy of Pediatrics recommends this level be used as a standard for school drinking water taps. <i>Note: The minimum repeatable detection limits achieved by laboratories today are typically between 0.5 and 2.0 ppb.</i>
5 ppb	In 2023, Minnesota adopted 5 ppb as the remediation trigger for lead in water in schools and child cares. Illinois, Michigan, and Washington DC use this value as a trigger for schools to implement lead hazard reduction or provide notification. Guidelines for Canadian Drinking Water Quality has proposed this value, as their new Maximum Allowable Concentration. The International Bottled Water Association's (IBWA) <i>Bottled Water Code of Practice</i> established 5 ppb as their finished water quality product standard. The US Food and Drug Administration uses 5 ppb as the quality standard for bottled water.
10 ppb	In 2021 EPA revised the Lead and Copper Rule to add a trigger level at 10 ppb. If more than 10 percent of water system's samples are above the trigger level the system must take required actions to reduce lead by beginning corrosion control, lead service line replacement and increase monitoring across their distribution system. In 2023, EPA has proposed to make 10 ppb the action level for lead. No more than 10 percent of a water system's samples will be allowed to be above this level. If a system would exceed this level, it would trigger lead service line replacement, treatment optimization, and public education steps.

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

Guidance Value: ppb (parts per billion)	Description
15 ppb	<p>In addition to the 10 ppb trigger level the LCR sets an action level with additional required actions systems must take if lead exceeds 15 ppb. No more than 10 percent of a water system's samples are allowed to be above this level, or the system will receive a Notice of Exceedance. However, this is not a health-based value; there is no safe level of lead.</p> <p>Systems are required to provide public education, follow corrosion control treatment steps, and follow mandatory replacement of lead service lines. This action level has not been updated since 1991 although EPA has now added an additional trigger level at 10 ppb. Several states have adopted this value in their school guidance to match the Lead and Copper Rule value.</p> <p>In 2023, EPA has proposed to eliminate 15 ppb as the action level.</p>
20 ppb	<p>This was the trigger value used in EPA's 2006 3Ts. EPA updated their guidance and the new 2018 3Ts document does not contain a specific trigger value for taking action. This value is now rarely used as a trigger. There is no safe level of lead.</p>

State Agency Support for Lead Reduction Activities

MDE

MDE administers the Long-Term Facilities Maintenance Revenue program under Minnesota Statutes, section 123B.595. This program may be utilized to reimburse costs associated with lead testing and remediation. Funding does not cover staff time used to perform daily flushing or water use utility cost associated with flushing procedures. Memoranda from MDE, program guidance documents, spreadsheets and forms used to obtain approval to receive revenue are available at [Long Term Facilities Maintenance](#).



DHS

DHS supports child cares by making several grants available that can help child cares to improve facilities.

More information is available at [DHS Grants and RFPs](#).



Child Care Facility Revitalization Grants are available for facility improvements, minor renovations and related equipment and services, including assistance to meet licensing requirements, needed to establish, maintain, or expand licensed and legal unlicensed child care and early childhood education sites. Grant funds may not be used for construction or major renovation of facilities.

For more information on Child Care Facility Revitalization grants, visit:

- The First Children's Finance [Child Care Facility Revitalization Grants](#);
- Email First Children's Finance at grants@firstchildrensfinance.org; or
- Call (612) 473-6020 for more information.

Child Care Aware Regional Grants are available on a competitive basis, helping child care programs improve the safety and quality of their programs.

For more information on Child Care Aware grants, visit:

- [Child Care Aware - Child Care Service Grants](#); or
- Contact the local grant administrator using [Child Care Aware Contacts - Local Resources](#).



MDH

MDH received a **Water Infrastructure Improvements for the Nation (WIIN) Grant** to develop a lead testing program for eligible schools and child cares. This program is designed to provide sample kits and laboratory analysis for lead in drinking water. Contract assistance with sampling may be available as well. MDH also provides technical assistance to interpret results and provide education about the results to their communities.

For more information visit:

- [WIIN Voluntary School and Child Care Lead Testing and Reduction Program](#); and
- [Minnesota Lead Testing in Schools and Child Care in Drinking Water](#).

MDH **Lead Remediation in Drinking Water in Schools and Child Care Settings Grants** are available for the purpose of remediating identified sources of lead in drinking water in schools and licensed child care settings. This grant funds projects focused on the reduction of lead in drinking water in schools and child care settings. The program prioritizes remediation to facilities with demonstrated high elevated levels of lead.

For more information visit:

- [Lead Remediation in Drinking Water in Schools and Child Care Settings Grant Program](#).

Hydration Station Grants are also available through MDH. MDH is committed to improving the health of Minnesotans by encouraging people to drink more water. Filtered water units, in the form of hydration stations, provide a healthy alternative to sugary drinks, especially in communities with limited access to healthy, affordable beverage choices. Properly certified hydration stations remove lead and other contaminants associated with plumbing materials.

For more information visit:

- [Drinking Water Protection Grant Information](#).



Model Plan for Lead Testing

ECES must complete these steps or formulate a plan that addresses the core concepts of planning, testing, remediating, reporting, and communicating results. An alternative plan must accurately and efficiently test for the presence of lead in water in facilities serving pre-kindergarten students and students in kindergarten through grade 12 and take steps to reduce lead if detected at 5 ppb or above.

If an ECES adopts the model plan, all steps should be implemented. If you have questions, contact MDH at 651-201-4700 for further information.

Required Components of a Model Plan



Step 1. Sampling Program Development



Step 2. Conduct First Draw Tap Sampling



Step 3. Interpret Results



Step 4. Take Corrective Actions (Remediation)



Step 5. Retest



Step 6. Communicate Results



Step 7. Report Results



Step 8. Water Management Plan



Step 1 - Sampling Program Development

A program to assess and sample for lead in drinking water must incorporate, at a minimum, the items in the checklist below:

- ☐ Designate who will inventory water fixtures and collect water samples.
- ☐ Inventory drinking water fixtures. Identify how each fixture is used and identify those used for consumption that will need to be tested. (i.e., drinking water and food preparation).
 - A drinking water fixture is the point of access for people to obtain water for drinking or food preparation. Examples of fixtures include but are not limited to taps, faucets, drinking fountains and water coolers. Drinking water fixtures typically do not include bathroom taps, hose bibbs, laboratory faucets/sinks or custodial closet sinks; these should be clearly marked not for drinking. If a fixture that is accessible to staff or children is not tested, MDH recommends that it be clearly marked with signage or made inaccessible. Signage should take into consideration age of children and languages spoken.
 - Only cold water fixtures should be used for human consumption.
 - Hot water fixtures should never be used to obtain water for drinking water or food preparation.
 - Check all drinking fountains to ensure they are not identified as having a lead-lined tank. More information in [Lead Water Coolers Banned in 1988 \(PDF\)](#).
 - If a drinking fountain within the school is found on this list, it should be removed from use immediately.
 - The inventory should be updated if taps are added or removed.
- ☐ Determine a schedule for sampling.
 - All fixtures used for drinking water or food preparation must be tested at a minimum of once every five years.
 - If budget or resources do not allow all fixtures to be tested in the first year, it is suggested that fixtures be prioritized, with all high priority fixtures tested the first year, medium priority the second, and low priority the third. The fourth year should be used as a “make up” year, if needed.
 - Recommended priority levels are:
 - High priority: fixtures used by children under the age of six years of age or pregnant women (e.g., drinking fountains, nurse’s office sinks, classrooms used for early childhood education and kitchen sinks);
 - Medium priority: other fixtures regularly used to obtain water for drinking or cooking (e.g., Family and Consumer Science sinks, classroom sinks, and teacher’s lounges); and
 - Low priority: other fixtures that could reasonably be used to obtain water for drinking but are not typically used for that purpose.

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

☐ Determine logistics for sampling.

- Water testing should be consistent with the established schedule. Prior to testing it must be determined if school staff or a contractor will conduct the testing.
- If the facility will be doing the testing itself, it will need to contact an accredited laboratory or purchase field testing equipment. If the facility is participating in the WIIN program, MDH will provide appropriate laboratory analysis and supplies for testing.
- Facilities will also need to decide if they will use field analyzers or accredited laboratories to analyze results. Either method is acceptable with appropriate quality control and experience.
- The water in the facility should undergo normal water usage the day before sampling. DO NOT plan to sample during an extended closure. DO NOT conduct pre-stagnation flushing in advance of testing if flushing is not part of your daily building practices.

Option 1: Analysis by an Accredited Laboratory

Laboratory analysis typically involves a school district or consultant contracting with an accredited lab to obtain sample bottles. The laboratory will send instructions for sampling, sample bottles, and a chain-of-custody form to document time and date collected, collector name, and sample location. Table 3 summarizes the limitations and benefits.

Table 3 - Limitations and Benefits of Using an Accredited Laboratory

Limitations	Benefits
Analytical costs. These vary from lab to lab. Currently, typical per sample costs for lead and copper analysis may range from \$20 - \$50, depending on a variety of factors.	District and/or consultant will not need to maintain instrument calibration records.
May take longer to get results than using a field analyzer	Uses a chain-of-custody to ensure integrity of sample analysis process
Typically requires shipping	Analysis done by third-party may provide more independent review/transparency. Accredited labs use EPA-approved methods and have met industry standards for analysis.
	Analysts are certified and trained.

A listing of accredited laboratories may be found at [Accredited Laboratories](#). Figure 1 presents a screen shot from the MDH website on search terms for finding an accredited lab using a customized search.

Program = Safe Drinking Water Program

Analyte = Lead

Matrix = Drinking Water

Accepts samples from private homeowners = Check this box if a family child care or residential address.

Figure 1: Screenshot of Customized Searches from MDH website

Search for Accredited Laboratories - Environmental Laboratory Accreditation Program

Common Searches Customized Searches

Identification:

Laboratory Name:

Location:

State/Province: -- All -- County:

All Other Programs and Test Parameters:

Program: Safe Drinking Water Program

Analyte: Lead

Matrix: Drinking Water

Method: -- All --

Category: -- All --

Technology: -- All --

Accepts samples from private home owners: ☐

Option 2: Analysis Using Field Analyzers

A field analyzer can be a useful tool for quickly and efficiently testing for lead in drinking water. If staff from the facility is doing the sampling or a consultant uses a field analyzer, it is important that limitations and proper use are understood. The field analyzer must be approved by EPA for lead testing in drinking water. Table 4 summarizes the limitations and benefits.

Table 4 - Limitations and Benefits of Using Field Analyzers

Limitations	Benefits
Some analyzers may not measure all forms of lead in drinking water. It is important that the instrument you use measures <i>total</i> lead (particulate and dissolved). If the instrument does not measure all types of lead in drinking water, your result could be biased low.	Get results faster
Staff using an instrument need to ensure that the instrument is properly calibrated and maintained according to manufacturer's specifications, and that records of calibration and maintenance are kept.	Useful when doing large numbers of samples or investigative sampling where many samples might be taken from one fixture
Instruments may require chemicals which will need to be stored and that can expire.	Can be done on-site (no shipping needed)
Field instruments may not have limits of detection that are as low as an accredited laboratory. Be sure that the method you use can identify concentrations as low as 1 ppb.	Can be more cost efficient depending on frequency of use
Some instruments may have interferences with other contaminants and, therefore, under or overestimate the lead level. This may require that additional tests for iron, manganese, hardness, alkalinity, or other contaminants be done prior to use of the field analyzer, to ensure that the instrument will be operated to meet manufacturer's specifications.	

Return to [Required Components of a Model Plan](#)



Step 2 - Conduct First Draw Tap Sampling

Once the plan from Step 1 is set, sampling must be conducted according to the established schedule and priority. Water from fixtures used for drinking or food preparation must be tested for lead using “first draw” samples. First draw means that the samples are collected before the fixture is used or flushed during the day. Use only cold water for collecting lead samples. The order in which samples are collected must be considered to avoid the potential of accidentally flushing a fixture. Always start at fixtures closest to where the water enters the building.

Sample site preparation and sample collection must be performed consistent with the following conditions:

Preparation and Planning

- It may be necessary to collect samples over a number of days to ensure only first draw samples are collected;
- The day before sampling - normal usage of the sampling fixture should occur;

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

- The night before sampling - secure the fixture from being used (e.g., hang a “Do Not Use” sign);
- Do not use sampling fixtures for a minimum of eight hours. MDH recommends not exceeding 18 hours of stagnation time; and
- Do not remove aerators or attachments.

Sample Collection

EPA recommends ECES use a 2-part sampling procedure.



Part 1

Collect a 250 mL first draw sample. Be sure to start sampling at fixtures closest to where the water enters the building so that other fixtures are not accidentally flushed;

Part 2

If the result from Part 1 is high, collect a repeat 250 mL first draw sample as in Part 1. In addition, collect a 30-second flush sample to attempt to identify if the lead is coming from the plumbing behind the fixture and/or if flushing will help reduce lead. To collect a 30-second flush sample, after the water has been stagnant, as in the sample in Part 1, turn on the fixture and allow the water to run for 30 seconds and then fill the sample container.

