
Blue Ribbon Commission on Special Education

Recommendations to the Minnesota Legislature

September 2026

As required by Minnesota Statutes 2025, 1st Spec. Sess. chapter 10, article 7, subdivision 7

Authors and acknowledgements

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Upon request, this material will be made available in an alternative format such as large print, braille or audio recording. Printed on recycled paper.

Table of Contents

Background.....	5
Introduction to the charge	6
Commission consensus informing decision-making.....	7
Recommendations.....	8
Recommendation regarding the overall charge.....	8
Recommendations to improve special education efficiency, access, and quality	11
Longer-term system change recommendations to improve special education quality and sustainability	13
Conclusions.....	14
References	15
Appendix.....	16
Letters from Commission Members.....	16
Tables.....	23
Glossary	24
Decision-making process summary	26
Identified values	28
Proposed guiding principles	30
Detailed subcommittee process.....	31
Detailed consensus building process.....	36
Considered recommendations and voting	36

Executive Summary

The Blue Ribbon Commission on Special Education (Commission) was charged by the Minnesota Legislature to develop an action plan to transform special education services with goals to reduce state special education aid by \$250,000,000 each biennium and to create efficiencies in the statewide special education system, while still maintaining a free and appropriate public education for students with disabilities. If this spending reduction target is not met, the shortfall will be automatically deducted from the special education cross-subsidy aid appropriation.

The Commission members worked collaboratively to reach consensus on their final set of recommendations. The resulting action plan consists of a set of recommendations that would address how to reduce spending and improve efficiency and quality of supports for students with disabilities in the biennium, as well as long-term recommendations that would address the statewide system improvements needed in education that could potentially reduce cost growth over time.

Recommendation regarding the overall charge:

1. Do not enact the reductions to state special education aid recommended below and repeal the contingent reduction in special education cross-subsidy aid in Laws of Minnesota 2025, 1st Spec. Sess. chapter 10, article 7, section 8.

Recommendations to achieve the spending reduction goal:

2. Eliminate the Hold Harmless provision in the state special education funding formula.
3. Shift Alternative Delivery of Specialized Instructional Services (ADSIS) funding to a capped per-student allocation model outside of the special education funding formula.
4. Eliminate the Special Education Charter Tuition Aid.
5. Convert non-special education transportation currently in the funding formula into a separate capped funding stream with prorated reimbursement.

Recommendations to improve special education efficiency, access, and quality:

6. Support the Minnesota Professional Educator Licensing and Standards Board (PELSB) licensure recommendations.
7. Review and evaluate expert recommendations for simplifying special education paperwork.
8. Increase early identification and specialist involvement to provide early behavioral, literacy, and numeracy interventions.
9. Increase support for Full-Service Community Schools.

Recommendations for long-term system change:

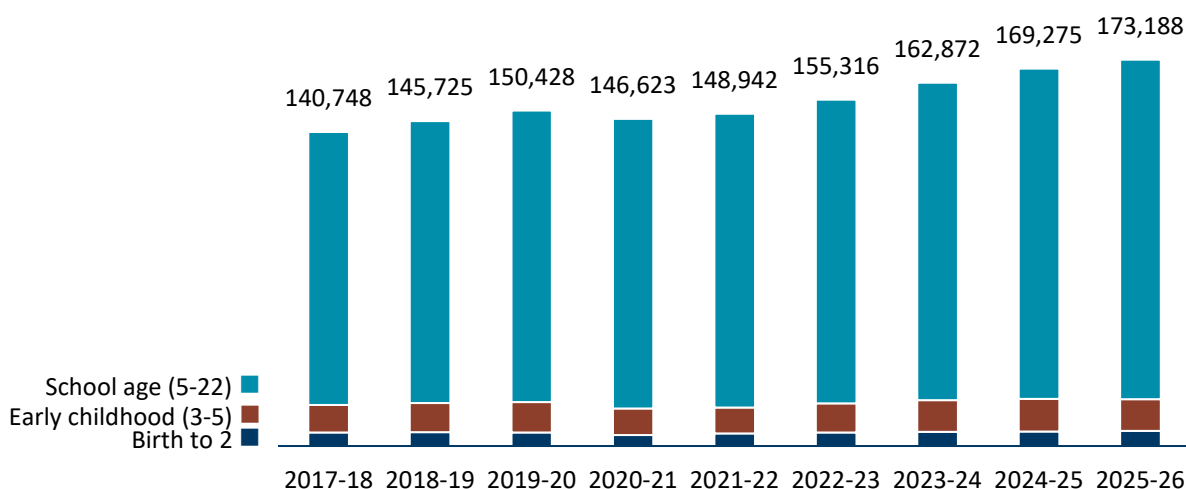
- Minimize barriers and incentivize schools to maximize third-party reimbursement for special education and behavioral health services.
- Continue sustained investment, outside of special education funding, in Multi-Tiered Systems of Support (MTSS) and other evidence-based and data-driven practices.
- Expand Grow Your Own funding to direct-service providers, including special education teachers, related service providers, and paraprofessionals.
- Analyze and discuss complaints, mediation, and other dispute resolution processes and their outcomes.

The primary recommendation for the overall charge is to repeal the spending cuts, because the Commission is concerned about the impact this level of rapid cost reduction will have on students with disabilities, their families, and the schools that serve them. If the Legislature determines that the special education aid reductions need to occur, the Commission members feel confident the set of recommendations proposed is the optimal way to minimize harms.

Background

According to data provided by the Minnesota Department of Education (MDE), the number of students enrolled in special education has steadily increased over time (Figure 1). This increase is primarily among school-age students (age 5 through 22), while early childhood special education enrollment has remained relatively stable over time.

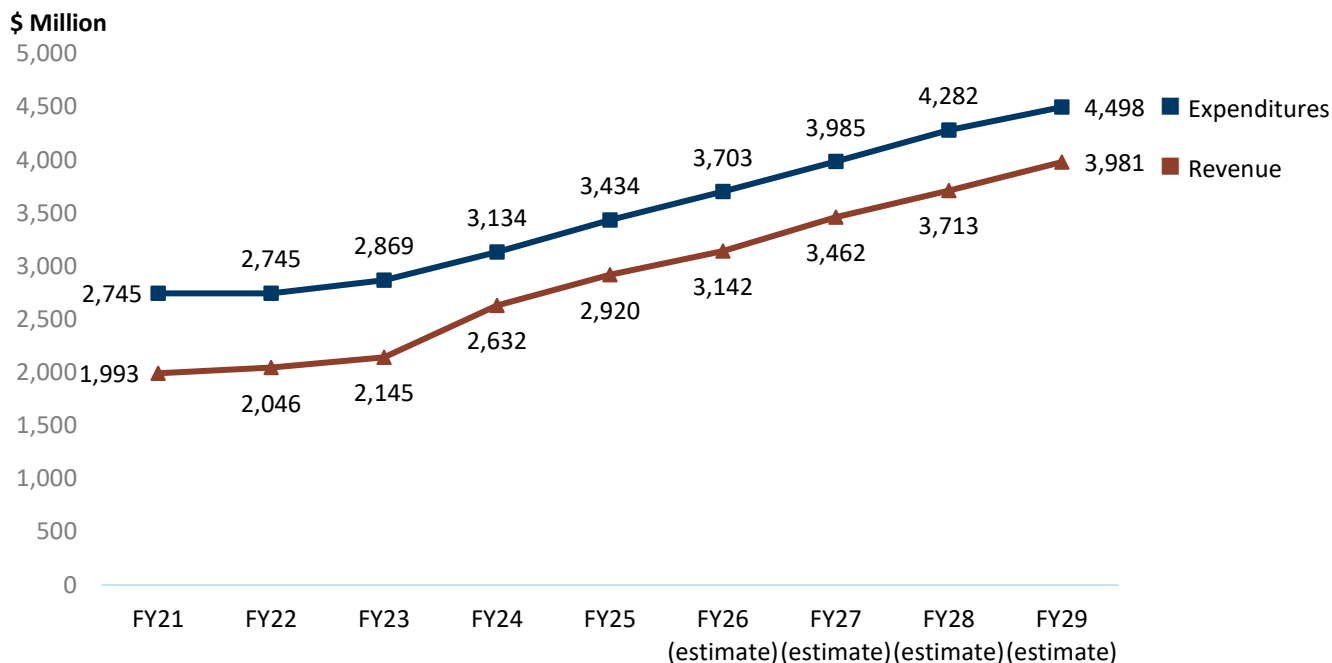
Figure 1. Minnesota special education enrollment, students age birth through 22 years



Note. December 1 child count data for the 2017-18 through 2025-26 school years.

In conjunction with increasing enrollment, special education spending has also increased over time, including outpacing special education revenue from state and federal sources (Figure 2). In fiscal year (FY) 2017, approximately \$2.2 billion was spent on special education, including both state and federal funds, and this is projected to continue to increase to \$4.5 billion by FY29. The gap between special education expenses and revenue is commonly referred to as the “special education cross-subsidy” (see the Appendix for a full glossary of terms). Due to past legislative efforts, the cross-subsidy has decreased in recent years; however, it is still expected to be about \$517 million by FY29.

Figure 2. Special education expenditures and revenues



Note. Includes general education revenue attributable to special education students for time spent receiving special education services outside the regular classroom for more than 60% of the school day.

Special education funding is complex, and it is beyond the scope of this report to provide detailed information about the state special education funding formula, what it contains, and how it is structured. This report refers to portions of the funding formula, as relevant to the Commission’s recommendations. See the [Special Education Funding Guide](#) for more information about special education funding and the funding formula.

Introduction to the charge

In 2025, the Minnesota Legislature charged the commissioner of the Minnesota Department of Education (MDE) with convening a Blue Ribbon Commission on Special Education to advise and assist the legislature and governor in transforming special education services ([Laws of Minnesota 2025, 1st Spec. Sess. chapter 10, article 7, subdivision 7](#)). The purpose of the Commission is to develop and present to the legislature and the governor an action plan for transforming special education services to reduce spending, while maintaining a free and appropriate public education for students with disabilities. The target for the spending reduction is \$250 million

per biennium beginning July 1, 2027, and for each biennium thereafter. If this target is not met, the shortfall will be automatically deducted from the special education cross-subsidy aid appropriation.

In addition, the legislation identified the following specific goals for the Commission's recommendations:

- **Goal 1:** Develop strategies to increase administrative efficiencies and improve program collaboration to promote shared services, including a multi-tiered system of supports (MTSS) to reduce overreliance on special education; provide supports and early intervention programs to reduce the need for more intensive special education services later; use assistive technology; and expand access to teletherapy and remote evaluations to address provider shortages.
- **Goal 2:** Create approaches to reducing special education expenditures, including identifying strategies for addressing the significant cost drivers of state spending on special education, such as special education transportation, tuition billing, specialized placements, legal and administrative costs, and personnel costs.
- **Goal 3:** Design opportunities for reducing paperwork, using data to drive individualized education programs, increasing access to qualified personnel, and eliminating gaps in early identification and early intervention.
- **Goal 4:** Identify opportunities to reform special education funding formulas to incentivize efficient, inclusive practices; increase flexibility in how special education funds are used; align third-party billing practices to maximize reimbursements; and streamline reporting burdens that add value.
- **Goal 5:** Examine statewide strategies for slowing cost growth in special education services while maintaining a free and appropriate public education (FAPE).

Members of the commission and MDE staff noted concerns that implementing the default reductions to special education cross-subsidy aid could potentially conflict with federal Maintenance of Financial Support (MFS) requirements. Under MFS, states must maintain a minimum level of special education spending that does not fall below the prior year's expenditures, with certain exceptions allowed. Minnesota Management and Budget (MMB) has clarified that even with a \$125 million per year reduction in special education cross-subsidy aid, overall state special education spending is projected to grow and exceed prior-year levels. As a result, the state is expected to meet MFS requirements for the upcoming biennium. However, the legislature should exercise caution when considering ongoing reductions to special education aid beyond the 2028-29 biennium to avoid risking noncompliance with federal MFS requirements.

Commission consensus informed decision-making

Wilder Research partnered with the Commission to create a process and tools to support the Commission in achieving its charge. The overall process involved four main components: establishing guiding principles, providing background education on special education finance, forming recommendations in subcommittees, and finalizing recommendations as a full group. This work took place from October 2025 through September 2026. A brief description of each step can be found in the Appendix.

The Commission reached consensus around the following specific aspects of this charge as members developed, prioritized, and refined recommendations:

- There are opportunities to simplify and improve special education funding and programming to limit continued growth in the future.
- Meeting the goal of reducing spending by \$250M per biennium is important to avoid the default reductions in the special education cross-subsidy aid.
- Any cuts to special education spending can be harmful to students and schools, so the options selected must minimize harm.
- Cuts to state special education spending could cause the state to fail federal requirements for Maintenance of Financial Support and lead to further federal reductions to special education revenue, thus creating an even larger funding gap.
- Removing non-special education items from the funding formula would simplify the formula and ensure that special education aid expenditures are isolated to actual special education expenditures.
- However, completely removing expenses without a plan for partially reallocating funds would risk eliminating the service or support.

In addition, the Commission identified the following principles that guided all decision-making for the recommendations presented in this report (see Appendix for more detail):

- **Guiding principle 1:** Cost-reduction strategies will preserve each student's right to a Free Appropriate Public Education (FAPE) and ensure compliance with state and federal special education laws.
- **Guiding principle 2:** Decisions will be student-centered, ensuring that the needs, experiences, and outcomes of students are the primary focus of the Commission's work.
- **Guiding principle 3:** Actions or solutions will be rooted in creativity, innovation, and sustainability.
- **Guiding principle 4:** Strategies will center empathy, transparency, equity, and anti-racist approaches to ensure fairness, consistency, and integrity in the supports.

Recommendations

Recommendation regarding the overall charge

Recommendation 1: Do not enact the recommended reductions to state special education aid and repeal the contingent reduction in special education cross-subsidy aid.

The Blue Ribbon Commission members unanimously recommend that the legislature re-evaluate the spending reductions under this charge. Although the Commission is presenting recommendations in this report for achieving the state special education aid reductions, the full Commission agrees that these reductions, whether through the recommendations provided or through the default cuts to the cross-subsidy, will harm students, schools, and communities. Members of the Commission strongly recommend that these spending cuts not be enacted, or at least significantly reduced, to minimize the harm caused to vulnerable students, families, schools, and communities. The recommendations included in this report that focus on improving efficiency, access, and quality of special education, as well as simplifying the funding formula, will still be beneficial without the harmful spending cuts associated with the overall charge.

Recommendations to achieve the spending reduction goal

The Commissioner proposes the following recommendations to address the spending reduction target in the Commission's charge (Goals 2, 4, and 5). These recommendations are intended to avoid the default cross-subsidy aid cuts, though they each carry important caveats and considerations that must be weighed in final decision-making.

Recommendation 2: Eliminate the Hold Harmless provision in special education funding

Recommendation detail: The Commission recommends ending the remaining Hold Harmless provision for the schools subject to it beginning in the 2028-29 biennium. This would involve putting all districts on the same funding formula, rather than applying the current Hold Harmless calculations for specific districts.

Estimated spending reduction over biennium: \$10,256,278

Rationale and considerations: The Hold Harmless portion of the special education funding formula was designed to support districts in transitioning to a new funding formula, which occurred in 2016. It was initially built to ensure that no district would receive less aid under the new formula rolled out in 2016 than they would have under the old formula. However, a decade later, many school districts remain on the Hold Harmless provision in the state special education aid formula. The minimum aid and inflation adjustments for Hold Harmless have been lowered over time to reduce reliance on this provision. The Commission discussed the option of sunseting Hold Harmless over an additional period. This option was not feasible because it would limit the immediate impact on special education spending reductions needed, both for the Hold Harmless provision itself and for other recommendations that would be offset for any schools still accessing Hold Harmless.

Recommendation 3: Shift Alternative Delivery of Specialized Instructional Services (ADSIS) funding to a per-student allocation model outside of the special education funding formula

Recommendation detail: The Commission recommends that ADSIS be removed from the state special education funding formula and moved to its own standalone formula. Within this standalone formula, the Commission suggests that funds be distributed to all districts and charter schools based on a percentage of their average daily membership (ADM). The total allocation to each district or charter would be calculated by taking 10% of their adjusted ADM and then multiplying by \$500. Allocations would be set within a range from a minimum of \$20,000 and a maximum of \$500,000.

Estimated spending reduction over biennium: \$130,526,396

Rationale and considerations: The consensus among Commission members is that the ADSIS program has value to students and schools, but the current benefits and reach of the program are limited because not all local educational agencies (LEAs) participate and the impact of spending per LEA varies considerably. In addition, the program's position within the special education funding formula complicates the formula and makes it difficult to easily differentiate between the growth of this program and the growth in spending on core special education services and supports. This recommendation would allow LEAs currently receiving ADSIS funding to preserve some of their existing support, and LEAs not receiving ADSIS funding to access the ADSIS support, increasing the

potential benefits of the program across Minnesota. It should be noted that if the spending reduction target decreases, the range of funds allocated could be scaled accordingly.

