



## EL 2.4 Treatment of Staff

### Policy Quadrant: Executive Limitations

- Monitoring Time Frame: ~~July 2023–June 2024~~ July 2024–June 2025
- Date of School Board Monitoring: ~~October 28, 2024~~ October 27, 2025

### Board Policy Monitoring Motions:

- Operational Interpretation is/is not reasonable
- Board does/does not accept the Superintendent's assertion of compliance/non-compliance

### Global Constraint:

**The Superintendent shall not cause or allow a work environment that is unsafe, unwelcoming, inequitable, disrespectful, unclear or that otherwise inhibits effective staff performance.**

### OPERATIONAL INTERPRETATION:

I interpret the Board's global policy to mean that the district must provide a work environment where employees are safe, treated with dignity, given clear expectations, and supported in ways that allow them to perform their jobs effectively. A work environment fails this expectation when it is unsafe (not protecting staff from known hazards), unwelcoming (perceived as hostile or unreceptive), inequitable



(not fair or just), disrespectful (discourteous or rude), or unclear (lacking direction and expectations). Any of these conditions would inhibit staff performance and would be out of compliance with the global policy.

Because the global policy is broad, the Board has clarified its intent through the associated child policies. I therefore interpret compliance with the global as being demonstrated through full compliance with all child policies.

### Examples of Operationalization:

1. **Clarity of Roles and Policies:** All staff work under written job descriptions, accessible and clearly written personnel policies, and formal evaluation policies that guide performance expectations (2.4.1–2.4.3).
2. **Safety and Preparedness:** Staff are provided training, protocols, and resources to ensure preparedness in emergencies, and workplaces are free from recognized hazards (2.4.4).
3. **Ethical and Respectful Conduct:** Policies and procedures are in place to prevent conflicts of interest and to safeguard fair, respectful, and equitable treatment of all employees (2.4.5).
- ~~1. An unsafe work environment is one that does not protect employees from known dangers.~~
- ~~2. An unwelcoming work environment is one in that employees perceive as hostile or unreceptive.~~
- ~~3. An inequitable work environment can be described as one that District fails to treat employees in a manner that is considered fair and just.~~
- ~~4. A disrespectful environment is one that is discourteous and rude.~~

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### JUSTIFICATION:

- ~~1. School district employees are provided a place of employment and conditions of employment free from recognized hazards that are likely to cause death or serious injury or harm. (Minnesota Statute section 182.653, Subdivision 2; Policy 407)~~
  - ~~a. The District maintains a “Non-contract Grievance” procedure for all staff based on Regulation 401.IIR~~
- ~~2. Staff are made to feel welcome in the following ways:~~
  - ~~a. Honoring and complying with the Minnesota Veterans Preference Act (Policy 405)~~



- ~~b. The District seeks to maintain a learning and working environment that is free from harassment and violence on the basis of race, color, creed, religion, national origin, sex, age, marital status, familial status, status with regard to public assistance, sexual orientation, or disability (Policy 413; Minnesota Statute section 121A.03)~~
- ~~c. District policy states that employees must report behavior that is in violation of policy.~~
- ~~3. Staff are provided equity by the District in the following ways:~~
  - ~~a. The school district is an equal employment opportunity employer (Policy 401)~~
  - ~~b. Providing a fair employment setting for all persons and to comply with state and federal law (Policy 402)~~
  - ~~c. Providing progressive discipline through due process (Collective Bargaining Agreements, At-Will Work Agreements, as outlined in the Supervisor Manual).~~
- ~~4. Staff are respected through the following means:~~
  - ~~a. Protection of Public and Private Personnel Data (Policy 406)~~
  - ~~b. Submission of a good faith mandated report under Minnesota law and this policy will not adversely affect the reporter's employment (Policy 414 & 415).~~

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## MEASUREMENT PLAN:

Compliance with this policy will be demonstrated when:

- 1. ~~Compliance with all~~ Child policies 2.4.1 through 2.4.5 are in compliance. ~~of the policy.~~

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## EVIDENCE:

- 1. ~~All~~ Child policies 2.4.2 through 2.4.5 are ~~were deemed~~ in compliance.

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## STATEMENT OF ASSERTION:

EL 2.4 is reasonable and in compliance.



BOARD NOTES:

### 2.4.1

Furthermore, the Superintendent shall not: Allow staff to work without a written job description.