ECES with active daily flushing programs or considering flushing may want to consider conducting Parts 1 and 2 during the same sampling event to verify flushing effectiveness and reduce the total number of samples that may need to be collected. Collecting these at the same time will also reduce the response time for investigating a high first draw result. Laboratory analysis may take days to weeks depending on lab capacity. If not taking these samples at the same time, and elevated lead levels are found in Part 1, the water **should not be consumed** while preparing follow-up actions. You may want to refer to **Step 5** for additional consideration and guidance responding to high results.

Have samples analyzed by sending to an accredited laboratory or conduct analysis using field analyzers. Be sure to follow instructions from the lab or field analyzer manufacturer.

Special Sampling Considerations

Sometimes there are special fixtures that schools or child cares may have that need additional care and consideration when conducting sampling. Some common special fixtures include ice

makers, in-line coffee makers, and kitchen kettles. Initial sampling for these special situations can be conducted as follows:

Ice Makers: Fill a suitable container (250-mL or larger, wide-mouthed bottle or other container) provided by the laboratory at least three-quarters full of ice. Do not touch the ice with bare hands. Use a non-metal scoop or disposable plastic gloves to place the ice in the container.

In-Line Coffee Makers: These are coffee makers that are directly connected to the building plumbing. These often have a hot water spigot used for dispensing hot water for tea or other beverages. If there is a spigot on the coffee maker, you can collect from the hot water side.

Kitchen Kettles: Many times, these kettles are just used for warming ingredients or food and are not used as a source of water for consumption. If they are labeled as not to be used for consumption and only used for warming, they do not need to be tested. If the kettle is used for consumption and has a spigot that could be used for sampling it can be sampled similar to the in-line coffee makers.



Results for these fixture types need special consideration and review. For guidance on additional samples or sampling after high results the [EPA 3Ts Module 5 \(PDF\)](#) has information on how to find sources of lead in plumbing using advanced sampling techniques to evaluate fixtures.

Return to [Required Components of a Model Plan](#)



Step 3 - Interpret Results

Once an ECES receives its sample results, it should verify that all results are expressed in parts per billion (ppb). For water samples, this will sometimes be stated as micrograms per liter ($\mu\text{g/L}$), which is equivalent to ppb.

Figure 2 presents possible lead hazard reduction options for various lead levels. More comprehensive actions may be necessary to address health threats from higher concentrations. As there is no safe level of lead, it is important to incorporate lead hazard reduction options and communicate at all levels of lead in order to raise awareness and reduce exposure.



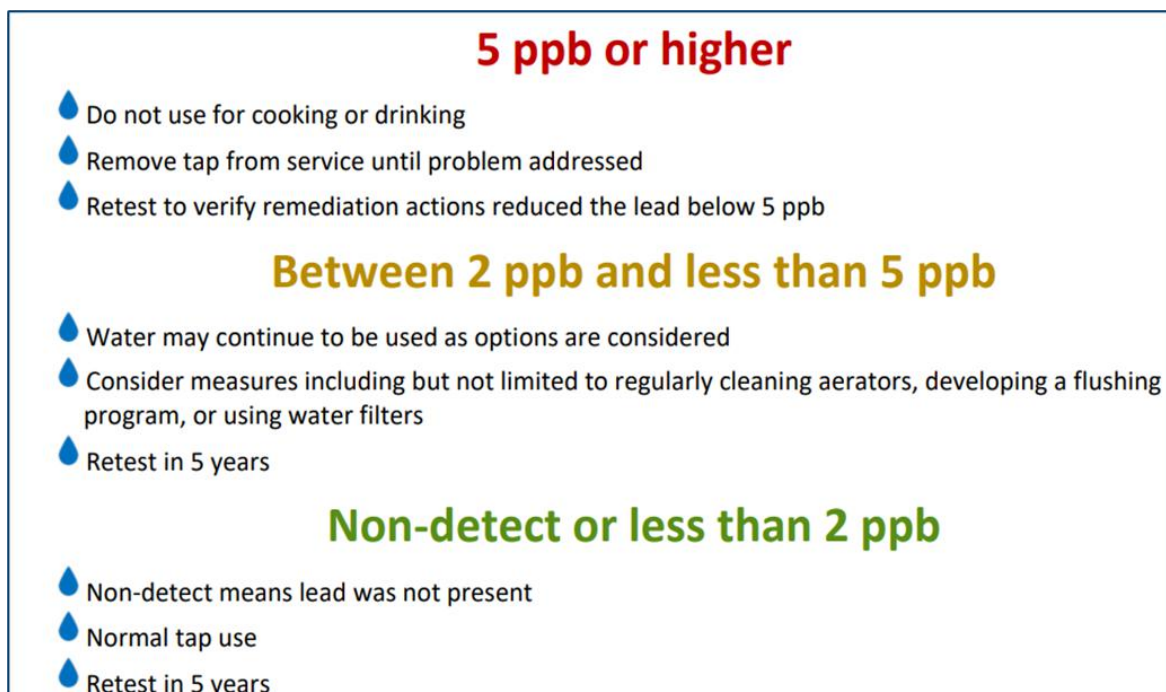
The state of Minnesota has set 5 ppb as the threshold to take remediation steps. **Public schools, charter schools, and child care centers MUST remediate when lead is 5 ppb or higher. MDH recommends that other facilities serving children clearly identify their policy for remediating.**

Guidance on Interpreting Results and Recommended Remediation Options

It is critical to understand that health risks from lead do not abruptly change at varying concentrations of lead. As lead concentrations, the duration of exposure, or the number of fixtures impacted (i.e., distribution) steadily increases, the risks posed to students steadily increase. Response options should consider vulnerability of those exposed, concentration of lead, duration of exposures, and current practices to reduce lead, among other things. A result of 4 ppb is not appreciably safer than a result of 5 ppb.

Mitigation strategies used will depend on the site-specific conditions of the facility such as building age, plumbing materials, water use pattern, incoming water quality, and population served. It may take a combination of options and multiple steps over a period of time to manage/remove lead in drinking water. Analytical results can be highly variable, and a clear pattern should be identified before implementing any strategy. ECES may consider prioritizing strategies to prevent exposures to students and staff most at risk. The following discussion provides the most common hazard reduction options but is not intended to be all-inclusive. EPA's 3Ts guidance document is also an excellent resource for strategies on finding lead sources and implementing mitigation. MDH recommends taking action to minimize lead exposure at every level using a tiered approach as in Figure 2.

Figure 2: Remediation Actions



Return to [Required Components of a Model Plan](#)



Step 4 – Take Corrective Actions (Remediate)

Individual facilities vary tremendously across the state, it is imperative that final decisions on corrective actions are driven by local conditions and considerations. Actions that may be ideal in one ECES may not be appropriate for another setting.