Recommendation 4: Eliminate the Special Education Charter Tuition Aid

Recommendation detail: The Commission recommends that the state remove the 6% aid for unreimbursed tuition costs currently provided through the Special Education Charter Tuition Aid. This would move charter schools to the same tuition reimbursement amount for open-enrolled students that school districts currently receive.

Estimated spending reduction over biennium: \$15,061,025

Rationale and considerations: Currently, most charter schools receive state special education aid in the same manner as a district, and in addition, they can bill the resident school district for 80% of unreimbursed special education costs not covered by the regular formula. This supplemental aid for charter schools was first created in FY20, when the tuition adjustment for open enrollment decreased from 90% to 85%. The result of this additional aid is that charter schools have lower rates of unreimbursed costs compared to districts. In addition, charter schools have historically had higher special education spending than other LEAs (e.g., in FY 2024, districts billed an average of \$4,872 per full-time student per year for special education, and charter schools billed an average of \$7,861 per full-time student per year). This recommendation is intended to create more consistency between charter schools and districts and further incentivize special education cost containment within charter schools.

Recommendation 5: Convert non-special education transportation currently in the funding formula into a separate capped funding stream with prorated reimbursement

Recommendation detail: The Commission recommends that non-special education transportation costs (Finance Code [FIN] 728) move to a separate, standalone budget outside of the special education funding formula. Under this standalone budget, FIN 728 costs would be reduced to a 60% reimbursement rate and capped at \$60 million. If reimbursements exceed the cap, they would be prorated to maintain the cap. In addition, MDE would support LEAs to review and ensure contracted costs for transportation across funding streams (e.g., special education, general education, and FIN 728) are comparable and not inflated.

Estimated spending reduction over biennium: \$99,438,083

Rationale and considerations: Currently, the special education funding formula includes two types of transportation costs, those associated with a student's IEP (FIN 723) and other non-special education specialized transportation (FIN 728). FIN 728 reimburses LEAs for transporting students who are homeless, attend care and treatment programs, or have a Section 504 Accommodation Plan where special transportation is included as an accommodation. The inclusion of both FIN 723 and FIN 728 in the special education funding formula creates unnecessary complexity in the formula. Moving FIN 728 would simplify the formula and isolate special education expenditures to the special education aid program.

In addition, overall transportation costs have increased notably in recent years due to many factors, including greater reliance on contracted transportation services; increased costs for vehicles, maintenance, and fuel; and increased salaries and benefits for drivers. Although FIN 728 costs are lower than FIN 723 costs (e.g., in FY25, FIN 728 accounted for about 20% of the total transportation funding in the funding formula), reducing FIN 728 costs would not violate federal requirements for maintenance of financial support in the same way cuts to FIN 723 could.

It should be noted that this recommendation was particularly difficult for Commission members to make. One member described this decision as a forced choice between supporting students with disabilities and supporting students experiencing homelessness, and neither option is aligned with the guiding principles of the Commission or the values of access and inclusion for our state's educational system. Although this recommendation is being made to achieve the spending reduction target of this Commission's charge and avoid the default reductions to special education cross-subsidy aid, the Commission strongly encourages legislators to not enact this recommendation unless it is determined to be absolutely necessary to do so.

Recommendations to improve special education efficiency, access, and quality

The following recommendations focus on efficiencies and improvements in special education staffing, access, and quality, as described in the goals of the charge. While they do not directly contribute to the expense reduction target, they are likely to lead to longer-term spending stability and possible reductions if implemented.

Recommendation 6: Support the Minnesota Professional Educator Licensing and Standards Board (PELSB) licensure recommendations

Recommendation detail: The legislature should support PELSB's efforts by adopting the PELSB Legislative Committee's recommendations to improve special education teacher and service provider recruitment, update requirements, and reduce barriers to licensure of qualified instructors.

Rationale and considerations: PELSB is an active, engaged leader in Minnesota's efforts to support educator recruitment, training, and licensing. This organization has invested significant effort into considering, gathering input on, and forming recommendations for reducing barriers and improving recruitment for special education teachers and related service providers. Adopting their policy recommendations help to address staffing shortages and reduce costly turnover. This recommendation aligns with Goals 1, 2, and 3 of the Commission's charge.

Recommendation 7: Review and evaluate expert recommendations for simplifying special education paperwork

Recommendation detail: The Commission recommends that the legislature review and evaluate recommendations already submitted to them by prior work groups and task forces that are focused on simplifying and reducing special education paperwork, including IEPs.

Rationale and considerations: Commission members are aware that the burden of paperwork takes time away from student instruction and engagement, and it can lead to burnout and attrition among staff. However, members also recognize that some documentation, such as student-centered IEPs, is essential for high-quality special education services and preservation of student and family civil rights.

The Commission also recognizes that there have been significant past efforts by multiple work groups and task forces – such as Education Minnesota, Office of the Legislative Auditor, Minnesota Association of School Administrators, and Minnesota Administrators of Special Education – to identify and recommend efficiencies for simplifying IEPs and other required paperwork for special education providers. Despite these multiple iterations of legislative recommendations around this goal, few changes have been adopted.

The Commission suggests that the legislature compiles, reviews, and evaluates these existing recommendations for action, rather than convening another group to replicate this work. This recommendation aligns with Goals 3 and 4 of the Commission’s charge.

Recommendation 8: Increase early identification and supports

Recommendation detail: Commission members suggest that the state and LEAs work to increase early identification and specialist involvement to provide early behavioral, literacy, and numeracy interventions. This includes maintaining early childhood special education identification and support and expanding screening for families not being reached through current systems.

Rationale and considerations: Commission members acknowledge that many LEAs already work hard to identify students needing additional supports, including special education, early in their education. However, there are some populations that are harder to identify than others, including those not already connected to the LEA, social services, or health care systems. The Commission recommends that both LEAs and MDE work collaboratively to reduce barriers to early identification and intervention. These proactive steps to engage students earlier in their learning development will likely result in fewer or more streamlined services and supports needed later in their education. This recommendation aligns with Goals 1 and 3 of the charge.

Recommendation 9: Increase support for Full-Service Community Schools

Recommendation detail: Increase use of Full-Service Community School and Education Partnership grants.

Rationale and considerations: Full-Service Community Schools are a nationally recognized, research-based, transformational model that can improve holistic, wrap-around support for all students and their families. Community schools serve as hubs that connect academic achievement with other needed health and social services to reduce non-academic barriers to learning (e.g., hunger, access to stable housing, access to health care for routine checkups). A synthesis across 143 national studies found improved academic outcomes, attendance, and graduation rates, with a return of up to \$15 in social value for every dollar invested into Community Schools (Maier et al., 2017).

Likewise, the Education Partnerships Coalition in Minnesota uses grants to support a network of evidence-based support services to achievement zones, promise neighborhoods, and cradle-to-career programming, all designed

to close opportunity gaps and improve educational and developmental outcomes for children and families. Continuing and increasing funding for these wrap-around schooling models may require an additional upfront cost, but evidence suggests that those costs are likely to be offset, both within special education and across the state as a whole (e.g., through reduced spending on health, human services, public safety, corrections, and housing over time), saving the state money long term and expanding workforce development opportunities that contribute to the state's promising economic future. This recommendation aligns with Goal 1 of the legislative charge.

Longer-term system change recommendations to improve special education quality and sustainability

In addition to the recommendations that can be implemented within the next biennium, the Commission also identified the following recommendations that align with the goals of the charge related to improving the sustainability and quality of special education services and supports in Minnesota.

- The Minnesota Departments of Education and Human Services should work with LEAs, charter schools, and cooperatives to identify barriers to Medicaid reimbursement (including barriers introduced in new state and federal Medicaid policies) and provide support to **minimize barriers and incentivize schools to use third-party reimbursement**. This support may include training LEA staff, creating tools to simplify processes, offering guidance on law changes, and clarifying the potential financial benefits of accessing third-party reimbursement. The Commission identified this as an important approach for increasing revenue for special education services and supports, though members recognized that some barriers, such as administrative staff capacity and changing laws, make this recommendation more difficult to implement immediately.
- The Legislature and executive branch should continue **sustained investment, outside of special education funding, in Multi-Tiered Systems of Support (MTSS) and other evidence-based and data-driven practices**. MTSS provides schools with a structured pathway to identify struggling students as soon as possible in their schooling and match them to appropriate intervention strategies prior to further escalation. MTSS is also the framework through which the interventions are advanced, wherein the student, once evaluated for special education, then receives interventions in more restrictive settings as needed. When MTSS has adequate staffing and support in schools, students are more likely to be placed in the least restrictive environments, ensuring higher levels of integration between general and special education services, which ultimately saves schools money.
- **Expand Grow Your Own (GYO) funding to direct service providers, including special education teachers, related service providers (such as speech language pathologists and occupational therapists), and paraprofessionals**. Minnesota's GYO program has helped create pathways into classroom teaching for paraprofessionals. The state does fund a Special Education Teacher pipeline grant aimed at increasing licensed teachers; however, the broader ecosystem of service providers and specialists who face similar workforce shortages does not have a comparable pipeline of financial or administrative support. Expanding GYO eligibility to these roles would provide support to address shortages in the positions most necessary to uphold the MTSS model and deliver individualized education and integrated in-classroom support, which benefits special education overall and ensures FAPE is upheld.
- The Commission recognizes that financial and administrative costs associated with dispute resolution are impactful to schools' general and special education budgets. Therefore, members recommend that a committee made up of directors of special education, special education teachers, and MDE dispute

resolution staff collaborate to analyze and discuss complaints, mediation, and other dispute resolution processes and their outcomes. The goal of this group would be to identify opportunities to address disputes more proactively to reduce the need for formal conflict resolution and to make conflict resolution processes more productive, effective, and efficient when they are needed. If disputes could be handled more proactively and productively, it would save LEAs legal and administrative costs and increase collaboration and trust with families.

Conclusions

The Minnesota Blue Ribbon Commission on Special Education acknowledges the growth in state special education expenditures and its impacts on the state budget. However, it primarily suggests not implementing the spending reduction recommendations in this report and revisiting the original charge to repeal the contingent reduction in special education cross-subsidy aid due to the direct and harmful impacts these cuts would have on the state's students with disabilities, their families, and the schools that serve them. The Commission does not believe there is a way to make these levels of cuts while still upholding all four of the agreed-upon guiding principles shaping the Commission's work, foremost, upholding FAPE for all students. The type of spending cuts being demanded will prevent LEAs from being able to readily provide adequate and appropriate options to meet all the required components of individualized education plans.

Should the Legislature and governor determine there is an absolute need to move forward with the charge, the recommendations presented align with the Commission's approach to reduce the amount of overall harm on students and families, including by avoiding the penalty of special education cross-subsidy reductions.

The recommendations related to simplifying the funding formula, improving efficiencies, access, and quality, and implementing long-term system change should move forward. The Commission believes that these actions will improve special education services and supports and potentially improve teacher and provider entry and attrition in the workforce. For these reasons, the Commission believes that these recommendations will ultimately reduce costs and cost growth over time in special education.

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Appendix

Letters from Commission Members

Blue Ribbon Commission members could choose to submit a letter to accompany this report to express their specific perspectives on the recommendations being made. All letters submitted are attached here.

Sept. 11, 2026

Monica Byron
President

Marty Fridgen
Vice President

Ryan Fioreck
Secretary-Treasurer

Carrie Lucking
Executive Director

In 2023, the members of Education Minnesota and I enthusiastically supported the landmark decision of Governor Walz and the state legislature to provide historic state investment to improve special education services statewide and to help lower the deficit commonly referred to as the "cross-subsidy." The funding did not cover the entirety of the gaps left by the unfulfilled promises of the federal government, but it was a significant step toward helping local education agencies achieve more financial stability. In that moment, the Minnesota students in special education, as well as the families who love them and the educators who support them, for once felt seen and respected. It was the closest Minnesota has come to true inclusion for students with disabilities in some time.

It didn't last. The 2025 legislative session ended with the last-minute creation of a Blue Ribbon Commission on Special Education, or BRC, tasked with reducing state special education funding by \$250 million or risk the loss of the landmark cross-subsidy aid passed two years before. The legislature and Governor have a constitutional responsibility to pass a balanced budget each biennium, and this is never an easy task. Our leaders faced even more difficult decisions in 2025 due to a hostile federal government which complicated the budget realities of our state. I understand those tensions, but I do not support the decisions to balance the budget by clawing back resources from students in special education.

I am a member of the Blue Ribbon Commission, and I have the privilege of representing the 86,000 members, both licensed and unlicensed, of Education Minnesota. It is unconscionable to me, and to the members I serve, that my commission was asked to draft proposals to slash special education budgets. The legislation that authorized our commission attempted to obscure our charge with an infusion of related tasks such as "streamlining the formula" and "considering paperwork reductions," both laudable tasks that were given very little attention. Our focus was clear from the start. We were to recommend deep cuts to special education. The rest was gloss.

Ours was both a missed opportunity and a fraught task. It was painful to watch Minnesota's elected leaders yet again bargain away vital resources for the education of students with disabilities. The symbolic pain inflicted with this decision should not be understated, nor will it be easily forgotten by members of the disability justice community.

Minnesota was once a national leader in the education of students with disabilities, and we should all be proud of our past. In 1950, Governor Luther Youngdahl was part of early efforts to increase public mental health services for at-risk children and children with disabilities. In a 1950 speech to one of the first national conventions on educating students with disabilities, which was held in Minneapolis, Youngdahl told attendees that Minnesota leaders had a target cost in mind when they set out to improve educational services, but their work forced them to examine the conscience of Minnesota's citizens and leaders. Youngdahl told those attendees that through that hard work, Minnesota "came out of the legislative session with almost double appropriations for our appropriations."

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**THE VOICE FOR PROFESSIONAL
EDUCATORS AND STUDENTS**

Minnesota continued to be a leader in the space of education for children with disabilities later that decade. In 1957, Governor Orville Freeman created an interim commission on the education of students with disabilities. This group of commissioners drafted a set of legislative recommendations that overwhelmingly passed the legislature later that year. Minnesotans should be proud that these efforts, and the pioneering work that started under Youngdahl, were some of the first reforms in the country. These leaders set Minnesota as a national example as the federal government struggled through the debates that eventually led to the passage of the federal *Individuals with Disabilities Education Act* of 1975, a foundational moment for disability justice in the United States.

As a member of the BRC, I sit and wonder how the leaders from the Youngdahl and Freeman eras would evaluate our work and decisions in the year 2026. My fellow BRC members and I were, in many ways, asked to do the exact opposite of those leaders who came before us. I wonder how those pioneers would feel that our BRC had to debate and consider unconscionable choices such as cutting funding to services that help housing-insecure students in order to preserve some funding for special education programs. I doubt they would feel we carried the torch to protect the services they fought to create.

So, our report offers the best options for cutting special education spending by \$250 million, but I urge the legislature and the new governor to ignore them. Instead, go back and reconsider the decision made in 2025 to make SpEd cuts so deep that harm is inevitable for students, families, communities, and educators.

I ask the future legislature that will be seated in 2027 to have a thoughtful conversation about our shared past as a state and our contemporary values as a community of citizens. In 2026, Representatives Ben Bakeberg and Kim Hicks led a bipartisan coalition to stop these proposed cuts to special education. Senators Jim Abeler, John Hoffman, and Bonnie Westlin led a similar charge in the state Senate. Their efforts were met with nearly unanimous support in both chambers. I ask our new leaders to consider this reality before they put ink on any decision that cuts funds. Our new leaders can build on the common ground that was already present at the end of the 2026 legislative session and find an alternative to provide true stability for special education programs.

It was an honor to be named to this commission by Governor Tim Walz, and it is more than a privilege to represent that tremendous members of Education Minnesota and the students they serve. I hope our work at the BRC will spark a needed conversation on how to preserve and improve the systems needed to provide quality education to all students regardless of their ZIP code, faith, disability status, race, sexual orientation, or gender identity. Let us all build a future that prioritizes disability justice.

With hope,



Justin L. Killian, PhD
Education Issues Specialist
Education Minnesota
Appointed Member of the MN Blue Ribbon Commission on Special Education

¹Deno, E. D., & Hale, N. A. (2017). *Dogged Determination: An Anthology of the 1957 Law Requiring Education for Handicapped Children in Minnesota's Public Schools-A First in the Nation*. (G. Bratvold, Ed.) Minneapolis: University of Minnesota

This is an additional response to the Governor's Blue Ribbon Commission on Special Education.

One part of the commission's charge is to increase the efficiency of paperwork, with the results being a reduction in special education costs. There are other underlying factors which influence the costs of special education services in the state of Minnesota.