#### OPERATIONAL INTERPRETATION:

I interpret “staff” to mean all individuals employed by the district, including licensed, non-licensed, administrative, and supervisory personnel, whether full-time or part-time. I interpret a “job description” to mean a written document maintained by the district that specifies the position title, purpose, primary stakeholders or customers, position qualifications, and essential responsibilities. Every staff position type has such a written job description to ensure role clarity and alignment with organizational expectations.

~~Every staff position type is defined in writing to include title, purpose, primary customers, position qualifications and essential responsibilities.~~

#### JUSTIFICATION:

~~Job descriptions in the district include title, purpose, primary customers, position qualifications, and essential responsibilities/functions.~~

#### MEASUREMENT PLAN:

Compliance with this policy will be demonstrated when:

1. Job descriptions are reviewed on a periodic basis, and reviewed at the posting of a vacancy.



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**EVIDENCE:**

1. 100% of staff positions have a job description. 100% of jobs posted include the minimum requirements and qualifications for the position.
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**STATEMENT OF ASSERTION:**

EL 2.4.1 is reasonable and in compliance.

BOARD NOTES:

**2.4.2**

**Furthermore, the Superintendent shall not: Operate without accessible, clearly-written personnel policies.**

**OPERATIONAL INTERPRETATION:**

I interpret “accessible, clearly-written personnel policies” to mean that district policies governing employment are:

- Written in clear language so they can be readily understood by employees.
- Easily available to both employees and supervisors in multiple formats.
- A vital communication tool that set forth:
  - District expectations for employee conduct and performance,
  - The rights of employees, and
  - The district’s legal obligations as an employer.



I further interpret compliance to mean that when a report or complaint regarding a policy violation is received, the district has a process in place to investigate, resolve, and, if necessary, take corrective action consistent with board policy, law, and contractual obligations.

~~Clearly written and accessible personnel policies are:~~

- ~~1. Written in such a way to be understood by employees~~
- ~~2. Easily obtained by the employee and employer~~
- ~~3. A vital communication tool between the District and its employees, and contain the following:~~
  - ~~a. District employee expectations, and;~~
  - ~~b. Employee rights,~~
  - ~~c. The legal obligations as an employer~~
- ~~4. When a report or complaint regarding a violation of a policy is reported, a process is in place to investigate and resolve the report or complaint.~~

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### JUSTIFICATION:

Eden Prairie Schools is a member of the Minnesota School Boards Association. One of the benefits of membership is access to model policies, including those related to personnel. The model policies are written and vetted by prominent Minnesota law firms. Each policy is reviewed and updated at least every three years or at such time as the prevailing state or federal law or rule is changed. Upon notice of a policy update, the District begins a process of updating.

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### MEASUREMENT PLAN:

Compliance with this policy will be demonstrated when:

1. Employees have multi-modal access and exposure to district personnel policies and workplace rules as outlined in the operational interpretation above..
2. All open reports or complaints regarding violations of district personnel policy are tracked, investigated, and resolved in a timely manner.



3. In the event that a report or complaint identifies a substantiated violation, the district takes appropriate action consistent with law, board policy, and contractual agreements. Compliance is therefore demonstrated not only by the absence of unresolved reports but also by the district's timely and appropriate response to issues when they arise.
  - ~~4. Multi-modal access and exposure to rules of the workplace as demonstrated in the Operational Interpretation above; and~~
  - ~~5. Percentage or number of reports or complaints that are outstanding or not resolved regarding violation of district policy during the reporting period.~~
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### EVIDENCE:

1. Multi-modal access has been provided and expectations have been met including:
    - a. 100% of district policies were posted online and annual review process of policy updates based on MSBA model policy was completed during the monitoring period.
    - b. All employees hired to the district received:
      - i. A new hire orientation which includes training on district policies & procedures.
      - ii. 100% of staff sign off on acknowledgement of district policies and procedures.
    - c. Collective bargaining agreements and employee contracts are available on the district's EpNet or in the district's human resources office.
    - d. All of the required federal and state mandatory posting notices are posted in each building in a common area (typically a staff lounge) and are updated annually.
  2. There ~~are~~ were zero outstanding or unresolved reports or complaints as of [June 30, 2025](#) ~~June 30, 2024~~.
  3. [There are no outstanding reports for which to report necessary appropriate action.](#)
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### STATEMENT OF ASSERTION:

EL 2.4.2 is reasonable and in compliance.



