Requirements for Establishing a Trust

This document provides current requirements concerning establishment of a benefit trust by school districts for postemployment benefits. Financial information in a school district annual report to the Minnesota Department of Education (MDE) must be based on the accounting system prescribed in the Uniform Financial Accounting and Reporting Standards (UFARS) Manual.

These requirements apply to all postemployment benefit plans where the district is providing for such benefits by contributions to a legally established revocable or irrevocable trust. Reference Minnesota Statutes, section 471.6175, Subdivision 7, (Minnesota Laws 2008, Chapter 154, Article 10, Section 18) for the restrictions on the withdrawal of funds and termination of account for revocable and irrevocable trusts.

Unless a school district has established a trust, postemployment benefits are reported as a cost when payment for the benefit is made. This is a pay-as-you-go method, in contrast to recording cost when earned, that is, recording a cost as employees are providing services to the district. If pay-as-you-go payments are made out of the operating funds of the district, those payments are considered contributions in relationship to the ARC. This does not prohibit districts from establishing trusts for select groups of employees, while using pay-as-you-go for other groups.

MDE recognizes that postemployment benefits may represent a significant liability that districts may want to fund. MDE also acknowledges that it is fiscally appropriate to have the cost and funding recognized and provided for such benefits as they are earned.

- UFARS has a separate reserve account, Reserve for OPEB Liabilities Not Held in a Trust (Balance Sheet 452), for reporting bond proceeds set aside and restricted/reserved for postemployment benefits.
- UFARS has a separate internal service fund, Postemployment Benefits Revocable Trust (Fund 25), for reporting resources set aside and held in a revocable trust arrangement for postemployment benefits.
- UFARS has a separate accounting fund, Postemployment Benefits Irrevocable Trust Fund (Fund 45), for reporting resources set aside and held in an irrevocable trust arrangement for postemployment benefits.

The following are conditions and considerations in the use of a revocable or irrevocable Postemployment Benefits Trust Fund:

- The postemployment benefits accounted for in the fund must result from a written or implied contractual agreement as compensation for employee services. The district's obligation to pay for the benefits must accumulate during employment although the actual benefits are provided and payment for the provided benefits does not occur until after employment.
- The school board must agree in a formal, legally constituted trust agreement to establish a trust to hold and disburse resources set aside for the postemployment benefits. Employees eligible for benefits paid through the trust shall be notified that they may obtain a copy of the trust agreement upon request.
- For an irrevocable trust, physical segregation of trust assets must be made; the trust fund may not be merely an accounting shell consisting of a fund on the district's accounting records. Trust fund assets cannot be used for purposes other than those necessary to provide benefits for which the irrevocable trust was established.
- The department, in establishing accounting and reporting requirements for postemployment benefits, is not making a legal determination as to the authority of the school district to provide a particular benefit, nor is it making a limitation on benefits that the district has authority to provide.

- Any trust fund established must be in accordance with Minnesota Statutes.

    a. Minnesota Statutes, section 471.6175, (Minnesota Laws 2008, Chapter 154, Article 10, Section 18, signed into law on March 7, 2008) gives school districts the authority to establish a trust for postemployment benefits (OPEB) under GASB 45.

    b. Minnesota Laws 2008, Chapter 154, Article 10, Section 27, validates trusts created prior to June 6, 2006.

    c. For terms of withdrawals from and termination of the trust account, reference Minnesota Statutes, section 471.6175, Subdivision 7.

- The *Codification of Governmental Accounting and Financial Reporting Standards* (GASB Cod. Sec. P20.504 [GASB 27 ¶ 39, GASB 45 ¶ 40]) issued by the Governmental Accounting Standards Board (GASB) has identified acceptable cost methods to determine the annual required contribution (ARC) necessary to fund government employee benefit plans on an actuarial method.