- 1) The federal government has never fulfilled its promise to fund special education. Currently the state of Minnesota receives an average around 8% and not the promised 42%. The state of Minnesota is not receiving the pledged federal funding.
- 2) The federal eligibility criteria is more restrictive than the criteria used in Minnesota. Minnesota over-identifies students with disabilities, thus we are serving more students than federally required.
- 3) The Federal Form, that is the Individual Education Plan (IEP) paperwork is two pages. Minnesota's IEP paperwork is significantly longer, and has additional required pages.
- 4) Federally required Comprehensive three-year Evaluation Reports, are not as detailed and extensive as compared to what the state of Minnesota requires.
- 5) Individual School Districts are allowed to add additional sections, parts, and requirements to IEPs and Comprehensive three-year Evaluation Reports. These additional sections, parts, and requirements, are typically the response to litigation.
- 6) Limiting the number of students a Special Education teacher is responsible to case-manage, and how special education minutes are calculated and re-imbursed.
- 7) The nationwide shortage of Special Education teachers, is also the situation in Minnesota. This shortage is not due to a lack of people holding a Special Education teaching license. Special Education teachers have two jobs: teaching, and completing due process paperwork within timelines. Failure to provide Special Education Teachers with time during their regular contract day to complete required due process paperwork, necessitates that Special Education Teachers, work after hours on weekdays, or weekends to complete due process paperwork. This contributes to teacher burn-out and mistakes in due process paperwork, which potentially exposes districts to litigation.

None of the above can be addressed by a Governor's Blue Ribbon Commission. These potential cost saving items can only be addressed by changes in legislation. Changes to the above seven items are beyond the scope and power of this Blue Ribbon Commission.

If the above items are to be addressed, modified or legislated, it is absolutely necessary that all of the impacted stakeholders (students' advocacy groups, parent advocacy groups, disability advocacy groups, School Administrators, Special Education Administrators, Education Minnesota, and Minnesota's Department of Education all be included in these discussions. Individual groups have tried to introduce and pass legislation only to be opposed by other stake holder groups.

Thank you, for your consideration and efforts to improve service delivery to Minnesota's students,

Ramona Springis-Doss

Member of the Governor's Blue Ribbon Commission on Special Education



Independent School District 625

360 Colborne Street
Saint Paul, MN 55102-3299

Office of the Superintendent

Stacie Stanley, Ed.D.
Superintendent of Schools

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September 10, 2026

Dear Governor Walz, Education Finance Chair Kresha, and Education Finance Chair Youakim:

On behalf of the Saint Paul Public Schools Board of Education, I write to strongly urge the Legislature to repeal the \$250 million special education spending reduction mandated for the biennium beginning July 1, 2027, and adopt the Blue Ribbon Commission on Special Education's Recommendation 1 in full.

As Superintendent of Saint Paul Public Schools — Minnesota's second-largest district, serving nearly 33,000 students across 69 schools — I have had the privilege of serving on the Blue Ribbon Commission alongside colleagues from across the state. It is crucial to note that the Commission's recommendation to repeal or significantly reduce these cuts was unanimous. That consensus reflects something that must be critically noted — Commission members with vastly different vantage points — district and charter leaders, Education Minnesota representation, disability advocates, legislators, and educators — arrived independently at the same conclusion: This level of rapid cost reduction will harm the students who can least afford to be harmed.

The Commission's report is careful to note that its own recommendations for achieving the spending target, while offered in good faith, "carry important caveats and considerations that must be weighed." For SPPS, those caveats are not abstract. Two recommendations alone would cost our district over \$9 million annually beginning in FY2029 and every year thereafter:

- **\$7.9 million reduction in McKinney-Vento transportation funding** (FIN 728), which the Commission's own report acknowledges reimburses districts for transporting students experiencing homelessness, students in care and treatment programs, and students with Section 504 transportation accommodations. One Commission member described this specific tradeoff as "a forced choice between supporting students with disabilities and supporting students experiencing homelessness" — a choice that should never be asked of any school system.
- **\$1.5 million reduction in ADSIS funding**, a program the Commission itself affirms "has value to students and schools." ADSIS is not a peripheral program in Saint Paul — it is part of how we identify and intervene early with students who need additional support before their needs escalate into more intensive, more costly special education services.

These are not the only reductions that would reach our students, but they illustrate a pattern: The programs on the list are not underperforming or unnecessary. They are working, and in the case of McKinney-Vento Homelessness, they are federally required. The Commission's report affirms this in the very recommendations that would reduce their funding.

Saint Paul Public Schools is in the midst of a sustained, community-focused effort to raise literacy outcomes for our most vulnerable students — many of whom are the same students these funding streams exist to serve. Stable transportation is not a peripheral support for an unhoused student; it is the precondition for that student showing up to the classroom where the crucial literacy instruction is provided. Early intervention through ADSIS is not a nice-to-have; it is often the difference between a student who catches up and a student who falls significantly behind. Cutting these supports does not reduce the need — it defers it, often impacting economic mobility and possible involvement with the criminal justice system.

We ask the Legislature to:

1. Repeal the \$250 million special education spending reduction target, consistent with the Blue Ribbon Commission's unanimous Recommendation 1.
2. Should reductions still occur, ensure any resulting plan protects transportation funding for students experiencing homelessness and preserves ADSIS as an early-intervention resource — recognizing, as the Commission itself does, that both programs deliver real value that this proposal would otherwise sacrifice for a budget target.

The Blue Ribbon Commission did the hard work the Legislature asked of it, and did so thoughtfully and collaboratively. Its key message deserves to be heard as clearly as it was delivered: These cuts will harm students, and the Legislature should not require them.

Thank you for your consideration and your continued partnership with Minnesota's public schools.

Sincerely,

A handwritten signature in black ink, appearing to read "Dr. Stacie Stanley". The signature is fluid and cursive, with the first name "Stacie" being more prominent.

Dr. Stacie Stanley
Superintendent
On behalf of the Saint Paul Public Schools Board of Education

Tables

A1. Minnesota special education enrollment, students age birth through 22 years

Year	Birth to 2	Early childhood (3-5)	School age (5-22)	Total
2017-18	6,025	12,400	122,323	140,748
2018-19	6,151	13,077	126,497	145,725
2019-20	6,128	13,547	130,753	150,428
2020-21	4,890	11,921	129,812	146,623
2021-22	5,596	11,627	131,719	148,942
2022-23	6,105	13,089	136,122	155,316
2023-24	6,410	14,154	142,308	162,872
2024-25	6,549	14,527	148,199	169,275
2025-26	6,726	14,335	152,127	173,188

A2. Special education expenditures and revenues

Year	Expenditures (\$ in millions)	Revenue (\$ in millions)
FY21	2,745	1,993
FY22	2,745	2,046
FY23	2,869	2,145
FY24	3,134	2,632
FY25	3,434	2,920
FY26 (estimate)	3,703	3,142
FY27 (estimate)	3,985	3,462
FY28 (estimate)	4,282	3,713
FY29 (estimate)	4,498	3,981

Glossary

Alternative Delivery of Specialized Instructional Services (ADSIS)

A Minnesota program and funding mechanism allowing districts to use approved alternative service-delivery models (often early intervention and prevention approaches) for students, funded through a capped special education expenditure model rather than per-pupil reimbursement in the ordinary formula. Historically capped at \$500,000 per LEA before the FY16 formula change, now governed by an expenditure cap tied to maintenance of effort limits (Minnesota Department of Education, 2016; Minn. Stat. 125A.78 [2025]).

Average Daily Membership (ADM)

A count of students enrolled in a district (calculated by MDE using average membership over the school year), used as a base figure across several Minnesota education funding formulas — including, in special education finance, as an input to per-pupil comparisons like cross-subsidy per ADM figures reported in MDE’s legislative cross-subsidy reports. Listed in MDE’s acronym guide (Minnesota Department of Education, n.d.-d).

Census-Based Funding

One of several formula types blended into Minnesota’s state special education aid calculation — funding based on a fixed rate tied to overall enrollment or population rather than actual per-pupil service costs, used alongside percentage reimbursement and student-weighted components (Minnesota Department of Education, n.d.-b).

Cooperative / Education District / Intermediate District

Multi-district entities Minnesota LEAs use to jointly deliver or fund special education services; each has different rules for whether it can directly receive federal IDEA funds (Minnesota Department of Education, n.d.-b; see LEA definition below).

Coordinated Early Intervening Services (CEIS)

Federally allowed use of a portion of IDEA funds for early intervening services to non-identified students, intended to reduce inappropriate referrals to special education. Listed in MDE’s acronym guide (Minnesota Department of Education, n.d.-d).

Cross-Subsidy

The gap between what a district spends on special education and the revenue (state, federal, and local) it receives specifically for special education. Districts cover the shortfall with general education revenue (Minnesota Department of Education, 2010, 2021).

Cross-Subsidy Aid

A state aid formula targeting extra aid to districts. This specific state aid component, begun in state fiscal year 2020, was designed to reduce the amount of districts cost that were pushed back on their general fund. Defined and calculated under Minn. Stat. 125A.79 [2025].

Free Appropriate Public Education (FAPE)

The federal IDEA (Individuals with Disabilities Education Act) requirement that eligible students with disabilities receive special education and related services, at no cost to families, designed to meet their individual needs as documented in an IEP. MDE's funding guide uses this as a formal acronym (Minnesota Department of Education, n.d.-d).

Hold Harmless

A protection built into the state special education aid formula ensuring a district's aid doesn't drop below a specified floor even when the standard formula would otherwise reduce it. The current hold harmless component and its calculation are defined in Minn. Stat. 125A.76 [2025].

Individualized Education Program (IEP)

The legally required, individualized plan documenting a student's disability-related services, goals, and placement; the vehicle through which FAPE is delivered.

Individuals with Disabilities Education Act (IDEA)

The federal law establishing FAPE, IEPs, and the Part B (school-age) and Part C (early intervention, birth–2) funding streams that flow through MDE to LEAs.

Local Educational Agency (LEA)

In Minnesota's special education funding guidance, LEA is defined broadly to mean any school district, charter school, cooperative, education district, or intermediate district. Cooperatives and education districts may act as fiscal hosts and receive federal IDEA Part B and Part C funds on behalf of member districts; intermediate districts do not receive federal funds on behalf of members (Minnesota Department of Education, n.d.-b).

Maintenance of Financial Support (MFS)

A federal IDEA requirement that a state (and, in certain circumstances, an LEA) not reduce its special education spending below a prior-year baseline, as a condition of continuing federal funding. If the state does not maintain its MFS, then the funding will be reduced to match the decreased spending for the current fiscal year and future fiscal years. Minnesota's forecast-based MFS mechanism is addressed in Minn. Stat. 125A.76, subd. 8 [2025] (Minnesota Department of Education, 2016).

McKinney-Vento (Homeless Assistance Act)

A federal law (not an MDE special education finance term, but it frequently intersects with special education work) guaranteeing students experiencing homelessness the right to enroll, attend, and receive services — including special education without delay — regardless of housing status, and to stay in their school of origin when in their best interest (National Association for the Education of Homeless Children and Youth, 2025). Minnesota districts and charter schools must designate a District Homeless Liaison; MDE administers a related supplemental subgrant (FIN 868) to eligible LEAs based on identified homeless student counts, and all LEAs must comply with McKinney-Vento whether or not they receive subgrant funds (Minnesota Department of Education, n.d.-e).

Non-Special Education Transportation

Unlike standard special education busing tied directly to an Individual Education Program (IEP) — which usually falls under FIN 723 — FIN 728 pays for unique student populations who need specialized transit or accommodations (Minnesota Department of Education, n.d.-c). Eligible groups include:

- Students experiencing homelessness (needing transport to their school of origin).
- Students attending care and treatment programs.
- Students with a Section 504 Accommodation Plan that requires specialized transport.
- Students temporarily placed in a shelter care facility.
- Selected foster care transportation needs.

Tuition Adjustment / Tuition Billing

An adjustment (positive or negative) in the state aid formula for students with IEPs served outside their district of residence, and the associated billing process between resident and serving districts. Governed by Minn. Stat. 125A.11 and 127A.47 [2025], as referenced in the MDE funding guide (Minnesota Department of Education, n.d.-c).

Decision-making process summary

Guiding principles

One of the first tasks Commission members completed was to identify and reach consensus on the guiding principles that must be reflected in all recommendations. This task helped to ensure that recommendations were rooted in the values and priorities of Commission members and gave members a chance to connect around these common values. The practice started by members using an anonymous online tool to list their top three values. The overall, unduplicated list of values was then shared with members, and they were asked to rank the values from most to least important. Members were then asked to draft principle statements that encompassed the values. Finally, members voted on the proposed principle statements using a fist-to-five rating, with a fist (zero fingers) representing complete disagreement with a statement and a five representing complete agreement.

From this process, the Commission selected a final prioritized list of guiding principles:

- **Guiding principle 1:** Cost-reduction strategies will preserve each student’s right to a Free Appropriate Public Education (FAPE) and ensure compliance with state and federal special education laws.
- **Guiding principle 2:** Decisions will be student-centered, ensuring that the needs, experiences, and outcomes of students are the primary focus of the Commission’s work.
- **Guiding principle 3:** Actions or solutions will be rooted in creativity, innovation, and sustainability.
- **Guiding principle 4:** Strategies will center empathy, transparency, equity, and anti-racist approaches to ensure fairness, consistency, and integrity in the supports provided to all students across Minnesota (rural, urban, and suburban) who are evaluated and determined eligible for special education.

Background education on special education finance

To ensure all Commission members had access to the same background information to inform their planning, MDE hosted a series of informational sessions for Commission members. These involved experts from MDE presenting on specific topics, including:

- Special education finance 101
- Trends in special education spending
- ADSIS program and funding
- Understanding fiscal notes
- Entitlements versus reimbursements

In addition, MDE staff invited Commission members to submit questions ahead of meetings and raise questions during meetings, and staff presented responses to the full group both verbally and in writing.

Subcommittee process

Once the baseline special education finance information and guiding principles were established, the Commission broke into subcommittees to work on brainstorming and prioritizing recommendations. There were five subcommittees, each with three to four members, who were tasked with collaboratively addressing two of the goal areas identified in the legislation. Each subcommittee was asked to meet independently between January and May 2026 to work through the following process:

- **Step 1 - Open brainstorming:** Think of as many ideas as possible without constraints.
- **Step 2 - Narrowing ideas:** Sort and prioritize ideas that are likely to reduce special education spending.
- **Step 3 - Prioritizing ideas:** Rate each idea based on its alignment with the guiding principles and relevant goal area.
- **Step 4 - Refining recommendations:** Choose the top recommendations to move forward to full group.
- **Step 5 - Presenting recommendations:** Each subcommittee presented their top recommendations to the full Commission.

Consensus-building approach

After each subcommittee presented their recommendations, Wilder Research compiled, deduplicated, and refined the list of recommendations for Commission members to vote on. The Commission completed multiple

rounds of review and refinement of the recommendations, including: electronic voting; elimination voting; providing feedback on language and implementation considerations for recommendations; and proposing approaches for grouping recommendations. The final set of recommendations was voted on at the Commission's final in-person meeting.

Identified values

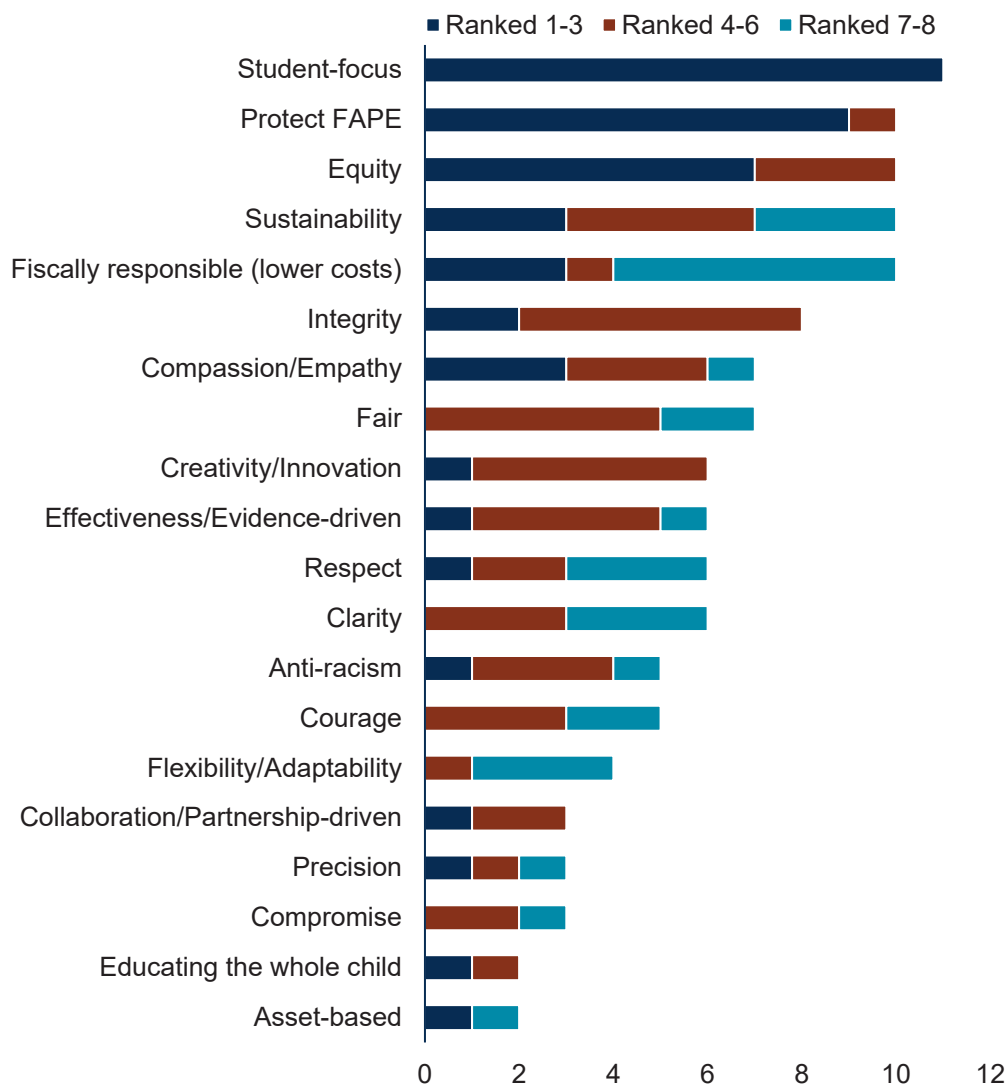
A screenshot of the values members identified live can be found here:

A3. Screenshot of values word cloud



And their rating of these values included the following (1=most important; N=11):

A4. Ratings of values by members



Proposed guiding principles

During the exercise of developing and prioritizing guiding principles, the Commission considered the following statements:

- All cost-reduction strategies **must preserve each student's right to a Free Appropriate Public Education (FAPE)** and ensure compliance with state and federal special education laws.
- All decisions will be **student-centered**, ensuring that the needs, experiences, and outcomes of students remain the primary focus of the Commission's work.
- The Commission will **center empathy, transparency, equity, and anti-racist approaches** to ensure **fairness, consistency, and integrity** in the supports provided to all students across Minnesota (rural, urban, and suburban) who are evaluated and determined eligible for special education.
- We commit to implementing **creative, innovative, and sustainable** solutions ensuring that actions taken will enable students with disabilities to thrive and be the best that they can be.
- This commission will ensure that the **financial responsibility** of providing services to persons receiving special education services will not be shifted from state and local education authorities to families and direct service providers.
- Recommendations generated will be based on sound **research, evidence-based practices**, relevant data, and guidance from experts in the field.
- Recommendations should **simplify administrative burdens** to maximize the time special education staff spend directly serving students and aim to streamline and simplify funding formulas.
- Cost-management strategies must **prioritize system improvements** that enhance effectiveness, efficiency, and long-term sustainability, such as strengthening inclusive practices, leveraging general education supports, improving service coordination, and reducing duplication of efforts.

Subcommittee process guide

Blue Ribbon Commission on Special Education

Updated 03/05/2026 (updated text is underlined and in green)

Process overview: Each subcommittee is tasked with developing a list of recommendations that address their assigned goal areas all with the ultimate aim to reduce special education spending in Minnesota. To do this, groups will follow the steps described below using the provided tools. Subcommittees may choose how to structure these activities (e.g., balancing individual thinking and group discussion; completing steps across shorter, more frequent meetings or fewer, longer meetings), but it is essential that each subcommittee engages all members in these steps and reaches consensus throughout the process.

Available tools: We have two options for materials you can use for this process:

- **Option 1:** a set of fillable or paper worksheets you can use to guide you through steps 1 and 2.
- **Option 2:** a set of electronic tools (a Miro board and a Google sheet) that you can use for all steps.

Documentation requirements: Please note, we will ask you to share your worksheets or materials with Wilder Research to help us document the process for our final report. If you choose to use the electronic tools, Wilder will have access to your documentation through the tools, so you will not need to submit anything separately.

Questions and technical assistance: MDE staff are available to help you answer questions or to support your work throughout the subcommittee process. At each stage of the process, please send your questions or technical assistance requests to Fatima promptly to ensure that they can be answered in a timely manner to avoid slowing down your work.

Step 1: Open Brainstorming – What are your ideas?

During this stage of the process, we would like all Commission members to think of as many ideas as possible to address the goals assigned to their group.

- **Think broadly:** We want you to think expansively without limiting yourself in any way. At this part of the process, you do not need to be constrained by feasibility or consequences of your ideas, we just want to harvest as many ideas as possible.
- **Independent brainstorming:** It may be helpful to allow for individual, independent brainstorming before coming back together to discuss the ideas that emerged.
- **Organize by goal area:** Please use the space labeled for each of your group's goal areas to roughly organize your ideas and ensure that you are considering both goals you were

assigned. If an idea cuts across goal areas, then please make a note of that and place it under the area for which it most closely aligns.

- **Capture questions and TA needs:** Also, during this time, please make note of additional questions or technical assistance requests that are arising for you as you are thinking of ideas.

Step 2: Narrowing Ideas – Will it reduce spending?

During this stage, you will preliminarily sort your ideas based on the likelihood that they will achieve our primary charge of reducing special education spending. You do not need to estimate the magnitude of the impact on spending, only whether or not the idea is likely to result in a reduction overall. Updated 03/05/2026: Ideas can be included if they are likely to lead to a short-term reduction in special education spending (i.e., within the next biennium) or a longer-term reduction in special education spending. We will ultimately want to ensure that the Commission moves forward with at least some short-term recommendations, though the Commission may also choose to make longer-term recommendations.

- You can categorize your ideas into 3 groups:
 - **Likely impact:** Ideas that are likely to reduce special education spending
 - **Unlikely impact:** Ideas that are not likely to reduce special education spending
 - **Unclear impact:** Ideas that need more information to determine if they are likely to reduce special education spending
- You will want to discuss the ideas thoroughly enough that you are able to reach a consensus on which category best fits the idea.
- For any questions in the “unclear” category, please plan to ask questions or request technical assistance from MDE in order to gain a better understanding of whether or not the idea is likely to lead to a reduction in spending. Our goal is to have very few (if any) ideas in this category at the end of this step.
- Ideas will still be sorted by goal area to ensure that each goal is addressed.

Step 3: Prioritizing Ideas – Do they align with guiding principles?

At this stage, you will do a more comprehensive rating of your narrowed list of ideas to better understand how they align with the Commission’s agreed-upon guiding principles. Your goal is to reach consensus on each criterion for each idea as a group.

- **Use your Step 2 list:** Take the ideas that you identified *as likely to reduce special education spending* and plug them into the first column of the Task 3 Table. This will be the list of ideas that you rate during the prioritization process. Set aside ideas that are “unlikely” or “unclear” in their impact at this stage.
- **Rate each idea:** You will work together to collectively rate each of the ideas on the following criteria:

- **Alignment with guiding principle 1:** Cost-reduction strategies will preserve each student's right to a **Free Appropriate Public Education (FAPE)** and ensure compliance with state and federal special education laws.
- **Alignment with guiding principle 2:** Decisions will be **student-centered**, ensuring that the needs, experiences, and outcomes of students are the primary focus of the Commission's work.
- **Alignment with guiding principle 3:** Actions or solutions will be rooted in **creativity, innovation, and sustainability**.
- **Alignment with goal area:** You will also rate each of the ideas based on how closely it aligns with the relevant goal area
 - Using a scale of 1-5, with 1 = Does not align or contradicts the guiding principle/goal area and 5 = Fully aligns with the guiding principle/goal area
- **Estimated impact on spending:** You will also collectively rate how much you believe each idea will reduce special education spending
 - Using a scale of 1-3, with 1 = Small reduction in special education spending and 3 = Large reduction in special education spending
- **Compare ideas:** Please rate the ideas relative to each other to ensure some variation in ratings. The goal of this step is to help prioritize the ideas, so having little variation in your ratings will make the prioritization more difficult.
- **Document rationale:** You may choose to use the far right column to document reasons for your ratings.

Step 4: Refining Recommendations – Which ideas will move forward to the full Commission?

Updated 03/05/2026: Based on the ratings you did in Step 3, you will need to select your top 2 short-term recommendations for each goal area to move forward to the full Commission. You may also identify 1-2 longer-term recommendations to bring to the full Commission.

- **Identify top ideas:** You may have a clear list of the top 2 short-term ideas from each goal area based on the ratings, or you may have to refine your top ideas even further to decide your top 2. Updated 03/05/2026: You can also choose to select 1-2 ideas that may not lead to short-term reduction in spending, but are likely to lead to a longer-term spending reduction. If you have additional recommendations you would like the full Commission to consider, please document them for the time being.
 - If you need to refine your top ideas even further, we recommend holding a vote for the ideas that each member would like to move forward. You may choose to use the “fist-to-five” approach for this voting (see image below).
- **Make it clear and actionable:** At this stage, you can also determine the language that best captures your idea to make it as clear and actionable as possible. Remember that the members of the full Commission may not be as familiar with your idea as your team is, so provide enough information to help them understand what you are specifically suggesting.



No way!
I'll block this.



I see MAJOR
issues we need
to resolve.



I see MINOR
issues we need
to resolve now.



I see minor
issues we can
resolve later.



I'm fine with
this as it is.



I love this!
I will champion it.

Lack of Consensus

Consensus

Step 5: Presenting Recommendations to Full Commission

Updated 03/05/2026: The final stage of your subcommittee work is to present your top 2 prioritized short-term recommendations for each goal area (and up to 2 longer-term recommendations) to the full Commission.

- You will use the PowerPoint slide template to document and present your recommendations.
- Each recommendation should include the following information:
 - The recommended action
 - 1-3 sentences or bullet points describing your rationale for the recommended action
 - 1-2 anticipated benefits of the recommended action
- You will need to submit a draft of your slides to Fatima **by May 22, 2026**.
- A member of your subcommittee should be prepared to present these slides at the full Commission meeting on June 4, 2026. Your whole subcommittee should be prepared to answer questions about your recommendations, as needed.

Detailed consensus building process

After compiling, grouping, and deduplicating the recommendations from the subcommittees, Wilder Research then sent an online survey to Commission members that asked them to rate each recommendation and comment on those for which they had questions or concerns. Wilder compiled these responses and sent them to members to review ahead of our next meeting.

At the next meeting, members reviewed each other's feedback, discussed their questions, received estimated financial impacts of recommendations (as relevant), and engaged in an elimination vote to remove recommendations for which there was a serious concern or not enough support.

From the refined list, members engaged in a collaborative feedback process using an online Miro board to document their proposed language revisions and considerations for the remaining recommendations, as well as their proposals for how to group the recommendations. Wilder used this feedback to identify areas of consensus and areas for additional discussion. Some new recommendations emerged, and some recommendations required additional language modifications to improve their clarity and meaning. Proposed revisions to language were also sent to members through an electronic form to review and refine ahead of our final meeting.

The final Commission meeting involved reviewing the areas of consensus, discussing the remaining questions, and voting on the refined recommendations.

Considered recommendations and voting

This summary includes the ratings 15 Blue Ribbon Commission members submitted on the subcommittee recommendations.

Ratings could be:

Green - I fully support this idea

Yellow - I may support this idea with more information or minor revisions

Red - I have significant concerns about this idea

Average ratings were calculated based on a scale of Green=3, Yellow=2, and Red=1. Higher average ratings reflect greater support for the recommendation.

Members who rated each recommendation as yellow or red were asked to provide comments, questions, and concerns about the recommendation. These informed recommendation refinement but are not included in this report.

Transportation Costs and FIN 728

	Green	Yellow	Red	Avg Rating
Remove non-special education transportation costs from the special education funding formula	13	1	1	2.80
Establish FIN 728 as a separate capped funding stream with reduced reimbursement rates, prorated reimbursements, clearer statewide eligibility criteria, and/or increased MDE audit oversight	11	3	1	2.67
Reduce FIN 723 reimbursement from 90% to 85% to encourage transportation cost control	7	7	1	2.40
Require transportation decisions for FIN 728 to be IEP-team driven and based on educational need rather than parent preference or medical need	7	6	2	2.33
Reduce FIN 728 aid rate to match state cross-subsidy percentage of 50%	7	6	2	2.33
Incentivize in-house transportation services and reduce reliance on contracted transportation providers	4	9	2	2.13

ADSIS

	Green	Yellow	Red	Avg Rating
Remove ADSIS from the special education funding formula and cross-subsidy eligibility	11	4	0	2.73
Shift ADSIS funding to an ADM/per-student allocation model with minimum and maximum allocation	9	5	1	2.53
Cap ADSIS appropriation with prorated reimbursements if expenditures exceed the cap	8	5	2	2.40

Hold Harmless and Charter Tuition

	Green	Yellow	Red	Avg Rating
Eliminate general education billing through tuition cross-subsidy	10	4	1	2.60
Eliminate charter tuition cross-subsidy aid and unreimbursed charter tuition aid from the special education formula	9	4	2	2.47
Eliminate the Hold Harmless provision in the special education funding formula	9	3	3	2.40
Sunset Hold Harmless provision after four consecutive years of decreased investment	7	6	2	2.33

IEP and Paperwork Simplification

	Green	Yellow	Red	Avg Rating
Maintain concise historical summaries within evaluations and PLAAFPs and only update new information	9	5	1	2.53
Maintain one unified student support record or plan that follows students as supports increase	9	5	1	2.53
Simplify IEPs, goals, and objectives, including using clearer, more universal language with dropdowns and checklists to reduce repetitive documentation	8	6	1	2.47
Create a statewide IEP system that includes Minnesota state standards, state and federal compliance supports, and AI-assisted functionality	8	4	3	2.33
Reduce progress reporting frequency to twice per year	8	3	4	2.27

Teacher Preparation, Licensure, and Workforce Development

	Green	Yellow	Red	Avg Rating
Strengthen teacher preparation programs by including special education foundations and disability categories, Universal Design for Learning (UDL), behavior management strategies, and/or Science of Reading instruction	14	1	0	2.93
Continue and expand alternative licensure programs and portfolio licensure pathways, such as Teacher Mentoring Grants, Teacher Pathway Grants, Grow Your Own programs, And Special Education Pipeline/Pathway initiatives	13	2	0	2.87
Reduce licensure barriers for out-of-state teachers and teachers working outside their licensed field	11	3	1	2.67

LEA and Interagency Collaboration

	Green	Yellow	Red	Avg Rating
Expand collaboration among LEAs to share resources and personnel, reduce contracted service costs, improve fiscal flexibility, and support staff recruitment and retention	13	2	0	2.87
Expand partnerships among community organizations, including health providers, counties and cities, public health agencies, and community organizations and clinics to provide wrap-around services	12	2	1	2.73
Increase use of Full-Service Community School and Education Partnership grants	10	2	3	2.47

Process Improvements

	Green	Yellow	Red	Avg Rating
Increase early identification and specialist involvement to provide early behavioral, literacy, and numeracy interventions	11	4	0	2.73
Expand virtual and hybrid evaluations	10	2	3	2.47
Redesign staff roles and responsibilities for efficiency, including promoting collaboration between therapists and special education staff	8	5	2	2.40

Long-Term Recommendations

	Green	Yellow	Red	Avg Rating
Increase reimbursement capture of Medicaid funds (including addressing new barriers to accessing Medicaid funds)	14	1	0	2.93
Review and reduce legal and administrative costs	14	1	0	2.93
Modify PT, OT, and Speech licensure requirements for school-based practice while maintaining MA eligibility	12	3	0	2.80
Review FAPE for non-public schools	13	1	1	2.80
Review Charter Tuition Billing rates	13	1	1	2.80
Review state licensure requirements	13	1	1	2.80
Increase availability of COTAs, SLPAs, and PTAs	12	2	1	2.73
Remove cross-subsidy aid on the general education portion of the tuition bills	12	2	1	2.73
Improve data transparency	12	2	1	2.73
Continue investment in MTSS, PBIS, and evidence-based and data-driven practices	10	5	0	2.67

	Green	Yellow	Red	Avg Rating
Review additional rules that exceed federal law	12	1	2	2.67
Reevaluate entrance criteria	11	2	2	2.60
Expand Grow Your Own funding to include school bus drivers	7	7	1	2.40
Create statewide eligibility criteria and rules	7	7	1	2.40
Address educator healthcare affordability	9	2	4	2.33