BOARD NOTES:

## 2.4.3

**Furthermore, the Superintendent shall not: Operate without a reasonable, formal evaluation policy for all staff.**

### OPERATIONAL INTERPRETATION:

I interpret a “reasonable, formal evaluation policy” to mean a district-wide approach that is officially adopted, consistently implemented, and based on clear rules and processes that form judgments using a logical and transparent framework. In practice, this means that all employees are evaluated through systems designed to provide accountability, feedback, and professional growth.

In our context, examples include:

- **Executive Cabinet:** Evaluated by the Superintendent through a process grounded in leadership attributes, mutual goal setting, and ongoing feedback.
- **Cabinet Subordinates:** Evaluated by their supervising Cabinet member using a goal-based process aligned to professional standards.
- **Principals:** Evaluated by the Superintendent or appropriately licensed designee using a performance-based system as required by Minn. Stat. §§123B.143 and 123B.147. These evaluations are designed to strengthen leadership, improve teaching and learning, and support student success.
- **Teachers:** Evaluated through the locally negotiated teacher evaluation and peer review process (Minn. Stat. §§122A.40–122A.41). Where no agreement exists, the state process is followed. Teacher evaluations are designed to develop and support effective teaching practices and improve student learning outcomes.
- **Classified Staff:** Evaluated using a codified district evaluation system aligned with position responsibilities and performance expectations.

~~I interpret a reasonable, formal evaluation policy is one that is officially sanctioned, performed in accordance within the rules set forth, that forms a judgment using a logical process.~~



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## JUSTIFICATION:

1. Board Policy BMD 3.4 sets forth the goals and process used to evaluate the Superintendent.
  2. The Superintendent evaluates and provides direction and feedback to Executive Cabinet personnel on an ongoing and annual basis. Evaluations are based on key attributes of leadership and mutual goal setting.
  3. Executive Cabinet members evaluate their subordinates annually through the use of mutually agreed upon professional goals evaluation process.
  4. The principal accountability laws require a superintendent to use a performance based system to annually evaluate each school principal assigned to supervise a school building within the school district (Minnesota Statute section 123B.143, subdivision 1; section 123B.147, subdivision 3). The evaluation is to improve teaching and learning by enhancing the principal's ability to shape the school's professional environment and support and improve school performance, student achievement, and teacher quality, performance, and effectiveness.
  5. The teacher accountability laws allow a school board and the exclusive representative of the teachers to jointly agree to an annual teacher evaluation and peer review process for probationary and non-probationary teachers
  6. (Minnesota Statute section 122A.40, subdivisions 4, 5, 8, 9; and section 122A.41, subdivisions 2, 3, 5, 6). If there is no agreement, the district must implement the teacher evaluation and peer review process developed by the education commissioner and specified education stakeholders. Annual teacher evaluations are designed to develop, improve, and support qualified teachers and effective teaching practices and improve student learning and success.
  7. Classified Staff are evaluated annually using a codified evaluation system.
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## MEASUREMENT PLAN:

Compliance with this policy will be demonstrated when:

1. The Executive Director of Human Resources reports annually on the status of the employee evaluation system and adherence to the justifications as listed above.
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**EVIDENCE:**

1. 100% of staff is evaluated on an ongoing basis as approved by the Superintendent.

**STATEMENT OF ASSERTION:**

EL 2.4.3 is reasonable and in compliance.

BOARD NOTES:

**2.4.4**

**Furthermore, the Superintendent shall not: Allow staff to be unprepared to deal with emergency situations.**

**OPERATIONAL INTERPRETATION:**

I interpret this policy to mean that the District must ensure all staff are equipped to respond appropriately to emergency situations that may impact the safety of students, employees, or visitors. Emergency preparedness includes clear protocols, role-specific training, regular practice, and access to necessary equipment.

In our operational context, this includes threats or hazards addressed in the District's Crisis Management Plan, as well as building specific emergency procedures aligned to the Minnesota Comprehensive School Safety Guide (published by the Department of Public Safety) and Minnesota Statute 123B.57, which governs health and safety revenue and planning.

Reasonable preparedness includes:

- Conducting all required safety drills at each school site (fire, lockdown, severe weather);
- Maintaining tools and protocols such as Raptor, AEDs, Narcan, and Red Alert/Site Emergency Response Teams (SERT);



- Providing training to staff based on their specific roles (e.g., CPR for health staff, Right-to-Know for custodial staff);
- Collaborating with local first responders and emergency management agencies;
- Conducting internal and third-party reviews (e.g., mock OSHA walkthroughs) to proactively address safety needs.

