

ST. CROIX PREPARATORY ACADEMY BOARD GOVERNANCE COMMITTEE POLICY REVIEW PROCEDURE

Responsible Committee: Governance Committee

Related Roles: Designated Governance Committee Member or Board Clerk, Executive Committee, Executive Director

Adopted by the Board:

Revised:

Last Reviewed:

A. PURPOSE

The purpose of this procedure is to establish a consistent and transparent process for the review, revision, recommendation, adoption, and maintenance of the St. Croix Preparatory Academy Board of Governance (“Board”) policies of St. Croix Preparatory Academy (“SCPA”).

This procedure is intended to:

- ensure Board policies remain current and aligned with applicable Minnesota law, charter school requirements, and best governance practices;
- establish clear roles and responsibilities for the Governance Committee, Designated Governance Committee Member or Board Clerk, Executive Committee, and administration;
- ensure policies are reviewed on a regular schedule;
- maintain clear documentation and version control of all policy revisions;
- support effective Board governance and institutional continuity.

For purposes of this procedure, “best governance practices” shall be understood by reference to guidance issued by the Minnesota School Boards Association (MSBA), the National School Boards Association (NSBA), and the SCPA’s authorizer. The Governance Committee may also consult other recognized charter governance frameworks as appropriate. Where these sources conflict, MSBA guidance shall be treated as the primary reference given SCPA’s operational context under Minnesota law.

B. AUTHORITY

The Board retains final authority to adopt, amend, suspend, and repeal all Board policies.

The Governance Committee serves in an advisory and drafting capacity and shall make recommendations to the Board for action.

C. RESPONSIBILITIES

i. Governance Committee

The Governance Committee is responsible for:

- maintaining an annual policy review calendar;
- identifying policies requiring review, revision, or development;
- reviewing legal, regulatory, and operational changes affecting policy language;
- discussing and recommending substantive revisions;
- requesting administrative or legal consultation as needed;
- forwarding recommended policies to the Executive Committee and the Board.

Conflict of Interest and Recusal

Any Governance Committee member who has a personal, financial, or professional interest in a policy under review shall disclose that interest to the Committee Chair prior to or at the start of the relevant meeting.

Upon disclosure, the Chair shall determine, in consultation with the disclosing member, whether recusal is appropriate. A member who is recused shall not participate in discussion or vote on the relevant policy item and shall leave the room during deliberation if requested.

Disclosures and recusals shall be noted in the meeting minutes. If the Chair is the member with a potential conflict, the disclosure shall be made to the Executive Committee.

This provision does not replace or supersede any broader conflict of interest policy adopted by the Board.

ii. Governance Committee Chair

The Committee Chair shall:

- establish the committee agenda for policy review;
- coordinate timelines and pre-read expectations;
- facilitate committee discussion and consensus-building;
- communicate recommendations to the Executive Committee.

iii. Designated Governance Committee Member or Board Clerk

A Designated Governance Committee Member or Board Clerk shall serve as the official custodian of Board policy documents and is responsible for:

- maintaining the official policy manual;
- tracking policy review and revision dates;
- incorporating committee-approved edits into draft documents;
- maintaining version control, including redline and clean copies;
- archiving prior policy versions;
- preparing final policy documents for Board packets and posting.

The Designated Governance Committee Member or Board Clerk may make clerical, formatting, citation, and numbering corrections consistent with committee direction but shall not make substantive changes without committee approval.

In the event the Designated Governance Committee Member or Board Clerk is unable to perform assigned duties during an active policy review cycle, the Governance Committee Chair shall designate a temporary custodian from among Board members or

administrative staff to fulfill the Designated Governance Committee Member or Board Clerk's procedural responsibilities on an interim basis.

The designation shall be documented in meeting minutes. The temporary custodian shall have the same authorities and obligations as the Designated Governance Committee Member or Board Clerk for the duration of the interim period. The Executive Committee shall be notified promptly of any vacancy affecting an active review cycle.

iv. Executive Committee

The Executive Committee shall:

- review Governance Committee recommendations prior to placement on the Board agenda;
- ensure alignment with Board priorities and strategic direction;
- identify legal, financial, or governance risks;
- determine readiness for Board action.

v. Administration

The Executive Director and designated administrative staff may provide input related to:

- legal compliance;
- operational implementation;
- alignment with current school procedures;
- recommended revisions based on practice or regulatory changes.

Final policy ownership remains with the Board.

vi. Stakeholder Input

The Governance Committee recognizes that staff, families, and community members may have relevant perspectives on Board policies, particularly those affecting students, families, or school operations.

