



March 4, 2025

Minnesota Senate Education Policy Committee  
95 University Avenue W.  
Minnesota Senate Bldg., Room 3207  
St. Paul, MN 55155

Dear Members of the Senate Education Policy Committee:

The Legal Services Advocacy Project (LSAP) appreciates the opportunity to provide written testimony on SF2078 and to share our serious concerns with the proposal.

LSAP and the Minnesota Disability Law Center (MDLC) are statewide projects of Mid-Minnesota Legal Aid. MDLC provides free legal services to children and adults with disabilities. LSAP is the advocacy arm of Legal Aid and has provided legislative and administrative advocacy on behalf of Minnesotans with low incomes since 1977.

Legal Aid is committed to ensuring all Minnesota children with disabilities have access to a free appropriate public education and high-quality opportunities for growth. As such, Legal Aid works to ensure that those policies and processes that protect the rights of children with disabilities are meaningful and effective.

Section 2 of SF2078 eliminates the requirement for benchmarks and short-term objectives as part of the statement of an annual goal in an IEP. Eliminating short-term objectives and goals ignores the ways children learn and grow and the fluid ways in which new barriers may appear during a school year, which necessitate different strategies and supports. This change also removes a powerful component of progress transparency for parents and caregivers. If a parent or caregiver is waiting 12 months for a progress report, earlier opportunities for support and intervention may have been missed.

In addition, removing the requirement for benchmarks and short-term objectives for all children with IEPs violates the federal Individuals with Disabilities in Education Act (IDEA), which requires IEP goals to include benchmarks or short-term objectives for children with disabilities who take alternate assessments aligned to alternate achievement standards. 34 CFR 300.320 (a)(2).

As Legal Aid has testified in other forums, the IEP process is often complicated and arcane for families. We also acknowledge it's a demanding process for staff because it serves the critical purpose of ensuring children with disabilities have access to the free appropriate public education to which they are entitled under the law.

Legal Aid respectfully requests the Legislature further consider those efforts to make the IEP process more accessible (not less accessible) for parents and caregivers and to also consider bolstering efforts and supports that give staff the time they need to meaningfully engage in the process.

Sincerely,  
Jessica L. Webster  
Staff Attorney  
Legal Services Advocacy Project