

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES
GOVERNING THE STUDENT PROTECTION ACT
PUBLIC COMMENTS AND RESPONSES**

Commenter Name: Aaron Randolph, Cabot School District, Superintendent, April 15, 2024

Comments: Submitted Electronically

Section 3.01.4 (p. 2) expands the definition with whom districts cannot enter into transactions. The definition of “transaction” includes even the most informal arrangement where the district does not even have to receive any benefit as a result of it. (2.04, p. 1). This could be interpreted as even a guest speaker in a classroom or a chaperone on a field trip. Our CTE department includes agreements with MEMS, Cabot Fire Department, and a practice in the Unity Health network. All of these could be included as a group that would likely share an “abortion referral,” which can be simply directing where a pregnant woman could learn about abortions. (2.2, p. 1)

Division Response: **Comment considered; no changes made. The concerns addressed by this comment are governed by statutory provisions.**