For policies with significant operational, student, or community impact, the Governance Committee should, where practicable:

- provide an opportunity for written comment from staff or families prior to or during the review process;
- invite the Executive Director to solicit and summarize relevant input from school personnel;
- consider input received when deliberating on policy language.

Input may be submitted to the Designated Governance Committee Member or Board Clerk, who shall forward it to the Governance Committee Chair for distribution to committee members. The solicitation and summary of input received shall be noted in the meeting minutes.

This section does not create a right to participate in committee deliberations or Board action. The Board retains sole authority to adopt, amend, or repeal policies.

D. POLICY REVIEW SCHEDULE

The Governance Committee shall maintain a rolling review schedule to ensure all Board policies are reviewed at least once every three (3) years, unless earlier review is required.

Policies with significant legal or compliance implications should be reviewed annually, including but not limited to:

- data privacy /MGDPA;
- personnel and employment;
- student discipline and safety/crisis response;
- special education and student services;
- Board governance and Open Meeting Law procedures.

The Designated Governance Committee Member or Board Clerk shall maintain and distribute to the Governance Committee Chair, at the start of each governance year, a report identifying: (a) all policies due for review in the current year; (b) any policies whose scheduled review date has passed without documented review; and (c) the date of last review for each policy in the manual.

If any policy has not been reviewed within its required review cycle, the Governance Committee Chair shall place it on the next available committee agenda. Policies that are more than six (6) months overdue for review shall be reported to the full Board with a remediation timeline.

The Governance Committee may, by recorded vote, extend a review deadline for a specific policy by up to one (1) year if extenuating circumstances are documented in meeting minutes.

E. STANDARD POLICY REVIEW PROCESS

i. Identification of Policies for Review

Policies may be identified for review through:

- the annual review calendar;
- statutory or regulatory updates;
- recommendations from MSBA or legal counsel;
- Board or committee request;
- administrative recommendation;
- authorizer requirements;
- audit findings or incident review.

ii. Initiation of New Policies

A new Board policy may be initiated by:

- the Governance Committee;
- a recommendation from the Executive Committee or Board;
- a request from the Executive Director based on operational need, legal requirement, or authorizer guidance;
- an audit finding or incident review identifying a gap in existing policy coverage.

New policy development shall follow the same review, drafting, Executive Committee review, and Board adoption process as policy revisions set forth in this procedure. The Governance Committee Chair shall assign drafting responsibility and establish a target timeline at the time of initiation.

The Designated Governance Committee Member or Board Clerk shall assign a policy number and create a version history record upon first committee approval of a draft, treating the initial adoption date as the first review date for calendar purposes.

iii. MSBA Model Policy Monitoring

The Designated Governance Committee Member or Board Clerk, in coordination with the Governance Committee Chair, shall monitor MSBA model policy releases and updates on at least an annual basis. This monitoring shall occur at the start of each governance year as part of the preparation of the annual policy review calendar.

When MSBA releases a revised or new model policy relevant to an SCPA Board policy, the Designated Governance Committee Member or Board Clerk shall:

- note the update in the policy review calendar alongside the affected SCPA policy;
- flag the affected policy for Governance Committee review in the current or immediately following review cycle, regardless of where it falls in the rolling three-year schedule;
- include the MSBA release notice or summary as part of the pre-review distribution materials for the affected policy.

The Governance Committee is not obligated to adopt MSBA model language but shall document in meeting minutes its rationale when it elects not to conform to a material MSBA update.

Subscriptions, listservs, or other services necessary to monitor MSBA policy releases shall be maintained by the Designated Governance Committee Member or Board Clerk or administration as a standing operational responsibility.

iv. Pre-Review Distribution

No later than one (1) week prior to committee review, the Designated Governance Committee Member or Board Clerk shall distribute:

- the current policy version;
- revision history, if applicable;
- proposed edits or tracked changes;

- supporting legal or procedural references.

Committee members are expected to review materials in advance.

v. Committee Review and Revision

During the Governance Committee meeting, the committee shall review:

- legal compliance if not an MSBA template;
- clarity and consistency of language;
- governance implications;
- operational feasibility

The committee may:

- recommend advancement as drafted;
- revise and return for further review;
- seek legal or administrative consultation;
- table for additional information.

vi. Draft Revision

Within five (5) business days following committee review, the Designated Governance Committee Member or Board Clerk shall prepare:

- a clean draft copy;
- a redline draft copy;
- a revision summary.

vii. Executive Committee Review

The Executive Committee shall review recommended policies prior to their placement on the Board agenda.

The Executive Committee may:

- place the item on the next Board agenda;
- return the item to the Governance Committee;
- request additional review.