These practices reflect a reasonable interpretation of preparedness and align with best practices from the Minnesota Department of Education, DHS, OSHA, and school safety guidance at the state and national level.

- ~~1. School emergency planning directs staff and student preparation and response. Knowing how to respond during a crisis helps everyone remain calm, understand their role, and act as safely and efficiently as possible. Emergency planning includes all risks, crises, and emergencies schools may encounter.  
(Source: Keeping Minnesota Ready: Comprehensive School Safety Guide; Homeland Security and Emergency Management)~~
- ~~2. The State of Minnesota and OSHA require that employees understand the potential risks inherent in their particular workplace and that the workplace be safe.~~

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### JUSTIFICATION:

- ~~1. Careful planning, practice, and effective response, saves lives, prevents injuries and minimizes property damage. Exercising, reviewing and revising both school and district emergency plans is crucial to keeping plans current and aligned with best practices.  
(Source: Keeping Minnesota Ready: Comprehensive School Safety Guide; Homeland Security and Emergency Management)  
— a. The District Crisis Plan contains procedures for the various hazards/emergencies.~~
- ~~2. "To qualify for health and safety revenue, a school board must adopt a health and safety policy. This policy must include provisions for implementing a health and safety program that complies with health, safety, and environmental regulations and best practices including indoor air quality management. (Minnesota Statute 123B.57) General areas of emphasis for the district Health and Safety Program include but are not limited to:
  - Asbestos
  - Fire and Life Safety
  - Lightning
  - Structural Safety~~



- ~~Combustible and Hazardous Materials Storage~~
- ~~Indoor Air Quality~~
- ~~Mechanical Ventilation~~
- ~~Mold Cleanup and Abatement~~
- ~~Accident and Injury Reduction Program~~
- ~~Infectious Waste/Blood borne Pathogens~~
- ~~Community Right to Know~~
- ~~Compressed Gas Safety~~
- ~~Confined Space Standard~~
- ~~Electrical Safety~~
- ~~First Aid/CPR/AED~~
- ~~Food Safety Inspection~~
- ~~Forklift Safety~~
- ~~Hazardous Waste~~
- ~~Hearing Conservation~~
- ~~Hoist/Lift/Elevator Safety~~
- ~~Integrated Pest Management~~
- ~~Laboratory Safety Standard/Chemical Hygiene Plan~~
- ~~Lead~~
- ~~Control of Hazardous Energy Sources (Lockout/Tagout)~~
- ~~Mechanical and Power Equipment Safety~~
- ~~Mercury~~
- ~~Personal Protection Equipment (PPE)~~
- ~~Playground Safety~~
- ~~Radon~~
- ~~Respiratory Protection~~
- ~~Underground and Above Ground Storage Tanks~~
- ~~Welding/Cutting/Brazing~~
- ~~Swimming Pool Safety~~
- ~~Ladder/Fall Protection~~



- ~~Bleacher Inspections~~
  - ~~Boiler Inspections~~
  - ~~Crisis Management~~
  - ~~Emergency Response Procedures~~
  - ~~Fire Prevention~~
  - ~~Other areas determined to be appropriate by the Facilities and Safety Department.~~
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## MEASUREMENT PLAN:

Compliance with this policy will be demonstrated when:

1. Each school site conducts and documents the required number of emergency drills, including fire, lockdown, and severe weather drills, in accordance with state law.
2. Emergency response tools (e.g., AEDs, Narcan, universal precaution kits, and Raptor) are maintained and accessible at all buildings.
3. Site-specific emergency response plans are reviewed annually, and building leaders complete an emergency preparedness self-assessment.
4. Staff receive appropriate role-specific training, including but not limited to: CPR/First Aid, Right-to-Know, Bloodborne Pathogens, and emergency communication tools.
5. The District collaborates with local emergency responders in planning and training.
6. The District completes a third-party mock OSHA walkthrough to proactively identify and address safety issues.
7. ~~By June 30 of each year, all Site Leaders or their designees shall complete a Self-Assessment Checklist that reports on the following criterion related to safety preparedness during the preceding school year:~~
  - ~~The Emergency Plan—District Office only~~
  - ~~Policy—District Office only~~
  - ~~Drills~~
  - ~~Building Access~~
  - ~~Keys and Identification~~
  - ~~Visitor Procedures~~
  - ~~Staff Training~~
  - ~~Physical Climate~~
  - ~~Communications~~



