

Procedure #3001
Title: PERSONA NON GRATA (PNG)
Category: Administration
Date of Initial Approval: 03-31-2026
Date(s) of Review/Revisions:
Reviewers: MSA Department Heads

I. PURPOSE

This procedure outlines how MSA may designate an individual (non-student) as Persona Non Grata (PNG), restricting their access to MSA property when their behavior poses harm or disruption. MSA administrators have the discretion of removing any non-student individuals from MSA immediately following a harmful or disruptive incident but must follow steps below for long-term restrictions. MSA employees and/or administrators may contact the superintendent or the on-call supervisor for support with this process.

The superintendent and/or the on-call supervisor has the discretion of temporarily putting individuals on PNG status. This placement on PNG status will continue until further notice is sent out to MSA staff. The length of the temporary PNG status will vary, pending completion of investigations and will be communicated with MSA staff as appropriate. Communications will include the name of the individual, a description and/or a picture of the individual, and steps to follow if the individual is seen on the MSA campuses. When the temporary PNG status expires, the superintendent and/or the on-call supervisor will send out an update to MSA staff.

This procedure does not apply to students – that is governed by Minnesota’s Pupil Fair Dismissal Act (PFDA) – MN Statute 121A.40-56 which provides protections for suspensions, expulsions, and exclusions. Please refer to MSA Policy #532 for additional information regarding students.

II. LEGAL AUTHORITY AND DEFINITIONS

To maintain the state's compelling interest in the safe and orderly operation of the MSAB/MSAD campuses and school activities, MSA officials have the authority to address the conduct of individuals whose actions negatively impact school operations or activities.

MSA may prohibit entry to and provide for the removal from any MSA building or grounds of any person that has displayed behavior that:

- Threatens safety of staff/students or property.
- Violates school policy or law.
- Harasses or intimidates staff, students, or others.
- Disrupts school operations repeatedly.
- Violates prior restrictions or warnings.

Such behavior must be documented in detail and reviewed by MSA administration.

Definition: **Persona Non Grata (PNG)** is a status assigned to a non-student individual whose presence on MSA property is deemed disruptive, threatening, or otherwise inappropriate, and who is therefore barred from entering school grounds or attending school-sponsored events/activities for an extended period of time. If individuals on PNG status are seen on campus, MSA administrators will take action to remove that individual, including the possibility of contacting local law enforcement for support.

III. PROCEDURAL STEPS

A. Incident Documentation

- Staff members and/or administrators may request that an individual be placed on PNG status – the request must be accompanied with information about the person being considered for PNG determination (incident reports, court convictions, witness statements, etc.)
- The request must be sent in writing (email is acceptable) to the employee's supervisor. The supervisor, in turn, will submit the information to the PNG review team.

B. Initial Administrative Review

- The PNG review team reviews the incident(s), gathers additional information, and consults legal counsel, as necessary.
- Members of the PNG review team are: MSAB Director; MSAD Director; MSA Director of Student Support Services; MSA Director of Curriculum and Educational Programs; and MSA Director of Student Life. The team may meet virtually as necessary to respond to requests as promptly as possible.

C. Notice of Intent

- A Notice of Intent to designate an individual as Persona Non Grata must be sent via certified mail and email (if available) to the individual. The notice should include:
 - A description of the incident(s)
 - Grounds for PNG proposal
 - Proposed scope and duration of restriction
 - Options for an administrative review meeting and how to request one.
- A copy of this notice must be sent to the Director of Human Resources.

D. Optional Review Meeting

- The individual has the right to request a meeting within ten business days after receiving the notice to present their side. This is not a formal legal hearing – this is an opportunity for the individual to share additional information for consideration.
- The Director of Human Resources is responsible for listening to the information presented during the review meeting and gathering additional documentation, if necessary, for the final determination.

E. Final Determination

- After review (and optional review meeting if held), the Director of Human Resources will issue a Final Decision Letter containing:
 - Confirmed PNG status (effective date and duration)
 - Specific scope (campus, events, communications)
 - Appeal rights
- The Director of Human Resources is responsible for ensuring that decisions are consistent with Minnesota Human Rights Act protections (no discrimination based on protected classes).

F. Annual Review

- All PNG designations will be reviewed annually in July and either allowed to expire or renewed for the following school year. The PNG review team manages this review process and submits recommendations to the Director of Human Resources for final review, implementation, and communication.
- Individuals may submit additional information, evidence, or statements to the Human Resources office to support reconsideration of their PNG designation.

G. Appeal Rights

- Anyone affected by this process can submit a written appeal for reconsideration to the superintendent's office (within ten business days) if they believe that policies were misapplied or discrimination occurred.
- The superintendent will review the appeal and respond to the individual within ten business days.

IV. PERSONA NON GRATA DIRECTORY

The Director of Human Resources will maintain an up-to-date directory of all individuals with PNG designations to be shared confidentially with MSA employees, department supervisors, and security officers. This information will only include the name, picture, and duration of the PNG designation. Details of the incident(s) will be kept confidential within the Human Resources office (with access granted to the On-Call supervisory team).