The recommendations in this section were compiled to assist ECES in choosing the best lead hazard reduction option to reduce exposure to lead in their ECES. Options may be implemented individually, in combination, or not at all, depending on the specific situation at an individual ECES. Because no two facilities are exactly alike, best management practices will likely vary across the state.

In addition to possible remediation options outlined in Figure 2, the options further described here are in priority order (with the highest priority listed first and lowest priority last) of long-term effectiveness in reducing lead hazards. Even when lead is detected at very small levels it shows that there is room to examine best practices such as changing or implementing routine maintenance strategies. **For additional information, see Appendix D: Detailed Fixture Evaluation found on page 59 of the 2018 [3Ts Revised Manual \(PDF\)](#).**

Option 1: Removal and/or Replacement of Lead Sources

Removal of sources of lead is the preferred way to remediate. Engineering plans and specifications for the plumbing system are useful for identifying sources of lead and helpful in determining if sources of lead can be removed from service or replaced with lead free fixtures. Options for eliminating lead sources include:

- Remove fixture from service. If the fixture is seldom used, it may be disconnected or removed from the water supply line, but first verify the fixture is not required for local building code compliance;
- Replace with lead-free fixture/plumbing component;
- If the existing fixture is suspected to be the source of contamination, replace with a lead free fixture;
- Replace other sources of lead, including lead pipe, lead solder joints, and brass plumbing components with lead free materials; and
- To minimize the introduction of lead into drinking water systems, go to EPA's website to identify lead free certification marks for drinking water systems and plumbing materials. More information can be found in [How to Identify Lead Free Certification Marks for Drinking Water System & Plumbing Products](#).

Picture of a Scratch on
a Lead Service Line



Option 2: Implement a Flushing Program

Flushing the drinking water fixtures (letting the water run for a set amount of time on a regular basis) can effectively reduce lead concentrations in drinking water. A flushing program works to reduce lead concentrations by clearing the fixtures of water that has been in contact with plumbing components that may contain lead. While flushing can work to reduce lead, it requires staff time, diligence, and commitment to ensure effectiveness. Verify the effectiveness of your flushing program by conducting follow up lead testing.



Flushing programs do not remove the source of lead from buildings and must be continuously followed to prevent lead from building up.

A facility should develop standard operating procedures to conduct flushing that it maintains onsite and should ensure that facility staff are aware of the responsibility and importance of maintaining flushing programs. Flushing programs are a water management strategy and can work to maintain high quality of water by reducing corrosion, maintaining chlorine residual, and if your public water system uses corrosion control treatment (such as orthophosphate) it can help bring this treatment through your buildings to protect plumbing materials. Flushing programs can also help with legionella management. Warm, stagnant water can be an incubator for legionella and other biological activity.

There are two primary types of flushing programs:
Individual Tap Flushing and Main Pipe Flushing

Individual Tap Flushing Program

- May be implemented if lead concentrations are found to be high at certain fixtures.
- Flush individual fixtures that have been tested and found to have high lead levels. This procedure is to be followed each day the facility is in session.
- During periods of normal use:
 - Run each fixture in the morning before children arrive and again at midday. Site-specific conditions will determine how long a fixture needs to be flushed and the number of times a day a fixture needs to be flushed. Refer to [3Ts Flushing Best Practices \(PDF\)](#) for guidance on flushing.
 - Periodic testing may be done prior to and after the midday flushing to ensure the lead concentrations have remained low throughout the morning hours. If they have not, the flushing time should be increased, or another option should be implemented.
 - After weekends or breaks, run each fixture for ten to fifteen minutes before children return to the facility, then return to normal use; and
 - Frequency and duration of flushing should be reasonably documented.

Main Pipe Flushing Program

- May be implemented if lead concentrations are found to be high throughout the entire facility or confined to a certain area of the facility. This procedure is to be followed each day the facility is in session;
- Begin by flushing the fixture furthest away from the water source for at least ten minutes;
- Next flush the fixture the second furthest away and continue in this manner until all have been flushed;
- Flushed samples should be periodically collected and analyzed for lead to confirm the effectiveness of flushing programs;
- It is recommended that midday samples and end of the day samples be taken periodically to ensure the lead concentrations have remained low throughout the day. If they have not, another option should be implemented; and
- Review the results upon receipt and continue to optimize the procedure to reduce lead.

More on Flushing

Flushing is a best management practice used to reduce lead levels by controlling the age of the water. It can be an interim or long-term option. This guidance presents flushing procedures that MDH has found effective in reducing the lead level in drinking water. Site-specific conditions will determine how long a fixture needs to be flushed and the number of times a day a fixture needs flushing. The key to using flushing as a best management practice is monitoring that demonstrates the lead level has been reduced.

Flushing can be done manually or can be automated with flushing devices. Flushing done for the purposes of lead reduction needs to be done and tracked at a fixture level. Manual flushing can take significant staff time depending on the size of the building and scope of flushing needed. Automatic flushing can help reduce the time needed to flush individual fixtures or be part of a routine water management plan.

Note that facilities implementing a flush program may wish to identify non-consumptive uses for the flushed water (watering plants, cleaning, etc.) in order to make use of this resource.

If a flushing program is stopped, MDH recommends the facility document why it stopped flushing and complete lead testing within 3 months of stopping the flushing program to assess any impacts to lead levels in drinking water. Flushing as a remediation option is only effective if it continues to be implemented consistently.

Option 3: Cleaning Aerators

Cleaning aerators is a routine maintenance strategy that can help reduce lead levels if implemented consistently. Aerators are screens located at the end of some fixtures. Cleaning aerators once after a high lead test will not prevent lead levels from increasing later.

- As a routine maintenance strategy we recommend cleaning aerators once every 6 months or once per quarter.
- Clean aerators more often if visible build up or changes to water flow are observed.
- If aerator cleaning is used as a remediation strategy, retest to make sure it was effective and implement a regular cleaning program to ensure lead does not build up again.
- Cleaning aerators does not remove the source of lead from the plumbing. Removing aerators so that they do not have to be cleaned can be an option but will impact the water usage and flow of the water through the fixtures.



Picture of an aerator with particulate

Option 4: Treatment

Point-of-Use (POU) Treatment Device

A POU water treatment device may be installed at fixtures where lead has been detected. These include reverse osmosis, on-sink water filters, filtered hydration stations, pitcher filters, and other devices. A POU device should be approved to meet NSF Standard 53, NSF Standard 58, or an equivalent standard along with a claim of lead reduction. The device must be installed, operated, and maintained in accordance with the manufacturer's recommendations. **POU treatment systems may be subject to Department of Labor and Industry (DLI) or local administrative authority plan review and approval prior to installation. Contact DLI at (651) 284-5063 for more information.** For some examples of home treatment options that will reduce lead in drinking water see [Home Water Treatment factsheet](#).

Check that the device you are using is NSF certified for lead reduction at: [NSF Certified Drinking Water Treatment Units, Water Filters](#).

Point of Entry (POE) Chemical Treatment

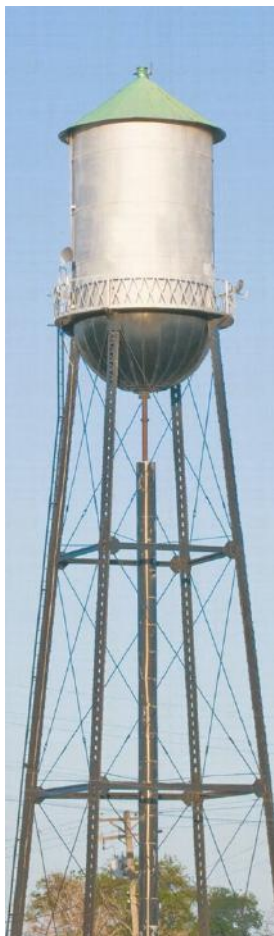
POE chemical treatment involves adjusting the water chemistry which may reduce the amount of lead absorbed by the water. This may be done by adding a chemical to the water as it enters the building. Typical methods of chemical treatment include addition of a phosphate-based or silica-based corrosion inhibitor or an adjustment to the water's pH or hardness. These chemicals provide a protective barrier along the pipes (pipe scale) that prevents lead from getting into the water. **All chemical treatment systems are subject to MDH plan review and approval prior to installation.** In addition, a school that installs POE corrosion control treatment becomes a public water system and is required to meet the regulatory requirements of the SDWA. If classified as a public water system, the school is responsible for meeting all of the water quality standards of the SDWA, is subject to inspection of the water distribution system, and is required to have a certified water operator.

POE chemical treatment does not take away the need for a water management or flushing program to ensure treatment consistency throughout the building. In parts of facilities with low water usage it may still be possible for elevated lead levels to be detected.



Contact the Minnesota Department of Health Drinking Water Protection Program at **651-201-4700** to determine if additional requirements will apply to your school prior to installing treatment.

Building Relationships with your Public Water System



If the ECES receives its water from a municipal water supply, the ECES is encouraged to work with them to assess the source contribution of lead coming into the ECES and if the ECES has a lead service line.

Most ECES obtain their water from a public water system or municipal water supply. ECES should maintain good relationships with their water system.

1. Contact the water system if you have questions or concerns about your incoming water quality. If there are sudden changes in taste, odor, or color the water system is the best contact to help you address those concerns.
2. Check with your water system to see if your facility has a lead service line, lead gooseneck, or galvanized steel service line. These lines may need to be replaced and coordinating with the city is the best way to ensure the whole line is fully removed. The city may have funds available to assist in removal of these lines.
3. Community water systems report their annual water quality in a Consumer Confidence Report that is available every year. Search for your [Consumer Confidence Report \(CCR\)](#). Water systems will also notify their customers if there is a water quality problem that requires special actions (flushing, boiling etc.). Be sure you know how your water system will communicate concerns to your organization.

It is rare for lead to be coming from the public water supply itself; most lead in drinking water comes from corrosion of plumbing materials such as service line or premise plumbing. For ECES on their own well, the only way to characterize lead contribution from the water source is to do a test of water coming into the building.

Return to [Required Components of a Model Plan](#)



Step 5 – Retest

All fixtures affected by a lead hazard reduction action must be retested to confirm the remediation action was effective at lowering the level of lead below 5 ppb. A first draw sample is to be taken using the procedure outlined in Step 2. If a flushing program was not implemented as part of the remediation, you may also want to collect a flushed sample(s) to identify if flushing would be helpful for reducing lead in the facility.

Interpreting Results after Implementing Remediation Actions

Different facilities will choose different actions or combine actions. It is very common to combine aerator cleaning and flushing for example.

- If the analysis does not detect lead or lead is less than 5 ppb, no further action is required, as long as the remediation or water management option remains in place. The next sample should be collected within five years.
- If the analysis shows lead remains present and is still at or above 5 ppb: A new remediation option can be implemented followed by retesting as specified in Step 2.
- When evaluating flushing both first draw and midday samples should be evaluated to ensure that lead levels do not rebound during the day. If lead remains present after flushing, additional options such as filters, or fixture removal/replacement may be necessary.

If results show persistent elevated lead levels, testing/remediation should continue until the lead source is found and hazard reduction options implemented. The overall goal is to have the state agencies, ECES, parents, and students all work together to ensure that available resources are best targeted to minimize exposure to lead in drinking water.

Return to [Required Components of a Model Plan](#)



Step 6 - Communicate Results

Schools

[MN State Statute 121A.335](#) creates a communication requirement for schools as follows:

“(a) A school district or charter school must send parents an annual notice that includes the district's or charter school's annual testing and remediation plan, information about how to find test results, and a description of remediation efforts on the district website. The district or charter school must update the lead testing and remediation information on its website at least annually. In addition to the annual notice, the district or charter school must include in an official school handbook or official school policy guide information on how parents may find the test results and a description of remediation efforts on the district or charter school website and how often this information is updated.

(b) If a test conducted under subdivision 3, paragraph (a), reveals the presence of lead at or above five parts per billion, the school district or charter school must, within 30 days of receiving the test result, either remediate the presence of lead to below five parts per billion, verified by retest, or directly notify parents of the test result.”

In addition to testing for lead and meeting the remediation requirements, a lead hazard reduction program should include a comprehensive communication plan. The purpose of a communication plan is to provide a process for school employees, students, and parents to address questions, report results, share remediation actions and provide ongoing, up-to-date information regarding sampling efforts.

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

School management should:

- Assign a designated person(s) to be the contact.
- Notify affected individuals about the availability of the testing and results; in a period not to exceed 30 days. School employees, students, and parents should be informed and involved in the communication process. Results of initial and any follow-up testing should be easily accessible along with documentation of lead hazard reduction options.
- Posting the information on a website is preferred, but the information should also be available to those without easily accessible internet access. Examples of other information venues are meetings, open houses, and public notices.
- Whenever lead is detected, identify and share specific activities taken to minimize lead exposure by following the guidance in Figure 2 or refer to EPA 3Ts for additional remediation strategies.

MDE and MDH have developed an [Education and Communication Toolkit A Technical Guidance and Model Plan for Minnesota's Public Schools \(PDF\)](#) to aid schools in implementing this technical guidance/model plan.

Child Care Centers



[MN Statute 145.9273](#) creates a communication requirement for child care centers as follows:

“A licensed or certified child care provider that tested its buildings for the presence of lead shall make the results of the testing and any remediation steps taken available to parents and staff and notify them of the availability of results. Reporting shall occur no later than 30 days from receipt of results and annually thereafter.”

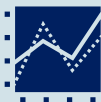
Head Start programs that are classified as a licensed or certified childcare provider must make the results of testing and remediation steps taken available to parents and staff and notify them of the availability of the results. Reporting shall occur no later than 30 days from receipt of results and annually thereafter.

A facility that is sampling once every 5 years would share the old results each year until it tests again. The [Education and Communication Toolkit: Reducing Lead in Drinking Water in Child Care Settings \(PDF\)](#) will assist child care settings in implementing this technical/guidance.

Other Facilities

There are no requirements for private schools, family child care providers, or other institutions that voluntarily choose to conduct lead testing in drinking water to communicate results. Best practice is for locations that test for lead in drinking water make results available to anyone that asks for the results or that may be drinking the water such as staff, students, parents, etc. When facilities proactively communicate about the work they are doing to keep children and staff safe from lead in drinking water it builds trust and accountability.

Return to [Required Components of a Model Plan](#)



Step 7 - Report Results

Reporting templates will be posted when MDH is ready to accept submissions.

Schools

[MN State Statute 121A.335](#) creates a reporting requirement for schools as follows:

(c) Starting July 1, 2024, school districts and charter schools must report their test results and remediation activities to the commissioner of health in the form and manner determined by the commissioner in consultation with school districts and charter schools, by July 1 of each year. The commissioner of health must post and annually update the test results and remediation efforts on the department website by school site.

(d) A district or charter school must maintain a record of lead testing results and remediation activities for at least 15 years.

Keeping records is useful for identifying trends/anomalies in results at any drinking water fixtures or in the school distribution system as a whole.



Child Care Centers

[MN Statute 145.9273](#) creates a reporting requirement for child care centers as follows:

(b) Beginning July 1, 2024, a licensed or certified child care provider must report the provider's test results and remediation activities to the commissioner of health annually on or before July 1 of each year.

Head Starts

Many Head Start programs are classified as child care centers or are located within a school program. These child cares would be required to report results to MDH. Head Start programs that do not meet these requirements would not have to report results to MDH.

Others

Public schools, charter schools, and child care centers are the only facilities that must report their lead results and remediation actions to MDH annually beginning July 1, 2024. Schools and child care centers have different reporting requirements. Use the spreadsheet template and instructions listed below to report results to MDH.

- [Results and Remediation Reporting Instructions and FAQ \(PDF\)](#)
- [Lead Results and Remediation Reporting Spreadsheet \(Excel\)](#)

Other facilities are encouraged to make results readily available to parents and staff but are not required to report the results.

Return to [Required Components of a Model Plan](#)



Step 8 – Water Management Plan

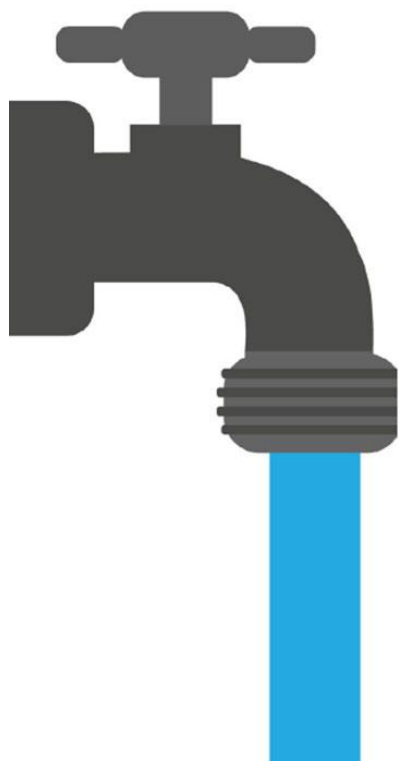
[MN State Statute 121A.335](#) states:

(b) By July 1, 2024, a school district or charter school must revise its plan to include its policies and procedures for ensuring consistent water quality throughout the district's or charter school's facilities. The plan must document the routine water management strategies and procedures used in each building or facility to maintain water quality and reduce exposure to lead. A district or charter school must base the plan on the United States Environmental Protection Agency's "Ensuring Drinking Water Quality in Schools During and After Extended Closures" fact sheet and the United States Environmental Protection Agency's "3Ts Toolkit for Reducing Lead in Drinking Water in Schools and Child Care Facilities" manual. A district or charter school's plan must be publicly available upon request.

A water management plan is a helpful tool for ECES to use to maintain and improve facility water quality. Every building is different, and the scope of a water management plan may look vastly different from a small building to a large building or campus-style facility.

Key components of water management plan include:

1. Identify all water fixtures and identify how they are used. This will help determine which fixtures you will test for lead and which fixtures should be labeled/posted for non-consumption. Identifying fixtures will also help identify hazards.
2. Identify areas of concern where lead levels are likely to be highest or where biological activity may be a concern (warm, stagnant water).
3. Decide what routine maintenance strategies (engineering controls) should be used and how to access their effectiveness (lead testing, chlorine testing, pH, temperature, etc.). This will be highly specific to your building.
4. Decide how you will intervene when assessments reveal that controls are not being met.
 - a. Ex. A lead test was above 5 ppb at an old fixture. Intervention: Replaced with a new fixture and retested showing non-detect for lead.



- b. Ex. Biofilm/pipe scale was observed on a faucet. Intervention: The faucet and aerator were cleaned and flushed.
 - c. Ex. A weekly chlorine test shows no detected chlorine residual in area not used frequently. Intervention: Flushing was done until a chlorine residual was observed. Chlorine was tested daily for several days to ensure the regular flushing protocol was working.
 - d. Ex. Hot water lines are not hot. This is a hazard because when hot water is allowed to cool it can provide growth for bacteria. Intervention: Temperature regulator and mixing valves were checked. A mixing valve was broken, after repair the problem was corrected.
5. Make sure the program is running as designed and is effective.
6. Document and share results.

The larger the building and more complex the plumbing system is the more information and details may be needed in your water management plan.

Resources for building water management plans include:

- [Developing a Water Management Program to Reduce Legionella Growth & Spread in Buildings \(PDF\)](#); and
- [Ensuring Drinking Water Quality in Schools During and After Extended Closures](#).

Return to [Required Components of a Model Plan](#)

Glossary of Terms and Acronyms

Aerator - An aerator is found at the tip of the faucet. Aerators are screwed onto the faucet head, creating a non-splashing stream, and delivering a mixture of water and air.

Child Cares - A licensed or certified child care provider is a child care center licensed under Minnesota Rules, chapter 9503, or a certified license-exempt child care center under chapter 245H.

Corrosion - A dissolving and wearing-away of metal caused by a chemical reaction between water and plumbing materials in contact with the water.

Department of Human Services (DHS) - Minnesota Department of Human Services, state agency that regulates child cares.

Detected - An amount of lead above the detection level. A concentration of lead analyzed with a certainty of precision to be at or above the detected level.

Detection Level (DL) - The lowest concentration of lead that can be analyzed with a certainty of precision. Results below this level are often expressed as “non-detected,” “nd,” or “<DL.” For the purposes of this document, 2 ppb is the maximum detection level recommended for lead analysis.

Drinking Water Faucet/Tap - Point of access for people to obtain water for drinking or food preparation. A faucet/tap can be a fixture, faucet, drinking fountain or water cooler. Drinking water taps typically **do not** include bathroom taps, hose bibs, laboratory faucets/sinks or custodial closet sinks when clearly marked as not for drinking water or food preparation.

EPA 3Ts – Environmental Protection Agency 3Ts for Reducing Lead in Drinking Water is a guidance document to help schools and child care facilities implement a program for reducing lead in drinking water. The document focuses on training, testing, and taking action.

Federal Safe Drinking Water Act (SDWA) – Federal law regulating the nation’s public drinking water supply.

Field Analyzer - Instrument suitable for water quality analysis in the field and will provide results without the use of a laboratory.

First Draw Sample - The first water drawn from a fixture after the water has sat undisturbed in the plumbing system for at least eight hours.

Fittings - Plumbing components used to join sections of pipe or to join pipe to fixtures.

Fixture - Exchangeable device connected for the distribution and use of water in a building. Examples: drinking fountain, sinks, shower, tub, toilet, hydrant.

Flush(ing) - Running the water at a fixture or combination of fixtures to clear standing water from the plumbing system.

Flush Sample - A water sample that has been collected following the flushing of a drinking water fixture.

Flux - A substance applied during soldering to facilitate the flow of solder. Flux used prior to 1986 contains lead and can itself be a source of lead contamination in water.

Lead-Free - Weighted average of not more than 0.25% lead in wetted surface material for pipe, pipe and plumbing fittings and fixtures, and 0.2% lead for solder and flux.

Limit of Detection (LOD) - The lowest quantity of a substance that can be distinguished from the absence of the substance due to the instrument's analytical process. It is usually lower than the detection level.

Minnesota Department of Education (MDE) - State public education agency.

Minnesota Department of Health (MDH) - State public health agency.

National Standards (NSF) - Authority for health standards, testing, certification, consulting and training for food, water, health products, and the environment.

Non-Detect - A lead result below the limit of detection, often expressed as "non-detected," "nd," or "<DL."

Parts per Billion (ppb) - A standard unit of measurement commonly used to describe the concentration of lead in drinking water. Also expressed as micrograms/liter ($\mu\text{g/L}$).

pH - A logarithmic measure of acidity and alkalinity between 0 (highly acidic) and 14 (highly basic); 7 is neutral.

Point of Entry (POE) - A water treatment device installed to treat all water entering a single school, building, facility or home. Example: water softener.

Point of Use (POU) - A water treatment device intended to treat water for direct consumption, typically at a single fixture or a limited number of fixtures. Example: faucet-mount cartridge filter.

Primary Prevention - aims to prevent disease or injury before it ever occurs. It is done by preventing exposures to hazards that cause disease or injury, altering unhealthy or unsafe behaviors that can lead to disease or injury, and increasing resistance to disease or injury should exposure occur.

Public Water System (PWS) - A system that has at least 15 service connections or regularly serves an average of 25 individuals daily at least 60 days out of the year.

- **Community Public Water System (CPWS)** - A PWS which serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents. Examples: municipalities, manufactured mobile home parks.
- **Nontransient Noncommunity (NTNC) Public Water System** - A PWS that is not a CPWS and that regularly serves at least 25 of the same persons over 6 months per year. Examples: schools, child care centers, factories.

Schools - Minnesota's public and charter schools serving students in pre-kindergarten through grade 12.

Service Connection - The pipe that carries fixture water from the public water main to a building.

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR
MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

Solder - A metallic compound used to seal the joints between pipes. Until 1988, solder containing up to 50% lead was legally used in potable water plumbing. Lead free solders, which can contain up to 0.2% lead, often contain one or more of the following metals: antimony, tin, copper, or silver.

Technical Guidance/Model Plan - The plan developed by the commissioners of health and education to accurately and efficiently test for the presence of lead in drinking water in public school buildings, as required under [MN State Statute 121A.335](#) and [MN State Statute 145.9273](#).

United States Environmental Protection Agency (EPA) - Federal agency with a mission to protect human health and the environment; oversees implementation of the SDWA.

Water Infrastructure Improvements for the Nation (WIIN) - A federal grant from the EPA to states to develop and implement a lead testing program for eligible schools and child cares. This program is designed to provide sample kits and laboratory analysis for lead in drinking water.

References

Applicable references are listed in the order they appear in the document.

- [MN Rules, part 121A.335 Lead in School Drinking Water \(https://www.revisor.mn.gov/statutes/cite/121A.335\)](https://www.revisor.mn.gov/statutes/cite/121A.335)
- [MN Rules, part 145.9273 Testing for Lead in Drinking Water in Child Care Settings \(https://www.revisor.mn.gov/statutes/cite/145.9273\)](https://www.revisor.mn.gov/statutes/cite/145.9273)
- [Centers for Disease Control and Prevention - Childhood Lead Poisoning Prevention \(https://www.cdc.gov/nceh/lead/\)](https://www.cdc.gov/nceh/lead/)
- [MDH Lead Program \(https://www.health.state.mn.us/communities/environment/lead/index.html\)](https://www.health.state.mn.us/communities/environment/lead/index.html)
- [How to Identify Lead Free Certification Marks for Drinking Water System & Plumbing Products \(https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100LVYK.txt\)](https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100LVYK.txt)
- [Ensuring Drinking Water Quality in Schools During and After Extended Closures \(PDF\) \(https://www.epa.gov/sites/default/files/2021-03/documents/us_epa_schools_extended_closures_factsheet_508_3-4-2021_0.pdf\)](https://www.epa.gov/sites/default/files/2021-03/documents/us_epa_schools_extended_closures_factsheet_508_3-4-2021_0.pdf)
- [The Role of Head Start Programs in Addressing Lead in Water ACF-IM-HS-23-01 \(https://eclkc.ohs.acf.hhs.gov/policy/im/acf-im-hs-23-01\)](https://eclkc.ohs.acf.hhs.gov/policy/im/acf-im-hs-23-01)
- [Schools, Offices, Factories, and Child Care \(Noncommunity Nontransient\) \(https://www.health.state.mn.us/communities/environment/water/noncom/nontransient.html\)](https://www.health.state.mn.us/communities/environment/water/noncom/nontransient.html)
- [Lead and Copper Rule \(https://www.epa.gov/dwreginfo/lead-and-copper-rule\)](https://www.epa.gov/dwreginfo/lead-and-copper-rule)
- [Lead and Copper Rule 40 CFR Part 141 Subpart I \(https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141#subpart-I\)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141#subpart-I)
- [Lead Water Coolers Banned in 1988 \(PDF\) \(https://www.epa.gov/sites/production/files/2018-09/documents/module_4_lead_water_coolers_banned_in_1988_508.pdf\)](https://www.epa.gov/sites/production/files/2018-09/documents/module_4_lead_water_coolers_banned_in_1988_508.pdf)
- [Lead Contamination Control Act 1988 \(PDF\) \(https://www.epa.gov/sites/default/files/2015-09/documents/epalccapamphlet1989.pdf\)](https://www.epa.gov/sites/default/files/2015-09/documents/epalccapamphlet1989.pdf)
- [Final "Lead Free" Rule \(https://www.epa.gov/sdwa/use-lead-free-pipes-fittings-fixtures-solder-and-flux-drinking-water\)](https://www.epa.gov/sdwa/use-lead-free-pipes-fittings-fixtures-solder-and-flux-drinking-water)
- [3Ts for Reducing Lead in Drinking Water Toolkit \(https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water-toolkit\)](https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water-toolkit)
- [Guidelines for Canadian Drinking Water Quality \(https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidelines-canadian-drinking-water-quality-guideline-technical-document-lead.html\)](https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidelines-canadian-drinking-water-quality-guideline-technical-document-lead.html)
- [Long Term Facilities Maintenance \(https://education.mn.gov/MDE/dse/schfin/fac/ltfm/\)](https://education.mn.gov/MDE/dse/schfin/fac/ltfm/)
- [DHS Grants and RFPs \(https://mn.gov/dhs/partners-and-providers/grants-rfps/\)](https://mn.gov/dhs/partners-and-providers/grants-rfps/)

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR
MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

- [Child Care Facility Revitalization Grants \(https://www.firstchildrensfinance.org/for-businesses/grants/\)](https://www.firstchildrensfinance.org/for-businesses/grants/)
- [Child Care Aware - Child Care Service Grants \(http://childcareawaremn.org/professionals-caregivers/grants-scholarships/ccrr-grants\)](http://childcareawaremn.org/professionals-caregivers/grants-scholarships/ccrr-grants)
- [Child Care Aware - Local Resources \(http://childcareawaremn.org/local-resources\)](http://childcareawaremn.org/local-resources)
- [WIIN Grant: Voluntary School and Child Care Lead Testing and Reduction Program \(https://www.epa.gov/dwcapacity/wiin-grant-lead-testing-school-and-child-care-program-drinking-water\)](https://www.epa.gov/dwcapacity/wiin-grant-lead-testing-school-and-child-care-program-drinking-water)
- [Minnesota Lead Testing in Schools and Child Care in Drinking Water \(https://www.health.state.mn.us/communities/environment/water/schools/mngrant.html\)](https://www.health.state.mn.us/communities/environment/water/schools/mngrant.html)
- [Lead Remediation in Drinking Water in Schools and Child Care Settings Grant Program \(https://www.health.state.mn.us/communities/environment/water/com/leadremgrant.html\)](https://www.health.state.mn.us/communities/environment/water/com/leadremgrant.html)
- [Drinking Water Protection Grant Information \(https://www.health.state.mn.us/communities/environment/water/com/grants.html\)](https://www.health.state.mn.us/communities/environment/water/com/grants.html)
- [Accredited Laboratories \(http://www.health.state.mn.us/labsearch\)](http://www.health.state.mn.us/labsearch)
- [EPA 3Ts Module 5 \(PDF\)\(https://www.epa.gov/system/files/documents/2021-08/module_5_detailed_fixture_evaluation_508.pdf\)](https://www.epa.gov/system/files/documents/2021-08/module_5_detailed_fixture_evaluation_508.pdf)
- [3Ts Revised Manual \(PDF\) \(https://nepis.epa.gov/Exe/ZyPDF.cgi/P100VLI2.PDF?Dockey=P100VLI2.PDF\)](https://nepis.epa.gov/Exe/ZyPDF.cgi/P100VLI2.PDF?Dockey=P100VLI2.PDF)
- [3Ts Flushing Best Practices \(PDF\) \(https://www.epa.gov/sites/default/files/2018-09/documents/flushing_best_practices_factsheet_508.pdf\)](https://www.epa.gov/sites/default/files/2018-09/documents/flushing_best_practices_factsheet_508.pdf)
- [Home Water Treatment Fact Sheet \(https://www.health.state.mn.us/communities/environment/water/factsheet/hometreatment.html\)](https://www.health.state.mn.us/communities/environment/water/factsheet/hometreatment.html)
- [NSF Certified Drinking Water Treatment Units, Water Filters \(https://info.nsf.org/Certified/dwtu/\)](https://info.nsf.org/Certified/dwtu/)
- [Consumer Confidence Report \(CCR\) \(https://mnccr.web.health.state.mn.us/index.faces\)](https://mnccr.web.health.state.mn.us/index.faces)
- [Education and Communication Toolkit A Technical Guidance and Model Plan for Minnesota's Public Schools \(PDF\) \(https://www.health.state.mn.us/communities/environment/water/docs/toolkit.pdf\)](https://www.health.state.mn.us/communities/environment/water/docs/toolkit.pdf)
- [Education and Communication Toolkit: Reducing Lead in Drinking Water in Child Care Settings \(PDF\) \(https://www.health.state.mn.us/communities/environment/water/docs/toolkitccare.pdf\)](https://www.health.state.mn.us/communities/environment/water/docs/toolkitccare.pdf)
- [Results and Remediation Reporting Instructions and FAQ \(PDF\) \(https://www.health.state.mn.us/communities/environment/water/docs/reportinstfaq.pdf\)](https://www.health.state.mn.us/communities/environment/water/docs/reportinstfaq.pdf)

REDUCING LEAD IN DRINKING WATER: A TECHNICAL GUIDANCE FOR
MINNESOTA'S SCHOOL AND CHILD CARE FACILITIES

- Lead Results and Remediation Reporting Spreadsheet (Excel)
(<https://www.health.state.mn.us/communities/environment/water/docs/leadreporttemplate.xlsx>)
- Developing a Water Management Program to Reduce Legionella Growth & Spread in Buildings (PDF) (<https://www.cdc.gov/legionella/downloads/toolkit.pdf>)