- General Exterior
- Buses and Parking
- Playground/Recreation Areas
- Deliveries
- General Interior
- Cafeteria
- Gymnasium Area(s)
- Specialized Areas
- Monitoring and surveillance

8. ~~The Health and Safety Program is monitored using the following: Annual "Mock" OSHA Inspection conducted by an outside entity (Brightworks or Institute for Environmental Assessment) OSHA Inspections this process occurs on a random basis and is generally unannounced.~~
  9. ~~A Safe Learning Plan will be developed and the Incident command team will be used to create a plan, and communicate necessary changes.~~
  10. ~~Right to know training will be provided to inform staff on the risks and proper use of cleaning supplies in their work spaces.~~
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### EVIDENCE:

1. All required emergency drills were completed at each school site during FY 2024-25 and recorded in RAPTOR, including:
  - a) Five (5) fire drills
  - b) Five (5) lockdown drills
  - c) One (1) severe weather shelter drill
2. Emergency response tools were present and operational at each District site:
  - a) AEDs and Narcan available at all sites
  - b) Universal precaution kits stocked in all custodial areas and health offices
  - c) Raptor Emergency Management is active and functional at all sites
3. Site-specific emergency plans were reviewed as part of annual self-assessments by building leaders and reviewed by the Emergency Management Coordinator in August 2024.
4. Staff training included:
  - a) CPR/First Aid certification for health personnel, special education staff, bus drivers, and other key roles.



- b) Right-to-Know and Bloodborne Pathogen training for custodial and maintenance staff, food service workers, and others as required.
  - c) Raptor Emergency Management training for all site administrators and Site Emergency Response Teams (SERT) in August 2024.
  - 5. The District coordinated a full-scale reunification with Fire, Police, and Hennepin County EMS in August 2024.
  - 6. A third-party mock OSHA inspection was conducted by Institute for Environmental Assessment (IEA) on April 2, 2025; findings were reviewed and corrective actions documented.
  - 7. ~~The following information was gathered and reports completed:~~
    - a) ~~Leadership meets at least annually to review and update the District's Crisis Management policy.~~
    - b) ~~All sites conducted five (5) fire drills during the school year (maps posted in all occupied rooms).~~
    - c) ~~All sites conducted five (5) lockdown drills during the school year.~~
    - d) ~~All sites conducted at least one (1) severe weather shelter during the school year (maps posted in all occupied rooms).~~
    - e) ~~All sites had Red Alert/SERT (School Emergency Response Team) to act as first responders to any medical event on site.~~
    - f) ~~CPR/First Aid certification required for specific job titles. Institute for Environmental Assessment identified the following job titles as requiring CPR/First Aid certification: School Nurse, Health Paraprofessionals, Bus Drivers, Special Education Teachers, and Special Education Paraprofessionals.~~
    - g) ~~All sites had at least one (1) fully automated AED (Automated External Defibrillators) and one (1) dose of narecan.~~
    - h) ~~All sites had multiple Universal Precautions Kits for blood borne pathogen cleanup as well as all necessary personal protective equipment. Universal Precaution kits located in all custodial closets and Health Services offices throughout the district.~~
    - i) ~~The district had a reunification plan in the event of off-site evacuation and held a drill on August 9, 2018. The District coordinated a reunification event during the monitoring period. District partners from Eden Prairie Fire, Police, Hennepin County EMS, and site level representatives all collaborated in the design process. The full scale reunification event is scheduled for August 2024.~~
  - 8. ~~Mock OSHA (Occupational Safety and Health Administration) walkthrough: Conducted yearly by Metro ECSU and Facilities and Safety Coordinator, most recently on March 5, 2024.~~
  - 9. ~~A complete Safe Learning Plan was developed and communicated to staff in consultation with the Incident Command Team. The District implemented a Raptor emergency response app in each building and provided training to site leaders on how to use it. Raptor uses the Standard Response Protocol (SRP) language for uniformity of language and response to each unique situation.~~
  - 10. ~~Staff who were using cleaning chemicals were provided "right to know" training during the monitoring period.~~
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**STATEMENT OF ASSERTION:**

EL 2.4.4 is reasonable and in compliance.