- The United States Office of Management and Budget, in OMB Circular A-87, has established the standards for determining costs eligible to be charged to federally funded financial programs. Districts should reference the OMB Circular A-87 for additional details (see page 19, Attachment B, Section 8(f)-Compensation for personal services, postemployment health benefits).

    a. Postretirement health benefits (PRHB) refers to costs of health insurance or health services, not included in a pension plan, for retirees and their spouses, dependents, and survivors.

    b. PRHB costs may be computed using a pay-as-you-go method or an acceptable actuarial cost method in accordance with established written policies of the governmental unit.

    c. For PRHB financed on a pay-as-you-go method, allowable costs will be limited to those representing actual payments to retirees or their beneficiaries.

    d. PRHB costs calculated using an actuarial cost method recognized by GAAP are allowable if they are funded for that year within six months after the end of that year. Costs funded after the six-month period (or a later period agreed to by the cognizant agency) are allowable in the year funded. The cognizant agency may agree to an extension of the six-month period if an appropriate adjustment is made to compensate for the timing of the charges to the federal government and related federal reimbursements and the governmental unit's contributions to the PRHB fund. Adjustments may be made by cash refund, reduction in current year's PRHB costs or other equitable procedures to compensate the federal government for the time value of federal reimbursements in excess of contributions to the PRHB fund.

    e. Amounts funded in excess of the actuarially determined amount for a fiscal year may be used as the government's contribution in a future period.

    f. When a governmental unit converts to an acceptable actuarial cost method and funds PRHB costs in accordance with this method, the initial unfunded liability attributable to prior years shall be allowable if amortized over a period of years in accordance with GAAP or, if no such GAAP period exists, over a period negotiated with the cognizant agency.

    g. To be allowable in the current year, the PRHB costs must be paid either to: an insurer or other benefit provider as current year costs or premiums; or an insurer or trustee to maintain a trust fund or reserve for the sole purpose of providing postretirement benefits to retirees and other beneficiaries.

    h. The federal government shall receive an equitable share of any amounts of previously allowed postretirement benefit costs (including earnings thereon) which revert or inure to the governmental unit in the form of a refund, withdrawal or other credit.

- The contributions to the trust fund are to be reported as postemployment benefits up to or equal to the ARC (Object Code 252) and associated with the program code corresponding to the activities of the employee.
- The requirements identified in this section are subject to future revision to be in compliance with state and federal legal requirements and with GASB pronouncements.

Accounting Treatment

Guidelines to assist with the recording of financial transactions relating to other postemployment benefits (OPEB) expenditures are included in the next sections as follows:

- Pay-As-You-Go Funding (No Reserve or Restricted/Reserved in Fund 01 – Balance Sheet 452)
- Revocable Trust Fund Established (Fund 25)
- Irrevocable Trust Fund Established (Fund 45)

The guidelines represent the entries for the governmental funds only and do not include reporting required on the government-wide statements. Any difference between the Annual Required Contribution (ARC) and the amount paid or funded represents an underpayment or overpayment and must be reported on the government-wide statements.

All costs need to be recorded to the appropriate program codes. Do not use Program Code 930 for object codes 191, 252, 290 or 291. See Chapter 13 of the UFARS Manual referencing federal indirect cost rates.

Implicit Rate Subsidy

If your insurance plan covers both active employees and current retirees under the same premium, an implicit rate subsidy may have been calculated in your actuarial determination. The health insurance payment for retirees must be paid based on the value of the premium that was used in the determination rather than the actual cost of the premium. You may be able to determine this value from your actuarial study or you may need to contact your actuary. Since the premiums for active employees are subsidizing the retiree portion of the insurance plan, any variance between the value of the premium and premium actually charged the district goes back to the district and is accounted for by a reduction to the active employee costs for health insurance.

Determine Allocation of Contribution

To meet UFARS guidelines and federal reporting requirements, costs must be allocated equitably across all employees within the class. One method to achieve this may be to establish a contribution rate to apply to current employees eligible for postemployment benefits. Another method to achieve this consistency may be to divide the contribution by the total number of current employees eligible for postemployment benefits. Whatever method is used, the funds must be equitably distributed across all employees within the class that are eligible for postemployment benefits being funded.

Method #1 Based on Eligible Payroll

1a. Determine which postemployment benefits to include in the funding and the employee groups that are eligible for those benefits. You may want to refer to your actuary report for this information. For example, if all employees receive the same postemployment benefit then all employee groups will be included. If only teachers are eligible for the postemployment benefit to be funded, then only teachers would be included.

1b. Determine amount of eligible payroll for the affected employees.

1c. Divide the value of the postemployment benefits for the group by the eligible payroll for the group to get a contribution rate.

1d. Apply the contribution rate through the payroll system.

Example:

In the following example, the amount to be contributed to the trust for other postemployment benefits is $1,031,999. The district's total ARC is $1,250,908, which means the district is funding the trust at a rate of 82.5 percent. The contribution does not exceed the ARC. If it did, the excess would not be eligible for federal aid and would not be allocated using the contribution rate for that year. See OMB Circular A-87, section 8(f), for instructions related to amounts funded in excess of the actuarially determined amount.

OPEB is provided to teachers, administrators, food service workers and secretaries so the wages from all four of these groups are included in the calculation of the OPEB contribution rate. Wages for nurses, custodial/maintenance and paraprofessionals are not included because these employee groups do not participate in the benefits being funded.

Administrator	$1,573,622
Health	
Custodial/Maintenance	N/A
Food Service	251,528
Paraprofessionals	N/A
Secretary	1,758,212
Teacher	16,668,655
Total Wages Basis	**$20,252,017**
Health insurance	$979,994
Dental insurance	50,567
Life insurance	1,438
Amount to be funded	**$1,031,999**
Contribution rate:	
(1,031,999 divided by 20,252,017)	5.10%

Method #2 Based on Number of Employees

2a. Determine which postemployment benefits to include in the funding and the employee groups that are eligible for those benefits. You may want to refer to your actuary report for this information. For example, if all employees receive the same postemployment benefit then all employee groups will be included. If only teachers are eligible for the postemployment benefit to be funded, then only teachers would be included.

2b. Divide the contribution dollar amount for the group by the eligible employees in the group to get a contribution dollar amount.

2c. Apply the dollar amount through the payroll system.

Example

In the following example, the amount to be contributed to the trust for other postemployment benefits is $1,031,999. The district's total ARC is $1,250,908 which means the district is funding the trust at a rate of 82.5 percent. The contribution does not exceed the ARC. If it did, the excess would not be eligible for federal aid and would not be allocated using the contribution amount for that year. See OMB Circular A-87, section 8(f), for instructions related to amounts funded in excess of the actuarially determined amount.

For this example, OPEB is provided to teachers, administrators, food service workers and secretaries so the employees from all four of these groups are included in the calculation of the OPEB contribution amount. Nurses, custodial/maintenance and paraprofessionals are not included because these employee groups do not participate in the benefits being funded.

Example:	
Health insurance	$979,994
Dental insurance	50,567
Life insurance	1,438
Amount to be funded	**$1,031,999**
Total employees in groups funded	522
Contribution rate:	
(1,031,999 divided by 522)	$1,977
Object Code	252

Financial Transaction Accounting
Other Postemployment Benefits (OPEB)
Pay-As-You-Go Funding

The following are guidelines to assist with the recording of financial transactions relating to other postemployment benefits (OPEB) expenditures. This section of the document assumes the district is reporting the postemployment benefits as a cost when payment for the benefit is made. This is a "pay-as-you-go" method, in contrast to recording cost "when earned," that is, recording a cost as employees are providing services to the district. These payments are considered as contributions in relationship to the ARC. This does not prohibit districts from establishing trusts for select groups of employees, while using "pay-as-you-go" for other groups.

The following guidelines are presented in the order in which tasks are generally performed.

Transaction	Total Cost	Employees	Retirees
Health insurance	25,000.00	20,000.00	5,000.00
Implicit rate subsidy		(500.00)	500.00
Total Health Insurance and Implicit rate subsidy	**25,000.00**	**19,500.00**	**5,500.00**
Dental insurance	4,000.00	3,000.00	1,000.00
Life insurance	5,000.00	3,500.00	1,500.00
Total Payment	**34,000.00**	**26,000.00**	**8,000.00**
Retiree contribution	(1,000.00)	0.00	(1,000.00)
Net Cost	**33,000.00**	**26,000.00**	**7,000.00**

Step 1 – Record payments for member benefits

For illustration purposes only, the following transactions assume the following total monthly insurance premium for all employees and retirees:

1a. Record payment to provider of health insurance.

DR:	OPEB Costs (Operating Fund, Program, Object Code 291)	5,500	
DR:	Health Insurance (Operating Fund, Program, Object Code 220)	19,500	
CR:	Operating Fund, Cash or Investment Account		25,000

1b. Record payment to provider of dental insurance.

DR:	OPEB Costs (Operating Fund, Program, Object Code 291)	1,000	
DR:	Dental Insurance (Operating Fund, Program, Object Code 235)	3,000	
CR:	Operating Fund, Cash or Investment Account		4,000

1c. Record payment to provider of life insurance.

DR:	OPEB Costs (Operating Fund, Program, Object Code 291)	1,500	
DR:	Life Insurance (Operating Fund, Program, Object Code 230	3,500	
CR:	Operating Fund, Cash or Investment Account		5,000

1d. If applicable, recognize retiree share of benefit costs.

DR:	Operating Fund, Cash or Investment Account	1,000	
CR:	Health insurance (Operating Fund, Program, Object Code 291)		1,000

Note: If payment is made with bond proceeds held in the Restricted/Reserved for OPEB Liabilities Not Held in a Trust (Balance Sheet 452) instead of unassigned operating funds, then the Finance Code 793 should be included with the Object Code 291 entries 1a, 1b, 1c, and 1d. Refer to the Bonding for OPEB Liabilities section below for more details.

Step 2 – Set up additional amount earmarked by school board

For illustration purposes only, the following transaction assumes the school board approved an increase of $100,000 to the designation for OPEB. No designation is recorded in UFARS. However, districts may want to use a unique code at the local level to identify designated funds.

DR:	Unassigned Fund Balance	100,000	
CR:	Designated for future OPEB contributions (Committed Fund Balance)		100,000

Financial Transaction Accounting
Other Postemployment Benefits (OPEB)
Revocable Trust Fund Established (Fund 25)

The following are guidelines to assist with the recording of financial transactions relating to other postemployment benefits (OPEB). This document assumes the district has met all requirements for the establishment of a revocable trust for other postemployment benefits (OPEB). For this information, please refer to *Requirements for Establishing a Trust* earlier in this section.

The following guidelines are presented in the order in which tasks are generally performed.

Step 1 – Contribution to the revocable trust to fund the Annual Required Contribution (ARC)

For illustration purposes, the following transactions assume a monthly cost allocation for postemployment benefits to one individual with wages of $25,000 and using allocation Method 1, as shown below.

Health Insurance	$1,200	($25,000 x 4.80%)
Dental Insurance	$50	($25,000 x .20%)
Life Insurance	$25	($25,000 x .10%)
	$1,275	5.10%

1a. Record OPEB expenditures through the payroll system. Amount based on contribution rate.

DR:	Operating Fund, Program, Object 252	1,275	
CR:	Payroll Liability Account (Liability 215)		1,275

1b. Record contribution from district to Employee Benefit Trust Fund.

DR:	Payroll Liability Account (Liability 215)	1,275	
CR:	Operating Fund, Cash or Investment Account		1,275

1c. Record contribution in Employee Benefit Trust Fund (Fund 25) received from district.

DR:	Fund 25, Cash or Investment Account	1,275	
CR:	Fund 25, contributions to Employee Benefit Trust (Source Code 614)		1,275

Step 2 – Additional contribution to the revocable trust in excess of the Annual Required Contribution (ARC)

For illustrative purposes, the district makes a current year contribution of $200,000 in excess of the ARC.

2a. Record contribution from district to revocable Employee Benefit Trust Fund.

DR:	Operating Fund, Program, Object Code 290	200,000	
CR:	Operating Fund, Cash or Investment Account		200,000

2b. Record contribution in revocable Employee Benefit Trust Fund (Fund 25) received from district.

DR:	Fund 25, Cash or Investment Account	200,000	
CR:	Fund 25, contributions to revocable Employee Benefit Trust (Source Code 614)		200,000

Step 3 - Record payments from trust fund for member benefits

The following illustrates transactions that occur in the employee benefit trust fund and how they are accounted for. For illustration purposes only, the following transactions assume a monthly insurance premium for one current retiree.

Health Insurance	$1,500 (actual premium)
Health Insurance	$1,800 (value of premium)
Health Insurance	$300 (implicit rate subsidy)
Dental Insurance	$400
Life Insurance	$100

3a. If applicable, to recognize retiree share of benefit costs (2% of health insurance premium).

DR:	Fund 25, Cash or Investment Account	30	
CR:	Fund 25, plan member contributions (Source Code 616)		30

3b. Record direct payment for retiree, from trust fund, to provider of health insurance.

DR:	Fund 25, trust fund disbursements (Program Code 935, Object Code 220)	1,500	
CR:	Fund 25, Cash or Investment Account		1,500

3c. Record payment to district operating funds to cover implicit rate subsidy.

DR:	Fund 25, Trust Fund disbursements (Program Code 935, Object Code 220)	300	
CR:	Fund 25, Cash or Investment Account		300
DR:	Operating Fund, Cash or Investment Account	300	
CR:	Operating Fund, Program, Object Code 220		300

3d. Record direct payment for retiree, from trust fund, to provider of dental insurance.

DR:	Fund 25, Trust Fund disbursements (Program Code 935, Object Code 235)	400	
CR:	Fund 25, Cash or Investment Account		400

3e. Record direct payment for retiree, from trust fund, to provider of life insurance.

DR:	Fund 25, Trust Fund disbursements (Program Code 935, Object Code 230)	100	
CR:	Fund 25, Cash or Investment Account		100

3f. If your district pays the premiums on retirees in combination with active employees, the payment would be accounted for as follows. Keep in mind that the benefit may not be paid from the trust until it has been incurred. Withdrawing money from the trust prior to payment of the benefit may be in violation of the trust agreement as well as IRS regulations.

Record payment from trust fund to district.

DR:	Fund 25, Trust Fund disbursements (Program Code 935, Object Code 220)	1,800	
CR:	Fund 25, Cash or Investment Account		1,800
DR:	Fund 01, Cash or Investment Account	1,800	
CR:	Fund 01, Payroll Liability Account (Liability 215)		1,800

Record payment by district to provider:

DR:	Fund 01, Payroll Liability Account (Liability 215)	1,500	
CR:	Fund 01, Cash or Investment Account		1,500
DR:	Fund 01, Payroll Liability Account (Liability 215)	300	
CR:	Operating Fund, Program, Object Code 220		300

Financial Transaction Accounting Other Postmployment Benefits (OPEB)
Irrevocable Trust Fund Established (Fund 45)

The following are guidelines to assist with the recording of financial transactions relating to other postemployment benefits (OPEB). This document assumes the district has met all requirements for the establishment of an irrevocable trust for other post-employment benefits (OPEB). For this information, please refer to *Requirements for Establishing a Trust* earlier in this section.

The following guidelines are presented in the order in which tasks are generally performed.

Step 1 – Contribution to the irrevocable trust to fund the Annual Required Contribution (ARC)

For illustration purposes, the following transactions assume a monthly cost allocation for postemployment benefits to one individual with wages of $25,000 and using allocation Method 1, as shown below.

Health insurance	$1,200	($25,000 x	4.80%)
Dental insurance	$50	($25,000 x	.20%)
Life insurance	$25	($25,000 x	.10%)
	$1,275		5.10%

1a. Record OPEB expenditures through the payroll system. This amount is for funding the ARC only and is based on the contribution rate.

DR:	Operating Fund, Program, Object Code 252	1,275	
CR:	Payroll Liability Account (Liability 215)		1,275

1b. Record contribution from district to irrevocable Employee Benefit Trust Fund.

DR:	Payroll Liability Account (Liability 215)	1,275	
CR:	Operating Fund-Cash or Investment Account		1,275

1c. Record contribution in irrevocable Employee Benefit Trust Fund (Fund 45) received from district.

DR:	Fund 45, Cash or Investment Account	1,275	
CR:	Fund 45, Contributions to Irrevocable Employee Benefit Trust (Source Code 614)		1,275

Step 2 – Additional contribution to the irrevocable trust in excess of the Annual Required Contribution (ARC)

For illustrative purposes, the district makes a current year contribution of $200,000 in excess of the ARC.

2a. Record contribution from district to irrevocable Employee Benefit Trust Fund.

DR:	Operating Fund, Program, Object Code 290	200,000	
CR:	Operating Fund, Cash or Investment Account		200,000

2b. Record contribution in irrevocable Employee Benefit Trust Fund (Fund 45) received from district.

DR:	Fund 45, Cash or Investment Account	200,000	
CR:	Fund 45, Contributions to Irrevocable Employee Benefit Trust (Source 614)		200,000

Step 3 – Record payments from trust fund for member benefits

The following illustrates transactions that occur in the employee benefit trust fund and how they are accounted for. For illustration purposes only, the following transactions assume a monthly insurance premium for one current retiree:

Health insurance	$1,500 (actual premium)
Health insurance	$1,800 (value of premium)
Health insurance	$300 (implicit rate subsidy)
Dental insurance	$400
Life insurance	$100

3a. If applicable, to recognize retiree share of benefit costs (2% of health insurance premium):

DR:	Fund 45, Cash or Investment Account	30	
CR:	Fund 45, plan member contributions (Source Code 616)		30

3b. Record direct payment for retiree, from trust fund, to provider of health insurance.

DR:	Fund 45, Trust Fund disbursements (Program Code 935, Object Code 220)	1,500	
CR:	Fund 45, Cash or Investment Account		1,500

3c. Record payment to district operating funds to cover implicit rate subsidy.

DR:	Fund 45, Trust Fund disbursements (Program Code 935, Object Code 220)	300	
CR:	Fund 45, Cash or Investment Account		300
DR:	Operating Fund, Cash or Investment Account	300	
CR:	Operating Fund, Program, Object Code 220		300

3d. Record direct payment for retiree, from trust fund, to provider of dental insurance.

DR:	Fund 45, Trust Fund disbursements (Program Code 935, Object Code 235)	400	
CR:	Fund 45, Cash or Investment Account		400

3e. Record direct payment for retiree, from trust fund, to provider of life insurance.

DR:	Fund 45, Trust Fund disbursements (Program Code 935, Object Code 230)	100	
CR:	Fund 45, Cash or Investment Account		100

3f. If your district pays the premiums on retirees in combination with active employees, the payment would be accounted for as follows. Keep in mind that the benefit may not be paid from the trust until it has been incurred. Withdrawing money from the trust prior to payment of the benefit may be in violation of the trust agreement as well as IRS regulations.

Record payment from trust fund to district:

DR:	Fund 45,Trust Fund disbursements (Program Code 935, Object Code 220)	1,800	
CR:	Fund 45, Cash or Investment Account		1,800
DR:	Fund 01, Cash or Investment Account	1,800	
CR:	Fund 01, Payroll Liability Account (Liability 215)		1,800

Record payment by district to provider:

DR:	Fund 01, Payroll Liability Account (Liability 215)	1,500	
CR:	Fund 01, Cash or Investment Account		1,500
DR:	Fund 01, Payroll Liability Account (Liability 215)	300	
CR:	Operating Fund, Program, Object Code 220		300

Bonding for OPEB Liabilities

The Omnibus Tax Bill (2008 Minn. Laws, Chapter 154, Article 10) contains a provision that provides authority for school district boards to issue bonds without voter approval for funding actuarial liabilities to pay other postemployment benefits (OPEB), as defined by the Governmental Accounting Standards Board (GASB) Statement No. 45. A district may annually make a debt service levy in the newly created OPEB Debt Service Fund (Fund 47) to service the payment of principal and interest on those bonds.

The Minnesota Department of Education has worked with the Office of the State Auditor (OSA), the Advisory Committee on Financial Management, Accounting and Reporting, the GASB 45 Committee, and other individuals to determine the extent of the authority provided by the law and to develop accounting procedures for districts whose school boards choose to issue these taxable bonds.

Based on the legislation and consultation, it has been determined that districts issuing bonds should record the bond proceeds into the Operating Funds (Funds 01, 02, and/or 04) and transfer the funds to the appropriate account, if necessary. The bond proceeds may be held in a separate account within the Operating Funds if no trust account is established (Balance Sheet Account 452), a Revocable Trust Internal Service Fund (Fund 25), or an Irrevocable Trust Fund (Fund 45). A summary of accounting entries are identified as follows:

Special Thanks to the GASB 54 Committee

Members of the Division of School Finance of the Minnesota Department of Education extend their appreciation to each member of the GASB 54 Committee for their work on this project.

Committee Members:	***Affiliation:***
David Peterson, Chair	Saint Paul Public Schools, ISD 625
Pat Chaffey	Hermantown Public Schools, ISD 700
Tracey Fiereck	CmERDC – Region 3
Greg Hierlinger	Office of the State Auditor
Myrna Meunier	New Ulm Public Schools, ISD 88
Pat Morphew	Worthington Public Schools, ISD 518
Nancy Schulzetenberg	Kern DeWenter, Viere
Darwin Viker	Clifton, Larson Allen LLC
Sandra Weston	Saint Paul Public Schools, ISD 625
Jeff Yeager	A.R.C.C. – Region 2

Department of Education Staff:
Audrey Bomstad
Lisa DeRemee
Greg Hein
Sarah Miller
Mary Weigel