The Executive Committee shall complete its review and render a determination within twenty-one (21) calendar days of receiving a recommended policy from the Governance Committee. If the Executive Committee has not acted within that window, the Governance Committee Chair may request a status update in writing. If no determination is made within thirty (30) calendar days of receipt, the Governance Committee Chair may place the item directly on the next Board agenda, noting the absence of Executive Committee action in the Board packet.

The Executive Committee's determination — including the date received and the date of action or non-action — shall be recorded by the Designated Governance Committee Member or Board Clerk in the policy's revision history.

viii. Board Review and Adoption

Policy revisions shall be presented to the Board for action.

Substantive policy revisions should ordinarily include:

- a first read for discussion;
- a second read and adoption vote at a subsequent Board meeting.

Technical or clerical revisions may be approved in a single reading at the discretion of the Board Chair and Executive Committee.

Definitions: Technical and Substantive Revisions

Substantive revisions are changes that alter the meaning, scope, rights, obligations, or policy of the Board. Examples include:

- adding or removing a requirement, prohibition, or right;
- changing eligibility criteria, timelines, or decision-making authority;
- modifying roles and responsibilities in a material way;
- adopting a new policy position or philosophy;
- any revision flagged by legal counsel as having compliance implications.

Technical or clerical revisions are changes that do not alter the meaning or effect of a policy. Examples include:

- correcting spelling, grammar, or punctuation errors;
- updating cross-references to reflect renumbering of other policies;
- correcting titles, dates, or names to reflect organizational changes;
- reformatting or reorganizing sections without changing substance;
- updating statutory citations where the underlying law is unchanged.

The committee acknowledges that while there may appear to be grammatical or stylistic errors in MSBA model language, unless the committee directs otherwise, certain grammatical or stylistic revisions are not necessary when maintaining consistency with MSBA standards, which should take precedence over individual preferences for phrasing or form. Any deviations from typical grammar usage are deliberate and serve to preserve uniformity across related documents and procedures.

In cases of disagreement about whether a revision is technical or substantive, the matter shall be treated as substantive and proceed through a two-reading process. The Board Chair's characterization may be appealed by any Board member at the time of presentation.

F. FINALIZATION AND PUBLICATION

Following Board adoption, the Designated Governance Committee Member or Board Clerk shall, within five (5) business days:

- update the official policy manual;
- record the date of Board action;
- archive prior versions;
- update website and board repository copies;
- communicate changes to the administration as appropriate.

Within ten (10) business days of Board adoption of any policy revision, the Designated Governance Committee Member or Board Clerk shall notify the Executive Director in writing of the adopted change. The Executive Director shall be responsible for ensuring the appropriate communication of policy changes to affected staff.

For policies with direct operational impact on staff or students, the Executive Director shall:

- distribute written notice of the change to affected personnel, identifying the specific policy and the nature of the revision;
- update any related internal procedures, handbooks, or staff-facing documents to reflect the revised policy;
- confirm in writing to the Designated Governance Committee Member or Board Clerk that notification has been completed, within fifteen (15) business days of receiving notice from the Designated Governance Committee Member or Board Clerk.

Policies with direct operational impact include, at minimum: personnel and employment policies, student discipline and safety policies, data privacy policies, and any policy that creates or removes a staff or student right or obligation.

For technical or clerical revisions, a general policy update notice to the Executive Director is sufficient.

G. EMERGENCY OR INTERIM REVISIONS

When immediate legal or compliance action is required, the Executive Committee may authorize an expedited review process.

Definition of Emergency: An “emergency” for purposes of this section is limited to situations in which: (a) a change in applicable law or regulatory requirement takes immediate effect and existing policy language is in direct conflict or creates a compliance risk; (b) a court order, authorizer directive, or audit finding requires immediate policy correction; or (c) a significant legal liability or student safety concern requires urgent Board action. A desire for expedience or administrative convenience does not constitute an emergency.

Authorization: The Executive Committee may authorize an emergency revision only by affirmative action of a majority of the Executive Committee. The basis for the emergency determination shall be documented in writing and retained by the Designated Governance Committee Member or Board Clerk.

Scope: Emergency revisions shall be limited in scope to the specific provision(s) requiring immediate correction. Broader policy restructuring shall not be conducted under emergency authority.

Ratification: Emergency revisions shall be presented to the Governance Committee and the full Board for formal review and ratification no later than the next regularly scheduled Board meeting, or within forty-five (45) days of the emergency action, whichever is sooner. If the Board does not ratify the emergency revision, the prior policy language shall be restored pending a standard review process.

Notification: The Designated Governance Committee Member or Board Clerk shall notify all Board members promptly upon authorization of an emergency revision, including the written basis for the emergency determination.

H. REVIEW OF THIS PROCEDURE

This procedure shall be reviewed by the Governance Committee at least once every three (3) years.