BOARD NOTES:

**2.4.5**

**Furthermore, the Superintendent shall not: Operate without policies and procedures which prevent conflict of interest.**

**OPERATIONAL INTERPRETATION:**

I interpret “policies and procedures which prevent conflict of interest” to mean systems that ensure employees do not use their positions for personal gain, do not allow private interests to impair professional judgment, and avoid situations where competing loyalties could reasonably be perceived to interfere with their responsibilities to the district. A conflict of interest occurs when an employee has influence or decision-making authority over diverging interests that are, or could be, at odds with one another.

In the context of public schools, conflict of interest is prevented and addressed through the following frameworks:

- **Code of Ethics for Minnesota Teachers (8700.7500):** Teachers must uphold professional conduct standards, including the prohibition on using professional relationships with students, parents, or colleagues for private advantage.
- **Code of Ethics for School Administrators (3512.5200):** Administrators are prohibited from accepting or offering gifts, gratuities, or favors that impair judgment, and from engaging in dishonesty, fraud, or misrepresentation in the course of professional duties.
- **District Policy 421 – Gifts to Employees:** Provides district-wide guidance to all employees regarding the acceptance of gifts and the avoidance of conflicts of interest.

~~A conflict of interest arises in the workplace when an employee has competing interests or loyalties that either are, or potentially can be, at odds with each other. A conflict of interest causes an employee to experience a struggle between diverging interests, points of view, or~~



~~allegiances. Conflict of interest situations assume that the employee has control or influence over diverging interests, points of view, or allegiances.~~

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## JUSTIFICATION:

### ~~1. Code of Ethics for Minnesota Teachers (8700.7500)~~

~~a. Subpart 1. Scope. Each teacher, upon entering the teaching profession, assumes a number of obligations, one of which is to adhere to a set of principles which defines professional conduct. These principles are reflected in the following code of ethics, which sets forth to the education profession and the public it serves standards of professional conduct and procedures for implementation. This code shall apply to all persons licensed according to rules established by the Professional Educator Licensing and Standards Board.~~

~~b. Subp. 2. Standards of professional conduct.~~

~~E. A teacher shall not use professional relationships with students, parents, and colleagues to private advantage.~~

### ~~2. Code of Ethics for School Administrators (3512.5200)~~

~~a. Subpart 1. Scope. This part applies to all persons licensed as school administrators as defined in part 3512.0100, subparts 5 to 7.~~

~~b. Subp. 2. Standards of professional conduct.~~

~~H. A school administrator shall not accept gratuities, gifts, or favors that impair professional judgment, nor offer any favor, service, or item of value to obtain special advantage.~~

~~K. A school administrator shall not engage in conduct involving dishonesty, fraud, or misrepresentation in the performance of professional duties.~~

### ~~3. District Policy 421 Gifts to Employees provides guidance to employees regarding conflict of interest.~~

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## MEASUREMENT PLAN:

Compliance with this policy will be demonstrated when:

1. **Professional Standards Oversight:** No determinations are issued by the Professional Educator Licensing and Standards Board (PELSB) or the Board of School Administrators substantiating a complaint of conflict of interest against district staff.



2. **District Policy Oversight:** No violations of District Policy 421 (Gifts to Employees) are determined through district investigations or reports.
  3. **Financial Oversight:** The annual external audit, along with periodic internal and external financial controls conducted under Board Policy EL 2.7, does not identify a conflict-of-interest finding.
  4. **Corrective Action:** In the event that a substantiated violation, complaint, or finding occurs, the district responds promptly with corrective actions that are consistent with law, board policy, and contractual obligations. Compliance is therefore demonstrated not only by the absence of violations but also by the presence of appropriate corrective measures when violations do occur.
  5. ~~Determination by the Professional Educator Licensing and Standards Board or the Board of School Administrators that a complaint has been substantiated.~~
  6. ~~Determination that a violation of District Policy 421 Gifts to Employees has not occurred.~~
  7. ~~The Annual Audit and intermittent financial internal and external controls as described in Board Policy EL 2.7 does not contain a "finding".~~
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### EVIDENCE:

1. No determinations have been received from the Professional Educator Licensing and Standards Board or the Board of School Administrators.
  2. There were no reported complaints in reference to Policy 421.
  3. There are no audit findings to report.
  4. **There were no corrective actions necessary.**
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### STATEMENT OF ASSERTION:

EL 2.4.5 is reasonable and in compliance.



BOARD NOTES: