

CHILDREN IN CONFINEMENT

Seclusion in Schools



Minnesota Disability Law Center

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TABLE OF CONTENTS

1 EXECUTIVE SUMMARY

Summary of Key Findings

4 INTRODUCTION

What is Minnesota Disability Law Center?

What is monitoring?

What is seclusion in schools?

What is the history of seclusion in Minnesota?

Who uses seclusion in Minnesota?

What are the laws on seclusion rooms in Minnesota?

12 METHOD FOR SECLUSION ROOM MONITORING PROJECT

15 KEY FINDINGS

1: Concrete Floors with Hard or Padded Walls are Typical for School Seclusion Rooms

2: Calming & Sensory Rooms are Distinct from Seclusion Rooms in Use and Environment

3: No Accurate List of Registered Seclusion Rooms is Publicly Available

4: Seclusion Rooms Do Not Universally Meet State Building Requirements

56 CONCLUSION

57 APPENDICES

EXECUTIVE SUMMARY

“Seclusion” is the involuntary confinement of a child with disabilities alone in any room or area of a public school building. When a school staff member determines that a child with disabilities displays behavior which may cause physical injury to themselves or others, the school staff may physically transport and isolate that child in a dedicated small, locked room within the school building called a “seclusion room.” Minnesota law permits a school district to register seclusion rooms and isolate children with disabilities in these rooms during an emergency.¹ In this case, an “emergency” means a “situation where immediate intervention is needed to protect a child or other individual from physical injury.”²

Under Minnesota law, schools must register seclusion rooms with the Minnesota Department of Education (MDE) and ensure they meet certain architectural requirements.³ Although schools are required to register their seclusion rooms with MDE, they are not required to publicize to parents or the community that the district uses seclusion. In early summer 2025, Minnesota Disability Law Center (MDLC), part of Mid-Minnesota Legal Aid, requested information about registered seclusion rooms from MDE under the Minnesota Government Data Practices Act.⁴ MDE provided a list of seclusion rooms that school districts registered for the 2024-25 school year and a list of school districts that reported using seclusion in the 2024-25 school year.⁵

MDE’s list contained 194 seclusion rooms, located in 100 school buildings within fifty (50) school districts across the state in the 2024-25 school year. *See Appendix A: MDE List of Registered Seclusion Rooms in 2024-25 School Year.* MDLC found that registered seclusion rooms generally follow the standard distribution of Minnesotan population: rooms are densely located in the Twin Cities Metro area and scattered throughout greater Minnesota. *See Appendix C: Map of Registered Seclusion Rooms.* MDLC found seclusion rooms in all types of school settings, although they are more likely to be located in more restrictive public school settings for children with disabilities who have greater needs (Level 3 and 4 settings).

Adjacent school districts who serve children with the same types of disabilities in the same Level 4 settings have vastly different reliance on seclusion: Some Level 4 settings prohibit the use of seclusion and have no registered seclusion rooms, while other Level 4 settings contain a seclusion

¹ Minn. Stat. § 125A.0942.

² Minn. Stat. § 125A.0941(b) defines “emergency”: “Emergency” means a situation where immediate intervention is needed to protect a child or other individual from physical injury. Emergency does not mean circumstances such as: a child who does not respond to a task or request and instead places his or her head on a desk or hides under a desk or table; a child who does not respond to a staff person’s request unless failing to respond would result in physical injury to the child or other individual; or an emergency incident has already occurred and no threat of physical injury currently exists.

³ Minn. Stat. § 125A.0942, subd. 3(a)(7)(ii).

⁴ Minn. Stat. § 13.01 *et. seq.*

⁵ The request was made to MDE in early summer 2025. The most current list available was for the 2024-25 school year.

EXECUTIVE SUMMARY

room for every third child in the building. This indicates the use of seclusion is dependent upon school culture. Indeed, 40% of all seclusion rooms in the state are located in just four school districts.

In late summer 2025, MDLC staff picked a representative cross section of seclusion rooms across the state to monitor that reflected a diverse geography and student population served, the total number of students served by the school district, and whether the seclusion room was located in an intermediate school district or cooperative (one school district that serves multiple member districts), or an independent school district.

Using these factors, MDLC selected approximately eighty (80) registered seclusion rooms in twenty-six (26) school buildings to monitor. These monitoring visits included tours and photographs of seclusion rooms and brief interviews with school administrators conducting the tours. MDLC provided at least one month's advance notice to school administrators that MDLC would monitor their seclusion rooms.

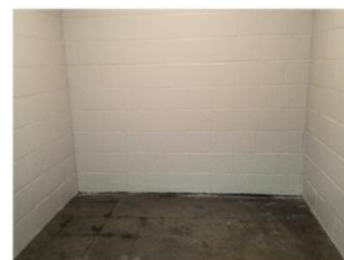
MDLC key findings include:

Key Finding 1: Concrete Floors with Hard or Padded Walls are Typical for School Seclusion Rooms

The majority of seclusion rooms have beige cinder block walls, although newer constructed rooms tend to have padded walls. Padded walls can be used for mitigation of self-injurious behavior when a child is locked inside the seclusion room. Most seclusion room floors are non-carpeted, such as concrete slabs, for ease of cleaning up bodily fluids. These rooms are typically small, closet-sized spaces, and are located in isolated areas of a school building.

Key Finding 2: Calming & Sensory Rooms are Distinct from Seclusion Rooms in Use and Environment

Unlike seclusion rooms, students can generally use calming or sensory rooms at their will, as opposed to being restricted or physically placed in a seclusion room by an adult. These rooms are larger than seclusion rooms (often calming rooms are converted classrooms). Calming rooms have various colored or soft lighting to create a calmer environment, and



Registered seclusion room with concrete, stained floors and bare cinderblock walls. Rochester Phoenix Academy – Rochester, MN



Large, colorful calming room with sensory objects for play or deescalation. Not a seclusion room. River Trail Learning Center – Coon Rapids, MN

EXECUTIVE SUMMARY

contain sensory tools such as bean bags, hammocks, foam mats, punching bags, and other occupational therapy equipment. These rooms are typically located within classrooms or near school amenities. All schools that had seclusion rooms also had calming or sensory rooms.

Key Finding 3: No Accurate List of Registered Seclusion Rooms is Publicly Available

There is no accurate, current list of school districts that have registered seclusion rooms. Many school districts that have ended the practice of using seclusion rooms are inaccurately or mistakenly left on MDE's list. Other school districts that registered seclusion rooms with MDE actually use them as storage closets or independent workspaces, which does not comply with Minnesota law.

Key Finding 4: Seclusion Rooms Do Not Universally Meet State Building Requirements

Most seclusion rooms reviewed were in compliance with the architectural requirements mandated by Minnesota statute. However, MDLC reviewed a significant number of rooms that did not meet these state requirements. Those that were not in compliance contained objects that a child may use to injure themselves or others such as a metal chair or hard desk. In addition, some rooms were in poor condition, lacked light, not ventilated, not adequately heated, appeared to have water damage, and/or contained chipped paint surfaces.

Conclusion

While the use of seclusion has decreased in the last five years in Minnesota, certain school districts have a disproportionate number of registered seclusion rooms and disproportionate reliance on the use of seclusion with children with disabilities. Additional monitoring is necessary to examine *how* seclusion is used on children with disabilities in Minnesota and the *effects* of seclusion on children with disabilities, families of children with disabilities, school staff. Additional monitoring should focus on the schools that disproportionately rely on seclusion.



A registered seclusion room being used as a closet for storing student desks out of use. SWWC Education Learning Center – Cosmos, MN



Detail of seclusion room floor with damaged and unclean floor and walls, mold or water damage appearing in cracks between floor and walls. Cambridge Intermediate School – Cambridge, MN

INTRODUCTION

What is Minnesota Disability Law Center?

The Minnesota Disability Law Center (MDLC) of Mid-Minnesota Legal Aid is the federally designated Protection and Advocacy (P&A) agency for people with disabilities in the state of Minnesota. Every state has a P&A which advocates for the rights of people with disabilities on disability rights issues. As a P&A, MDLC is tasked with protecting people with disabilities in Minnesota from abuse and neglect. To that end, MDLC uses its federal access authority to monitor and investigate a wide-range of facilities that serve people with disabilities.

Addressing the legal needs of clients with disabilities, our [Five-Year Strategic Plan](#) identifies four goals:

- ✓ Eliminate abuse and neglect
- ✓ Increase integration and decrease discrimination
- ✓ Increase access to appropriate services
- ✓ Increase statewide awareness of MDLC as an advocacy resource

What is monitoring?

As the P&A Organization for Minnesota, MDLC has the authority to reasonably access service providers, facilities, and/or programs providing care and treatment to people with disabilities during normal working hours or other reasonable times.⁶ Some examples of sites covered by MDLC's authority includes, but is not limited to, nursing homes, schools, jails, day programs, and residential facilities.

During monitoring visits, MDLC staff have "reasonable unaccompanied access" to facilities. This access authority includes the ability to inspect the facility, monitor for compliance regarding people with disabilities, provide information, and communicate privately with individuals with disabilities. During a monitoring visit, MDLC can request client directory information (name, phone, home address, guardian contact). MDLC often requests policies, demographics, and other data from the facility to better understand the program. Further, monitoring authority allows MDLC to "inspect, view and photograph" any areas of the facility used by or accessible to people with disabilities.

⁶ <https://mylegalaid.org/wp-content/uploads/2025/11/PA-Access-Authority-Memo-Content-for-External-Parties-11.12.2025-Copy.pdf>.

INTRODUCTION

What is seclusion in school?

According to the [U.S. Department of Justice](https://www.justice.gov/crt/what-seclusion), “Seclusion is the involuntary confinement of a student alone in any room or area. It includes the use of any room or area in which the student is alone and not free to leave (or believes they are not free to leave).”⁷ This is also known as “barred egress.”⁸

Seclusion is commonly used when a child with disabilities, such as Autism Spectrum Disorder, displays behavior that school staff determines may cause physical injury to the child or others. Seclusion is not supposed to be used for discipline or punishment.

Seclusions can occur in a variety of settings within a school building, for example, small padded rooms, utility closets, areas blocked off with gym mats, or empty administrative offices.⁹

Seclusions occur when a student is not free to leave any room, even if the door is unlocked or ajar, for example, if a school staff member holds an unlocked door closed or blocks the exit with a gym mat.¹⁰ Many times, seclusion will occur in a dedicated and registered “seclusion room.”

Seclusions occur when a student is alone in a room, although school staff must monitor a student through an observation window or video feed. Seclusions can occur in spaces used for “time out,” “calming down,” “de-escalation,” “quiet,” or “isolation,” if the student is alone and not free to leave. If an adult is in the room with the child, in any way, it is not seclusion. Under Minnesota statute, seclusion may only be used during an “emergency” and must “end when the threat of harm ends and the staff determines the child can safely return to the classroom or activity.”¹¹ During this project, MDLC gathered statements from school staff and children, and documentary evidence, which indicate seclusion usually lasts between thirty seconds and three hours.

⁷ U.S. Department of Justice, *What is Seclusion?*, available at: <https://www.justice.gov/crt/what-seclusion>. Last visited December 14, 2025.

⁸ Minn. Stat. § 125A.0941(g).

⁹ U.S. Department of Justice, *What is Seclusion?*, available at: <https://www.justice.gov/crt/what-seclusion>. Last visited December 14, 2025.

¹⁰ U.S. Department of Justice, *What is Seclusion?*, available at: <https://www.justice.gov/crt/what-seclusion>. Last visited December 14, 2025.

¹¹ Minn. Stat. § 125A.0942, subd. 3. Minn. Stat. § 125A.0941(b) defines “emergency”: “Emergency” means a situation where immediate intervention is needed to protect a child or other individual from physical injury. Emergency does not mean circumstances such as: a child who does not respond to a task or request and instead places his or her head on a desk or hides under a desk or table; a child who does not respond to a staff person's request unless failing to respond would result in physical injury to the child or other individual; or an emergency incident has already occurred and no threat of physical injury currently exists.

INTRODUCTION

What is the history of seclusion in Minnesota?

In 2009, the Minnesota legislature passed legislation regarding the use of restrictive procedures in public schools. These statutes: Minnesota Statutes 125A.094, 125A.0941, and 125A.0942, were passed in 2009 and made effective in 2011.¹²

In 2013, the Minnesota legislature instructed the Minnesota Department of Education (MDE) and interested stakeholders, including representatives of schools, disability advocates, mental health professionals, and parents of children who have been secluded,¹³ to develop a statewide plan to reduce school districts' use of restrictive procedures, including seclusion.¹⁴ Accordingly, MDE convened a "Restrictive Procedures Workgroup" of interested stakeholders that met regularly to discuss reducing the use of restrictive procedures in Minnesota.¹⁵

In 2016, the Minnesota legislature prohibited prone restraints in the school setting.¹⁶ In addition, the legislature tasked MDE to submit an annual report on school districts' progress in reducing the use of restrictive procedures, recommendations on how to further reduce these procedures, and recommendations on how to eliminate the use of seclusion.¹⁷

Beginning with the 2016-2017 school year, school districts were required to report data to MDE about their use of restrictive procedures.

In 2023, MDE recommended eliminating the use of seclusion in all schools, for all children, by September 1, 2026. In its mandated annual report to the legislature, MDE stated that its recommendation to eliminate seclusion was based on:

¹² Minnesota Department of Education, Report to Legislature: [School Districts' Progress in Reducing the Use of Restrictive Procedures in Minnesota Schools](https://education.mn.gov/MDE/about/rule/leg/rpt/2025Reports/), dated September 15, 2025. Available at: <https://education.mn.gov/MDE/about/rule/leg/rpt/2025Reports/>.

¹³ "Interested stakeholders" include: "parents of students who have been secluded or restrained; advocacy organizations; legal services providers; special education directors; teachers; paraprofessionals; intermediate school districts and cooperative units as defined under section 123A.24, subdivision 2; school boards; day treatment providers; county social services; state human services department staff; mental health professionals; autism experts; and representatives of groups disproportionately affected by restrictive procedures, including People of Color and people with disabilities."

¹⁴ *Id.* at 5.

¹⁵ The Restrictive Procedures Work Group meetings were suspended at the end of 2024.

¹⁶ "Prone restraint" means placing a child in a face down position. Minn. Stat. § 125A.0941(e) (2024).

¹⁷ Minnesota Department of Education, Report to Legislature: [School Districts' Progress in Reducing the Use of Restrictive Procedures in Minnesota Schools](https://education.mn.gov/MDE/about/rule/leg/rpt/2025Reports/), dated September 15, 2025. Available at: <https://education.mn.gov/MDE/about/rule/leg/rpt/2025Reports/>.

INTRODUCTION

“Minnesota’s cumulative efforts working to end the use of seclusion since 2016; the U.S. Department of Justice (DOJ) findings that seclusion and restraint practices discriminate against students on the basis of disability by denying them equal opportunity to participate in or benefit from school district education programs, using eligibility criteria that effectively subject students with disabilities to discrimination, and failing to make reasonable modifications to avoid discrimination in school programs; the Americans with Disabilities Act of 1990’s (ADA’s) integration mandate, the Individuals with Disabilities Education Act’s (IDEA’s) least restrictive environment mandate; and stakeholder engagement.”¹⁸

In 2023, the Minnesota legislature prohibited the use of seclusion from birth to grade 3 starting September 1, 2024. The use of seclusion on students from grades 4 and older was still permitted.¹⁹ Other standards for the use of seclusion were adopted by the legislature, including more oversight and communication with parents.²⁰

In May 2025, Senator Judy Seeberger, DFL-Afton, introduced an amendment on the Senate floor to the omnibus education policy bill in order to allow seclusion for students with disabilities from birth to sixth grade if certain provisions were met.²¹ The amendment was not adopted; however, a working group was established to evaluate the use of seclusion and report back to the legislature. The legislative Seclusion Working Group met regularly from August 2025 to January 2026 and must provide a report to the legislature by January 30, 2026.²² MDLC participated in the Seclusion Working Group and advocated to adopt MDE’s recommendation to eliminate the use of seclusion by September 1, 2026, or at the least, to maintain the current statutory prohibition on the use of seclusion from birth to grade 3 and not “roll back” current protections for children with disabilities.

¹⁸ *Id.* at 6.

¹⁹ *Id.* at 6.

²⁰ *Id.* at 6. Minn. Stat. § 125A.0942.

²¹ At the time of Senator Seeberger’s floor amendment in May 2025 to allow seclusion up to sixth grade with IEP team approval, the prohibition on using seclusion for children up to third grade had been effective for less than one school year. Starting on September 1, 2024, school staff were prohibited from using seclusion on children ages birth to third grade under Minn. Stat. § 125A.0942, subd. 4(11).

²² <https://www.lcc.mn.gov/seclusion/08132025/enabling-legislation>.

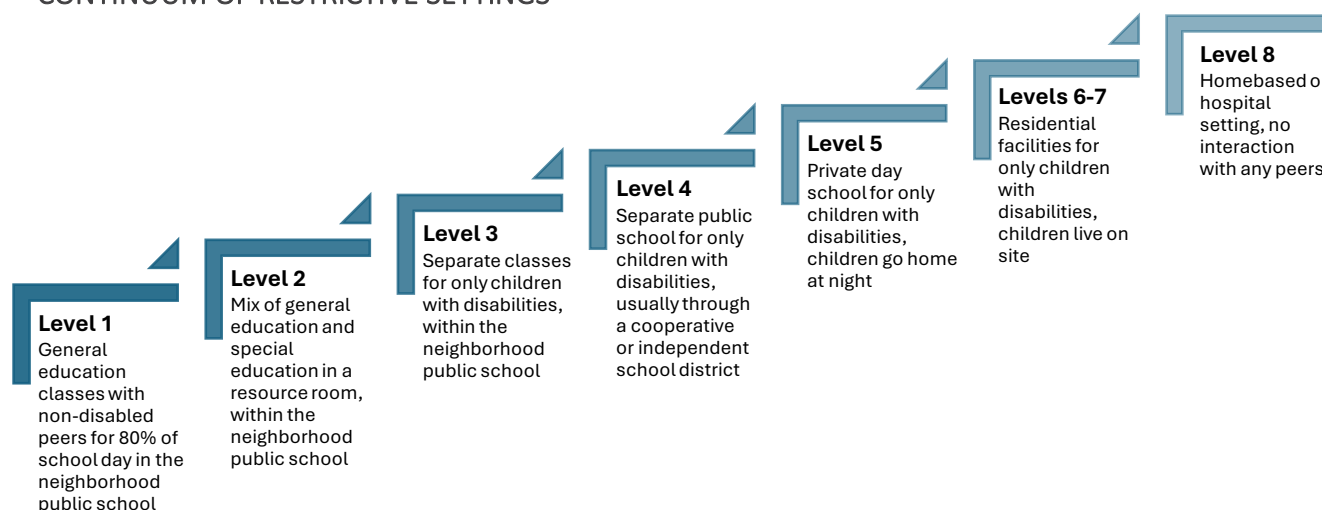
INTRODUCTION

Who uses seclusion in Minnesota?

Although any school can register a seclusion room, the majority of seclusion rooms in Minnesota are located in what are considered Level 3 and Level 4 restrictive facilities for children with disabilities.

Federal law outlines eight levels that describe how restrictive the setting is for a child with disabilities. Under federal law, children with disabilities must be educated in their least restrictive environment (“LRE”).²³ This means that children with disabilities should be educated with their nondisabled peers in a general education setting.²⁴ They should only be moved to a more restrictive setting when the nature and severity of the disability requires special classes.²⁵ These environments are known as “levels,” with each level (Level 1-8) becoming more restrictive.²⁶

CONTINUUM OF RESTRICTIVE SETTINGS²⁷



The majority of seclusion rooms are located in Level 3 and Level 4 settings.

²³ 34 CFR 300.114 (a)(2).

²⁴ 34 CFR 300.114 (a)(2).

²⁵ 34 CFR 300.114 (a)(2).

²⁶ The Arc Minnesota, Arc Guide to Least Restrictive Environment in Special Education and Federal Settings, available at: [Arc-Guide-to-Least-Restrictive-Environment-in-Special-Education-and-Federal-Setting.pdf](https://www.arc.org/files/documents/2016/09/20/arc-guide-to-least-restrictive-environment-in-special-education-and-federal-settings.pdf)

²⁷ Minnesota Department of Education, Least Restrictive Environment Checklist, available at: <https://www.bing.com/ck/a?!&p=c9447799d2b38fb387008f12a8c9f345b4d32bbd33ae4cf82dacc64dbc4e7d2fJmItdHM9MTc2Nzc0NDAwMA&ptn=3&ver=2&hsh=4&fclid=034dc4f2-f401-637f-0e8c-d085f59262b4&psq=Minnesota+Department+of+Education%2c+Least+Restrictive+Environment+Checklist&u=a1aHR0cHM6Ly9lZHVjYXRpb24ubW4uZ292L21kZXByb2QvaWRjcGxnP0lkY1NlcnZpY2U9R0VUX0ZJTEUmZERvY05hbWU9UfJPRDA0NTg5NiZSZXZpc2l2bWVjZGVlbk1ldGhvZD1sYXRlc3RSZWxlYXNlZCZSZW5kaXRpb249cHJpbWFFyeQ.>

INTRODUCTION

The least restrictive setting is a Level 1 setting: the child with disabilities spends the vast majority of their time in the general education classroom with nondisabled peers in their typical neighborhood school. As the levels increase from 2 to 8, students with disabilities spend less time in a general education setting and less time with their nondisabled peers. On the other end of the spectrum, the most restrictive setting is a Level 8 setting: the child is educated 100% of their time in a homebound or home-based setting and does not attend any school facility or spend any time with any peers.

The majority of seclusion rooms are located in Level 3 and Level 4 settings. In a Level 3 setting, the child with disabilities remains in their typical neighborhood school building for the school day but receives education in a separate class for students with disabilities more than 60% of the day. In a Level 4 setting, the child with disabilities is removed from their typical neighborhood school and is placed in a separate public school facility with a specially designed educational program that only serves children with disabilities. Level 4 settings only serve children with disabilities.

In the 2024-25 school year, fifty school districts registered a seclusion room with MDE.²⁸ See *Appendix A: MDE's List of Registered Seclusion Rooms*. There are 328 school districts in Minnesota, meaning approximately fifteen percent (15%) of school districts have registered seclusion rooms. Within those fifty school districts with registered rooms, there are 194 registered seclusion rooms located within 100 school buildings.

Of those fifty school districts with registered rooms, twenty-four (24) districts only have one registered seclusion room for the entire district (for example, Anoka-Hennepin School District has one registered seclusion room at River Trails Learning Center, their Level 4 setting).

Of those fifty school districts with registered rooms, six districts have ten or more (10+) seclusion rooms across the district (for example, Brainerd School District has twelve registered seclusion rooms across seven school buildings).

Forty percent (40%) of the state's registered seclusion rooms (79 of 194) are located in four school districts:

- **Intermediate School District 917**
- **Region 6 and 8-SW/WC Service Cooperative**
- **Independent School District 525 Rochester Public Schools**
- **Independent School District 196 Rosemount-Apple Valley-Eagan**

²⁸ Seclusion can occur in any room from which a child is barred egress; however, if a school district has a designated seclusion room with a lock, it must be registered with MDE. For example, two schools reported using seclusion in 2024-25 school year, but they do not have registered seclusion rooms: PACT Charter and Intermediate Metro District 288.

INTRODUCTION

School districts are required by law to report to MDE when they use seclusion. The number of school districts using seclusion has consistently decreased over the last four years:

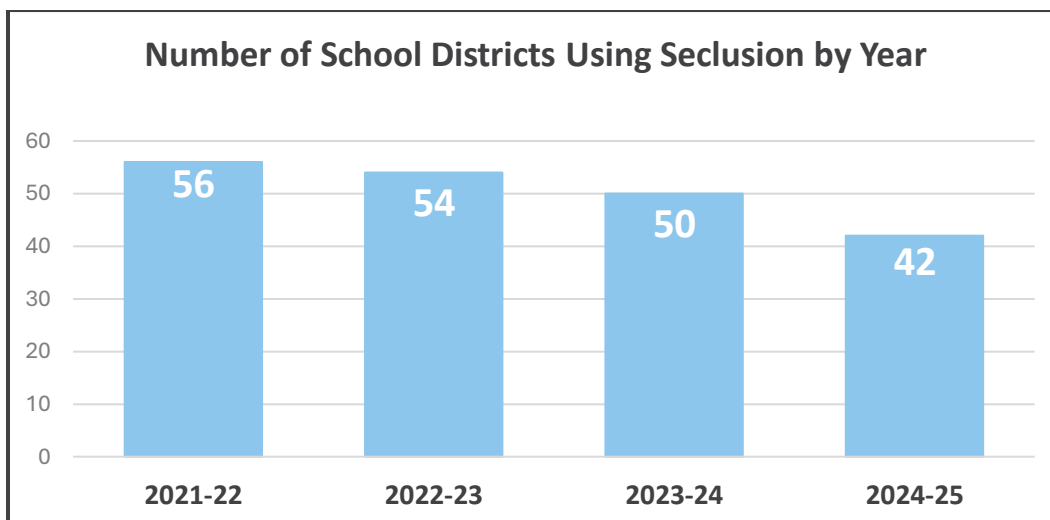


Figure 1 graphically demonstrates these numbers: 2021-22 school year: 56 school districts used seclusion; 2022-23 school year: 54 school districts used seclusion; 2023-24 school year: 50 school districts used seclusion; 2024-25 school year: 42 school districts used seclusion.

Relatedly, school districts have reported using fewer incidents of seclusion over the last four years:

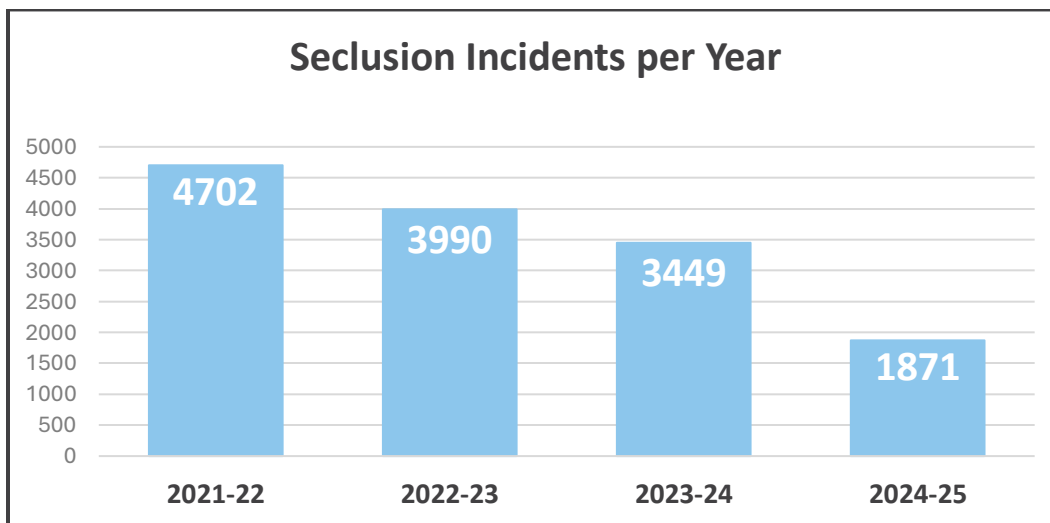


Figure 2 chart graphically demonstrates these numbers: 2021-22 school year: 4702 seclusion incidents; 2022-23 school year: 3990 seclusion incidents; 2023-24 school year: 3449 seclusion incidents; 2024-25 school year: 1871 seclusion incidents.

The decreasing numbers indicate that the goal of moving away from use of seclusion in schools along with change in law is having a real impact on Minnesota students.

INTRODUCTION

What are the laws on seclusion rooms in Minnesota?

There are no current federal laws that explicitly address seclusion, although the U.S. Department of Education and U.S. Department of Justice have prohibited the use of seclusion in certain schools under violations of federal civil rights laws such as Section 504 of the Rehabilitation Act.²⁹ In December 2025, a bipartisan group of lawmakers in the U.S. Congress, including ranking members of the House Committee on Education and Workforce and the Senate Health, Education, Labor and Pensions Committee, introduced the *Keeping All Students Safe Act* (H.B. 6617) to prohibit the use of seclusion nationwide.³⁰

Each state has different state laws related to the use of seclusion in schools. Eleven states prohibit the use of any seclusion for any aged child in public schools (Alabama, Florida, Georgia, Hawaii, Maryland, Massachusetts, Nevada, New York, Pennsylvania, Rhode Island, and Texas).³¹ For example, Hawaii Statute 302A-1141.3 states: "The use of seclusion, chemical restraint, or mechanical restraint shall be prohibited in public schools regardless of any consent of the student, parents, or guardians."³²

In Minnesota, Minnesota Statute 125A.0942 addresses restrictive procedures (physical holding or seclusion) in schools. In summary, schools that intend to use seclusion must:

- have a public plan that describes how seclusion will be used with children with disabilities;
- ensure that only appropriately licensed staff use seclusion;
- train staff who will use seclusion;
- only use seclusion in emergencies, not for discipline;
- appropriately notify the parent when seclusion is used;
- convene a team meeting when seclusion is used twice within 30 calendar days or when a pattern of using seclusion emerges and the child's plan does not include the use of seclusion.

Starting on September 1, 2024, school staff were prohibited from using seclusion on children ages birth to third grade under Minnesota Statute 125A.0942, subd. 4(11). Seclusion is still permissible for children after third grade.

²⁹ See, e.g., U.S. Department of Justice, *Enforcement Updates*, available at: <https://www.justice.gov/crt/seclusion-enforcement-recent-investigations>. Last visited December 15, 2025.

³⁰ [Text - H.R.6617 - 119th Congress \(2025-2026\): Keeping All Students Safe Act | Congress.gov | Library of Congress](#). *Fact Sheet: Keeping All Students Safe Act: Protecting All Students from the Dangers of Seclusion and Restraint*, House Committee on Education and Workforce Committee, December 12, 2025, available at: https://democrats-edworkforce.house.gov/imo/media/doc/keeping_all_students_safe_act_of_2025_fact_sheet.pdf.

³¹ Ala. Admin. Code R. 290-3-1-.02(1)(f) (2025); Fla. Stat. § 1003.573 (2023); Georgia State Board of Education 160-5-1-.35 (2023); Haw. Rev. Stat. § 302A-1141.3 (2024); Md. Code Regs. 13A.08.04.05(B)(1) (2023); Mass. DESE Regulations 603 CMR 46.00 (2016); Nev. Rev. Stat. § 388.473 (2015); N.Y. Comp. Codes R. & Regs. Tit. 8 § 19.5 (2023); 22 Pa. Code § 14.133 (2008); 200-R.I. Code R. 20-30-2.2 (2018); Tex. Educ. Code Ann. § 37.0021 (2025).

³² Haw. Rev. Stat. Ann. § 302A-1141.3 (2024).

METHODOLOGY

Method for Seclusion Room Photography Project

Under Minnesota Statute 125A.0942, subd. 3(a)(7)(ii), schools must register seclusion rooms with the Minnesota Department of Education (MDE). In early summer 2025, MDLC requested information about seclusion under the Minnesota Government Data Practices Act.³³ MDE provided a list of registered seclusion rooms that school districts registered for the 2024-25 school year, and a list of school districts that reported using seclusion in the 2024-25 school year.

According to these MDE records, fifty (50) school districts registered 194 seclusion rooms across the state in the 2024-25 school year. Those 194 seclusion rooms are located within 100 school buildings. *See Appendix A: MDE's List of Registered Seclusion Rooms.*

Registered seclusion rooms are geographically located reflective of Minnesotan population density (i.e., there are seclusion rooms densely located in the Twin Cities Metro area and some scattered throughout Greater Minnesota). *See Appendix C: Map of Registered Seclusion Rooms.* Level 4 settings have, per capita, more seclusion rooms than any other setting. However, many seclusion rooms are located in elementary schools that serve children in Levels 1-3 (more general education settings).

Of the fifty (50) school districts with registered seclusion rooms (i.e., a physical room exists), twenty-two (22) of those school districts reported *using* seclusion with children with disabilities in the 2024-25 school year (i.e., the event of seclusion occurred). MDE does not collect data on which school buildings *within* those school districts used seclusion, so for a district that has multiple seclusion rooms in multiple school buildings, there is no public information on which school buildings or which school staff used seclusion.

According to MDE records, two schools reported using seclusion in the 2024-25 school year, but they did not have registered seclusion rooms: PACT Charter School and Intermediate Metro District 288. *See Appendix A: MDE's List of Registered Seclusion Rooms.* Seclusion can occur in any room in which the child is alone and not free to leave.

At least two schools that had registered seclusion rooms in the 2024-25 school year only serve children too young for seclusion under the current law³⁴: Paul Bunyan Center Early Childhood Center and Sunnyside Elementary. MDLC staff contacted school administrators at those sites, who both confirmed this was a mistake and that they inactivated or de-registered their seclusion rooms with MDE for the 2025-26 school year.

³³ Minn. Stat. § 13.01 *et. seq.*

³⁴ Starting on September 1, 2024, the use of seclusion on children from birth through grade 3 is prohibited under Minn. Stat. § 125A.0942, subd. 4(11).

METHODOLOGY

Many, but not all, Level 4 settings in Minnesota have registered seclusion rooms. Level 4 settings are separate public school facilities with a specially designed educational program that only serves children with disabilities. Children in Level 4 settings tend to have disabilities that require more support and services. Of the Level 4 settings, there is a wide range of how many registered seclusion rooms are available per child. To illustrate, MDLC compared a handful of Level 4 settings located in Twin Cities Metro area, all within approximately twenty miles of each other:

- Dakota Ridge School in Independent School District 196, located in Apple Valley, MN, serves 101 students and has 35 registered seclusion rooms (one seclusion room per 2.8 students).³⁵
- Pankalo Education Center in Intermediate School District 916, located in Lake Elmo, MN, serves 97 students and has 1 registered seclusion room (one seclusion room per 97 students).³⁶
- SUN at Alliance Education Center in Intermediate School District 917, located in Inver Grove Heights, MN, serves 94 students and has 7 registered seclusion rooms (one seclusion room per 13.4 students).³⁷
- North Education Center in Intermediate School District 287, located in Minneapolis, MN, serves 37 students and has 0 registered seclusion rooms.³⁸ Intermediate School District 287 does not use any seclusion.

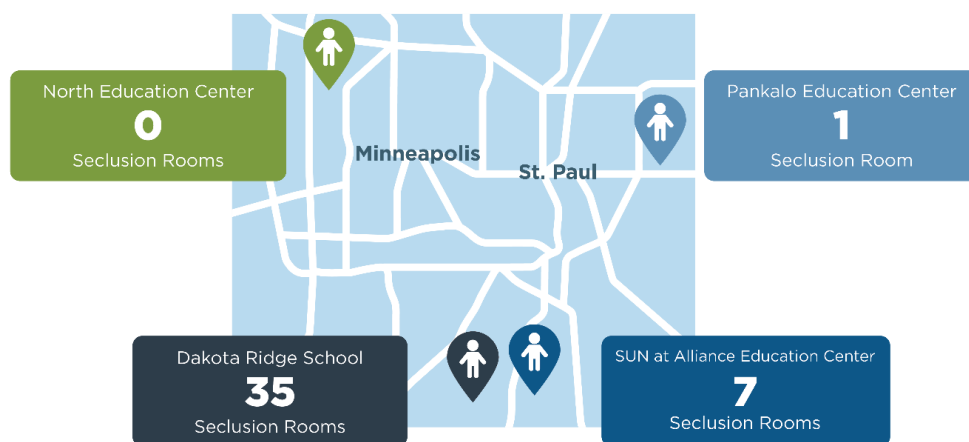


Figure 3: A map of Minneapolis and St. Paul with 4 location pins each depicting a child. Next to each child is a text box. The text boxes read: North Education Center - 0 Seclusion Rooms; Pankalo Education Center - 1 Seclusion Room; Dakota Ridge School - 35 Seclusion rooms; SUN at Alliance Education Center – 7 seclusion rooms.

³⁵ https://rc.education.mn.gov/#demographics/orgId--10196100000_year--2025_p--1.

³⁶ https://rc.education.mn.gov/#mySchool/orgId--60916058000_p--3.

³⁷ https://rc.education.mn.gov/#mySchool/orgId--60917400000_p--3.

³⁸ https://rc.education.mn.gov/#demographics/orgId--60287772000_year--2025_p--1.

METHODOLOGY

This data illustrates the localized and random nature of seclusion facilities in Minnesota schools serving similar populations of students with disabilities. If a student with Autism Spectrum Disorder who needs a Level 4 setting lives in Apple Valley and goes to Dakota Ridge School, they attend a building with one seclusion room for every 2.8 students. There is a seclusion room around every corner; their odds of being secluded or watching a friend be secluded are high. If the exact same student with the exact same needs happens to live a few miles north and attends North Education Center, they attend a building with no seclusion rooms at all and a school district that does not use seclusion.

In late summer 2025, MDLC staff picked a cross section of seclusion rooms across the state to monitor. With limited staff and resources, MDLC used the following factors to select a representative cross section of the seclusion rooms in Minnesota:

- Geographic location (noting that registered seclusion rooms followed population density in the state, with most registered rooms located in the Twin Cities Metro area and other rooms scattered throughout Greater Minnesota)³⁹
- Total number of students served by the school district
- Demographic information of the students served in the school building (race/ethnicity, English learner, free/reduced price meals, homeless)⁴⁰
- Whether the seclusion room is located in an intermediate school district or cooperative (one school district that serves multiple member districts), or an independent school district

In fall 2025, MDLC staff members toured and photographed eighty (80) registered seclusion rooms in twenty-six (26) school buildings across the state. MDLC provided at least one month's advance notice to all schools, and all schools confirmed the date and time. In all school districts, school administrators met MDLC representatives and toured the facilities with them. MDLC did not observe any children in active seclusion; however, MDLC staff members did observe a few registered seclusion rooms with students inside the rooms (door open) sleeping or working.

After completing these monitoring site visits, MDLC staff reviewed all information gathered including photographs, videos, and other material. After conducting an extensive review and analysis of the information gathered, MDLC has made four key findings in this report.

³⁹ See Appendix C: Map of Registered Seclusion Rooms in 2024-25 School Year.

⁴⁰ Demographic information was accessed from the Minnesota Report Card: <https://rc.education.mn.gov/>

KEY FINDINGS 1

Concrete floors with hard or padded walls are typical for school seclusion rooms. The majority of seclusion rooms have beige cinder block walls, although newly constructed rooms tend to have padded walls. Padded walls can be used for mitigation of self-injurious behavior when a child is locked inside the seclusion room. Most seclusion room floors are non-carpeted, such as concrete slabs, for ease of cleaning up bodily fluids.

Of the eighty seclusion rooms observed, approximately one third (1/3) of rooms were padded and two thirds (2/3) of rooms had hard, usually cinder block, walls. Newly constructed buildings were more likely to have padded rooms. Protective wall padding can be used for mitigation of self-harm when a child is locked in the seclusion room, mitigating head injuries when children slam their bodies into walls. Protective wall padding may also add a soft texture and sound dampener that some children find comforting, or a potential manipulative that some children may try to remove from the walls with their hands.

Most seclusion room walls were beige or white, without visuals or decoration. Most seclusion room floors were non-carpeted (concrete or tile), and several seclusion rooms had drains installed in the center of the floor. These design features make cleaning bodily fluids easier for school staff, such as when a child urinates, defecates, or vomits in the seclusion room. Carpeted floors may also add a soft texture and sound dampener that some children find comforting, or a potential manipulative that some children may try to remove from the floor with their hands.

KEY FINDINGS 1 • Walls & Floors



Image 1: Adult man who is 5 feet 11 inches tall sits in a registered seclusion room with cinder block walls and unfinished concrete floor in Cedar School - Eagan, MN



Image 2: Registered seclusion room with unfinished mottled concrete floor of seclusion room in Hoover Elementary School – Rochester, MN

KEY FINDINGS 1 • Walls & Floors



Image 3: Registered seclusion room with cinder block walls and metal window frames with chipped paint in Isanti Intermediate School - Isanti, MN

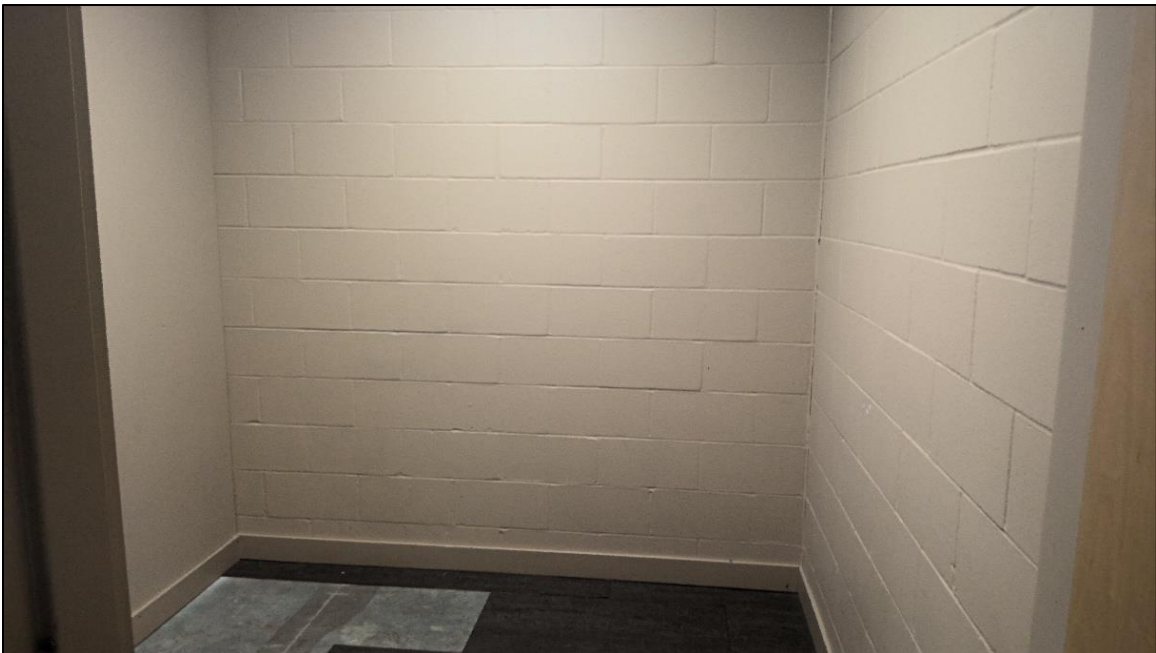


Image 4: Registered seclusion room with cinder block walls with partially concrete and partially carpeted floor in Cedar School - Eagan, MN

KEY FINDINGS 1 • Walls & Floors



Image 5: Registered seclusion Room with tiled walls and tiled floor in Brookside Academy - Cambridge, MN



Video 1: Registered seclusion room with tiled walls and floor in Brookside Academy – Isanti, MN

Watch: <https://www.youtube.com/watch?v=yW86v5mAHZA>

KEY FINDINGS 1 • Walls & Floors

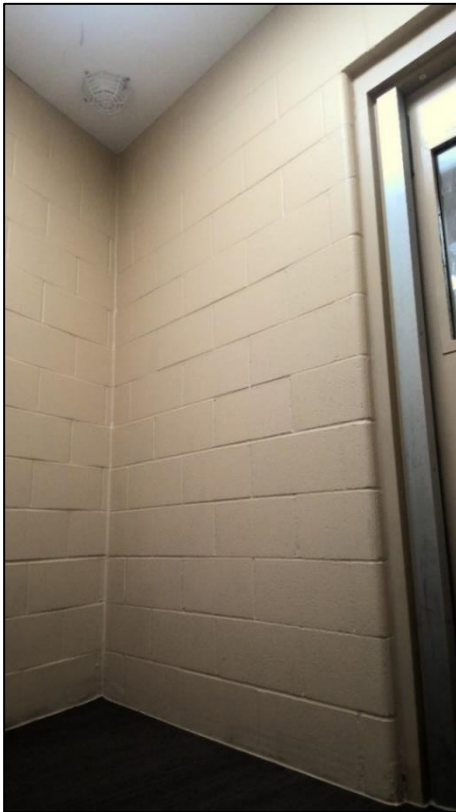


Image 6: Registered seclusion room with cinder block walls with carpeted floor in Alliance Education Center – Rosemount, MN



Image 7: Registered seclusion room with plaster walls and uncarpeted floor in Dakota Ridge School – Apple Valley, MN



Video 2: Seclusion room in compliance with physical requirements under law. Dakota Ridge School – Apple Valley, MN. Watch: <https://www.youtube.com/watch?v=3sz5S3PEjto>

KEY FINDINGS 1 • Walls & Floors



Image 8: Adult man who is 5 feet 11 inches tall sits in a registered seclusion room with padded walls with non-carpeted floor in Cedar School – Eagan, MN



Image 9: Adult man who is 5 feet 11 inches tall standing with arms outstretched in a registered seclusion room with padded walls with non-carpeted floor in Cedar School – Eagan, MN

KEY FINDINGS 1 • Walls & Floors



Image 10: Registered seclusion room with padded walls with non-carpeted floor in Bemidji High School – Bemidji, MN



Image 11: Registered seclusion room with padded walls with non-carpeted floor in Bemidji Middle School – Bemidji, MN

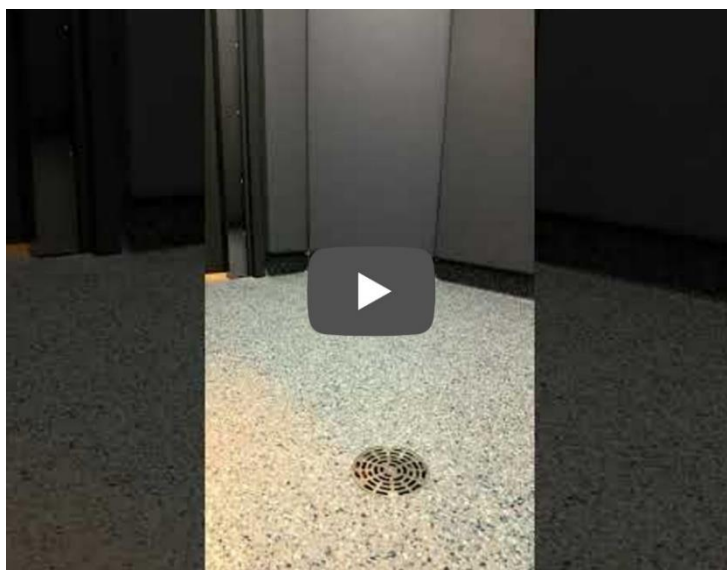
KEY FINDINGS 1 • Walls & Floors



Image 12: Photograph taken from child's view while inside a registered seclusion room, looking out to observation window/closed door. An adult man stands outside the closed door looking in. Southwest West Central Service Cooperative - Education Learning Center - New London, MN



Image 13: Registered seclusion room with padded walls with non-carpeted floor. Southwest West Central Service Cooperative Education Learning Center - New London, MN



Video 3: Registered seclusion room with padded walls and hard surface floor with floor drain. SWWC Education Learning Center - New London, MN. Watch: <https://www.youtube.com/shorts/yMOJYTbd00Q>

KEY FINDINGS 2

Seclusion rooms and calming or sensory rooms are very different from seclusion rooms in use and environment. Students can generally use calming or sensory rooms at their will, as opposed to being restricted or physically placed in a seclusion room by an adult. Calming or sensory rooms are generally larger than seclusion rooms, have various colored or soft lighting to create a calmer environment, and contain sensory tools such as bean bags, hammocks, foam mats, punching bags, and other occupational therapy equipment. All schools that had seclusion rooms also had calming or sensory rooms.

The nomenclature of “calming rooms,” “sensory rooms,” and “seclusion rooms” can be confusing. Many schools will name their seclusion room as a “calming room” or similar. But there are key differences between a registered seclusion room and a calming room.

Calming rooms or sensory rooms, which students can generally use at their will, are larger than seclusion rooms. Calming rooms or sensory rooms have various colored or soft lighting to create a calmer environment, and contain sensory tools such as bean bags, hammocks, foam mats, punching bags, and other occupational therapy equipment. Adults generally stay in the calming room with the child, and the child can leave when they determine they are ready to leave the calming room.

KEY FINDINGS 2 · Calming & Sensory Rooms

MDLC’s monitoring revealed that all school sites that had registered seclusion rooms also had *true* calming rooms or sensory rooms. MDLC found stark differences between calming rooms and seclusion rooms:

Seclusion Room	Calming Room
Small in size: 6 feet by 5 feet, generally the size of a small closet	Large in size: Typically the size of a classroom
Empty walls painted beige or white, without any decoration or color	Colorful walls painted vibrant primary colors or calming pastels, or decorated with fun visuals
Overhead, bright, institutional fluorescent lighting: Lights are either on or off	Soft, dimmed, or colored lights or natural light from outdoors: One room had soft lights that cycled through the colors of the rainbow (red for ten seconds, then orange for ten seconds, etc.); other rooms had soft overhead lighting created with transparent sheets hung over fluorescent lights or windows to the outdoors
No tools or objects ⁴¹	Chockful of sensory tools and calming objects: bean bags, hammocks, foam mats, punching bags, and other occupational therapy equipment
No music	Calming music, usually with choices that the child can select
Student alone	Student with an adult, who stays with the child to process their behavior

Although some seclusion rooms were confusingly labeled “calming rooms,” all school sites that had registered seclusion rooms also had *true* calming rooms for de-escalation and emotional regulation.

⁴¹ The exception was if the room was out of compliance with the law and included objects like a desk (See Key Finding #4).

KEY FINDINGS 2 · Calming & Sensory Rooms

Studies have shown that using calming or sensory rooms decrease the use of seclusion.⁴² Calming rooms encourage students to utilize tools such as swings or weighted blankets, music, lighting, and environmental supports while they process their emotional and mental regulation alongside trained adults. Children with autism who have access to calming rooms and are permitted to select changes in their environment, such as lighting or sounds, show improvements in attention, social interactions, meeting their individualized goals, mood and classroom performance, and reductions in anxiety and challenging behaviors.⁴³ In contrast, children subjected to seclusion in seclusion rooms do not have choices or autonomy in going to the room, leaving the room, or any environmental controls like lighting, music, or therapeutic tools.

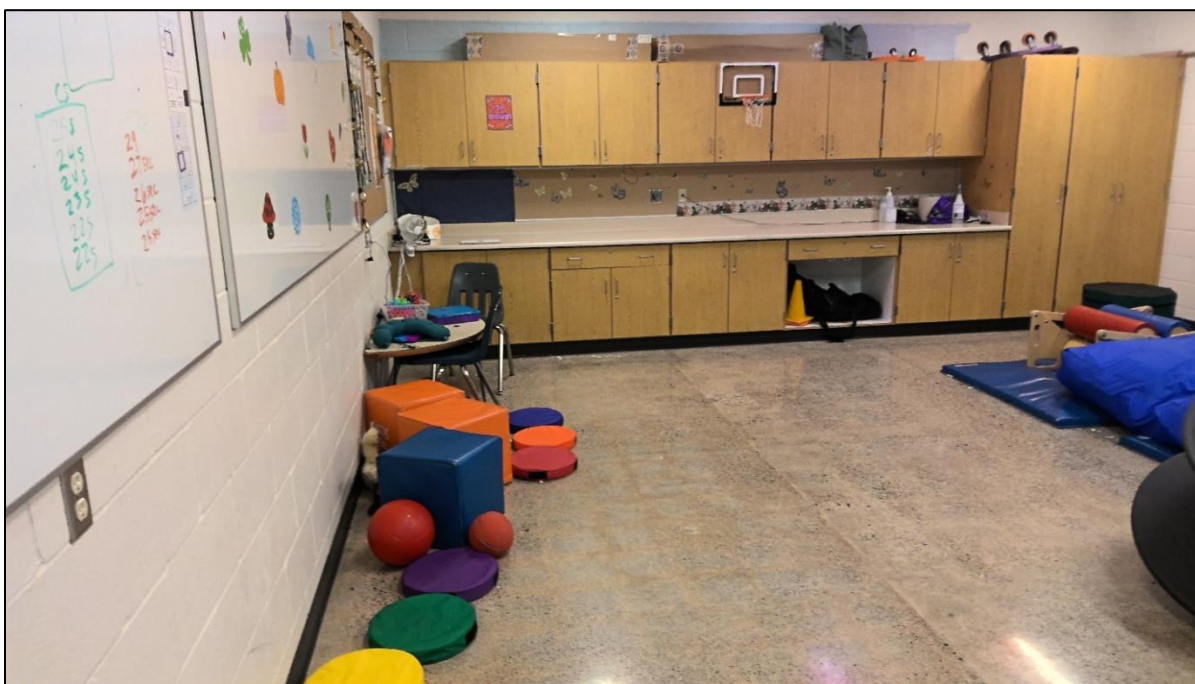


Image 14: Calming sensory room with therapeutic tools such as brightly colored cushions, balls, mats and toys. This is not a registered seclusion room. River Trail Learning Center – Coon Rapids, MN

⁴² Oostermeijer S, Brasier C, Harvey C, Hamilton B, Roper C, Martel A, Fletcher J, Brophy L. Design features that reduce the use of seclusion and restraint in mental health facilities: a rapid systematic review. *BMJ Open*. 2021 Jul 7;11(7):e046647. doi: 10.1136/bmjopen-2020-046647. PMID: 34233981; PMCID: PMC8264870.

⁴³ Unwin KL, Powell G, Jones CR. The use of Multi-Sensory Environments with autistic children: Exploring the effect of having control of sensory changes. *Autism*. 2022 Aug;26(6):1379-1394. doi: 10.1177/13623613211050176. Epub 2021 Oct 24. PMID: 34693744; PMCID: PMC9340127.

KEY FINDINGS 2 · Calming & Sensory Rooms

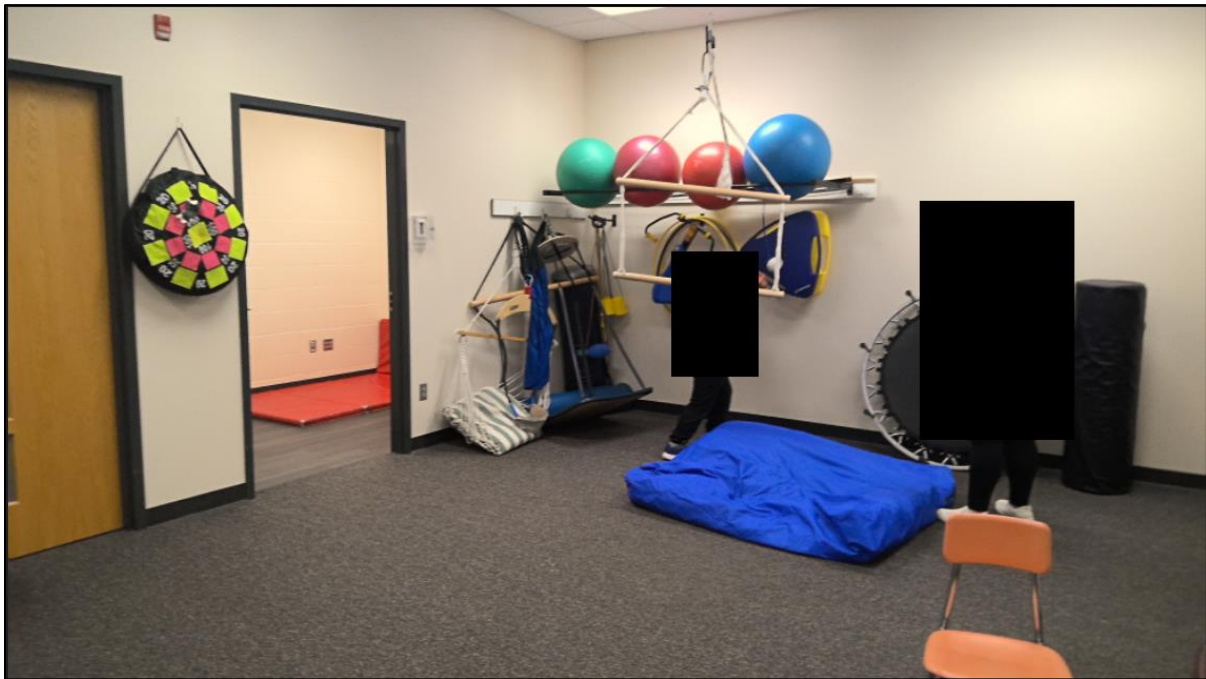


Image 15: A young child and adult staff member utilize the calming room with therapeutic tools, including yoga balls, swing, trampoline, and large floor bean bag. Northwinds Elementary School – Buffalo, MN.

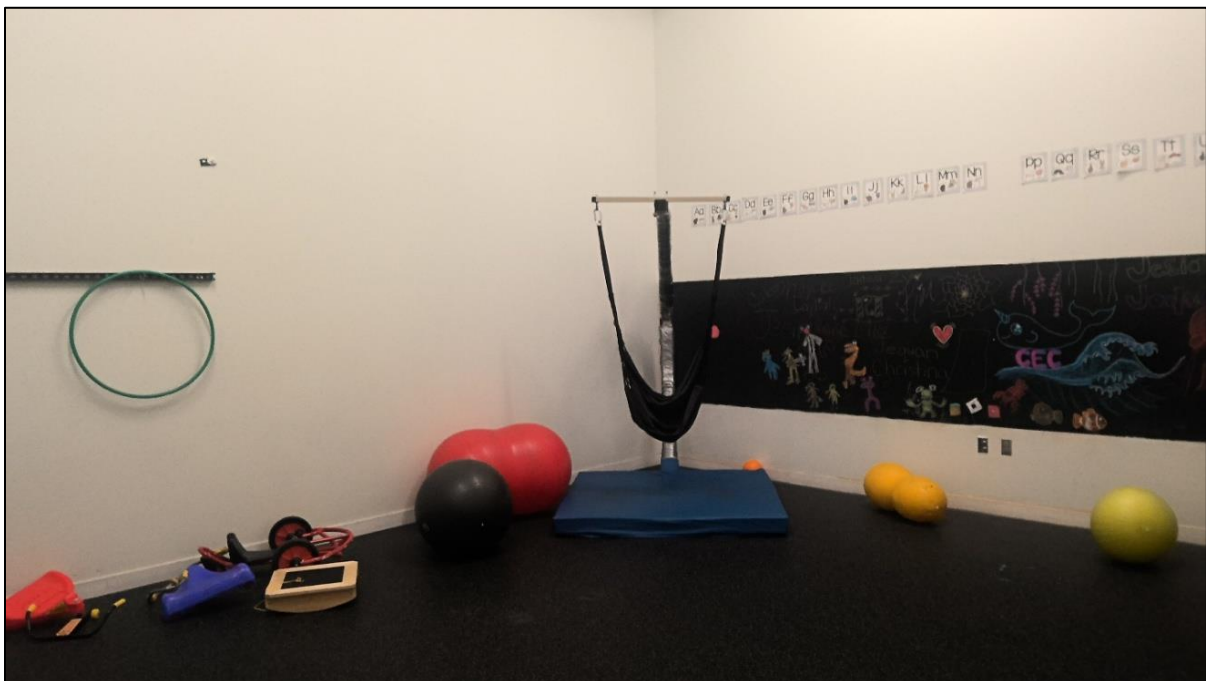


Image 16: A sensory room with colorful chalkboard wall and therapeutic tools such as yoga balls, swing, hula hoop, and balancing tools. Concord Education Center – Inver Grove Heights, MN

KEY FINDINGS 2 · Calming & Sensory Rooms



Image 17: A calming room with soft blue lighting created by transparent fabric hung over overhead lights. The room includes therapeutic tools such as a large rocking chair and yoga balls. River Trail Learning Center – Coon Rapids, MN



Image 18: A calming room with a plant and books, with bright natural light, and half-wall that allows an adult viewer to give a child privacy in the room but never being separated by a full wall. Bemidji High School – Bemidji, MN

KEY FINDINGS 2 · Calming & Sensory Rooms



Image 19: Sensory Room 3, filled with floor mats, cushions, a doll house, and cheerful wall art. Concord Education Center – Inver Grove Heights, MN

KEY FINDINGS 3

There is no accurate, current list of school districts that have registered seclusion rooms currently available. Many school districts that have ended the practice of using seclusion rooms are inaccurately or mistakenly left on MDE's list. Other school districts that registered seclusion rooms with MDE use them as storage closets or independent workspaces which does not comply with Minnesota law.

Identifying which schools have actively registered seclusion rooms is difficult under current Minnesota statutes. Per Minnesota Statute 125A.0942, subd. 3(7)(ii), schools are required to annually register their seclusion rooms with the Minnesota Department of Education (MDE). That list of registered seclusion rooms is not published anywhere publicly, although MDE provided the list to MDLC under the Minnesota Government Data Practices Act to MDLC.⁴⁴ According to MDE's list of registered seclusion rooms, 50 school districts in Minnesota registered seclusion rooms in the 2024-25 school year.

However, when MDLC notified five school districts that MDLC would monitor their registered seclusion room, the school district informed MDLC that they no longer used seclusion as a school practice and had forgotten to "de-register" their room with MDE. Each district noted it was an oversight or human error that the seclusion room continued to be registered after the school had stopped using seclusion. Those districts presented proof to MDLC that they had corrected their status with MDE and "de-registered" the former seclusion room.

Even when a school district confirmed they had a registered seclusion room on MDE's list, during in-person visits MDLC found that many registered seclusion rooms were being used as storage closets or independent workspaces.⁴⁵

⁴⁴ Minn. Stat. § 13.01 *et. seq.*

⁴⁵ Interestingly, when MDLC staff asked artificial intelligence (AI) to generate alternative text for photos of seclusion rooms, many times AI stated that the photo was of a utility or storage closet.

KEY FINDINGS 3 • Inaccurate Registration



Image 20: Registered seclusion room, labeled as “calming room,” with sign reading “OUT OF ORDER. DO NOT USE.” SWWC Education Learning Center – Cosmos, MN



Image 21: Registered seclusion room used as storage closet for desks. SWWC Education Learning Center – Cosmos, MN

KEY FINDINGS 3 • Inaccurate Registration

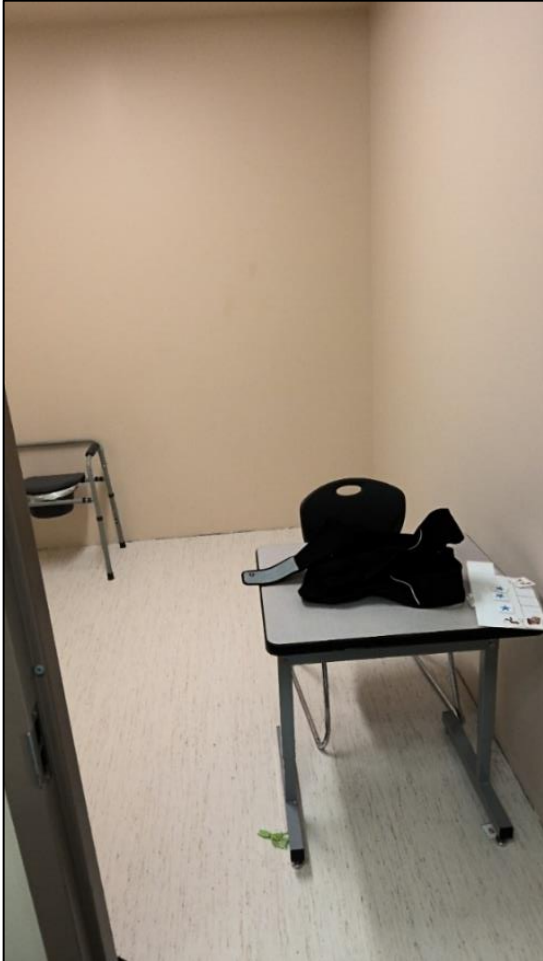


Image 22: Registered seclusion room being used as an independent workspace or study space. In addition, the room includes objects that a child may use to injure themselves or others, including a desk, chair, and portable toilet. Seclusion room is not in compliance with Minnesota law. School staff stated the objects inside that will be removed in emergencies when students are secluded inside the room. Dakota Ridge School – Apple Valley, MN

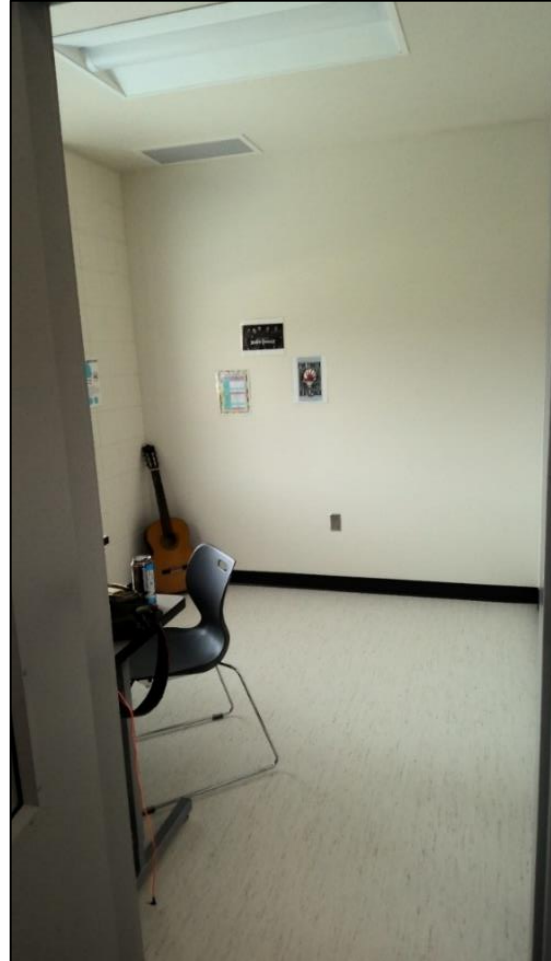


Image 23: Registered seclusion room being used as an independent workspace or study space. In addition, the registered seclusion room includes objects that a child may use to injure themselves or others, including a desk, chair, guitar, and wall postings. Seclusion room is not in compliance with Minnesota law. School staff stated the objects inside that will be removed in emergencies when students are secluded inside the room. Dakota Ridge School – Apple Valley, MN.

KEY FINDINGS 3 • Inaccurate Registration



Video 4: Registered seclusion room with desk and guitar. Dakota Ridge School – Apple Valley, MN
Watch: <https://www.youtube.com/watch?v=-DW49l3Txwc>

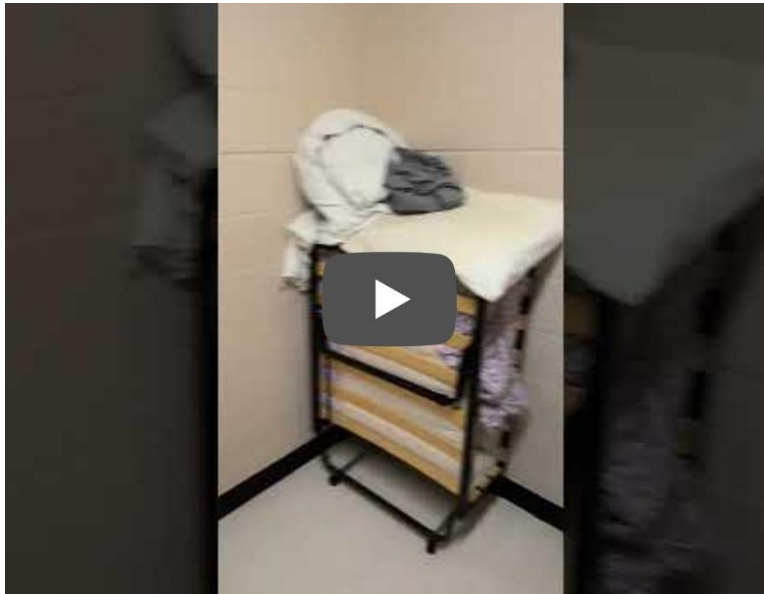


Video 5: Seclusion room not in compliance with physical requirements under law. Registered seclusion room with multiple manipulatives, including an installed hammock, portable toilet, desk, and mat, which would have to be removed in an “emergency.” Dakota Ridge School – Apple Valley, MN
Watch: <https://www.youtube.com/watch?v=vCGoKnnErbo>

KEY FINDINGS 3 • Inaccurate Registration



Video 6: Seclusion room not in compliance with physical requirements under law. Dakota Ridge School – Apple Valley, MN. Watch: <https://www.youtube.com/watch?v=nETydw9Dwk0>



Video 7: Seclusion room not in compliance with physical requirements under law. Registered seclusion room with multiple manipulatives, including bed, to be removed in emergency. Dakota Ridge School – Apple Valley, MN Watch: <https://www.youtube.com/watch?v=9V8LxlmMN0>

KEY FINDINGS 4

Most seclusion rooms were in compliance with the architectural requirements mandated by Minnesota statute. Those that were not in compliance contained objects that a child may use to injure themselves or others, or the rooms were in poor condition, lacked lighting, not ventilated, not adequately heated, appeared to have water damage, and/or contained chipped paint surfaces.

Seclusion rooms in Minnesota schools must meet specific architectural requirements, set forth in Minnesota Statute 125A.0942 subd. 3(a)(6). Seclusion rooms must be at least 6 feet by 5 feet, have an observation window for staff to observe children locked inside the room, and have tamperproof fixtures and no objects that a child could use to injure themselves or others.⁴⁶

Most of the seclusion rooms that MDLC monitored were in compliance with these physical, architectural requirements. The most common reason for a room to be out of compliance was because there were objects in the room that a child may use to injure the child or others, such as furniture in the room. A notable number of rooms were in poor condition, lacked lighting, not ventilated, or not adequately heated.

(i) Rooms must be at least six feet by five feet.

All seclusion rooms appeared to meet the minimum statutory size requirements of six feet by five feet, or the size of a small closet.⁴⁷ When an adult stood in the center of the room and opened their arms, the wingspan usually hit the opposite walls of the seclusion room. The largest seclusion rooms MDLC monitored were roughly twice the minimum statutory size.

⁴⁶ Minn. Stat. § 125A.094, subd. 3(a)(6) and (7) states: “the room used for seclusion must:

- (i) be at least six feet by five feet;
 - (ii) be well lit, well ventilated, adequately heated, and clean;
 - (iii) have a window that allows staff to directly observe a child in seclusion;
 - (iv) have tamperproof fixtures, electrical switches located immediately outside the door, and secure ceilings;
 - (v) have doors that open out and are unlocked, locked with keyless locks that have immediate release mechanisms, or locked with locks that have immediate release mechanisms connected with a fire and emergency system; and
 - (vi) not contain objects that a child may use to injure the child or others; and
- (7) before using a room for seclusion, a school must:
- (i) receive written notice from local authorities that the room and the locking mechanisms comply with applicable building, fire, and safety codes; and
 - (ii) register the room with the commissioner, who may view that room.

⁴⁷ MDLC did not measure each seclusion room

KEY FINDINGS 4 • Building Requirements

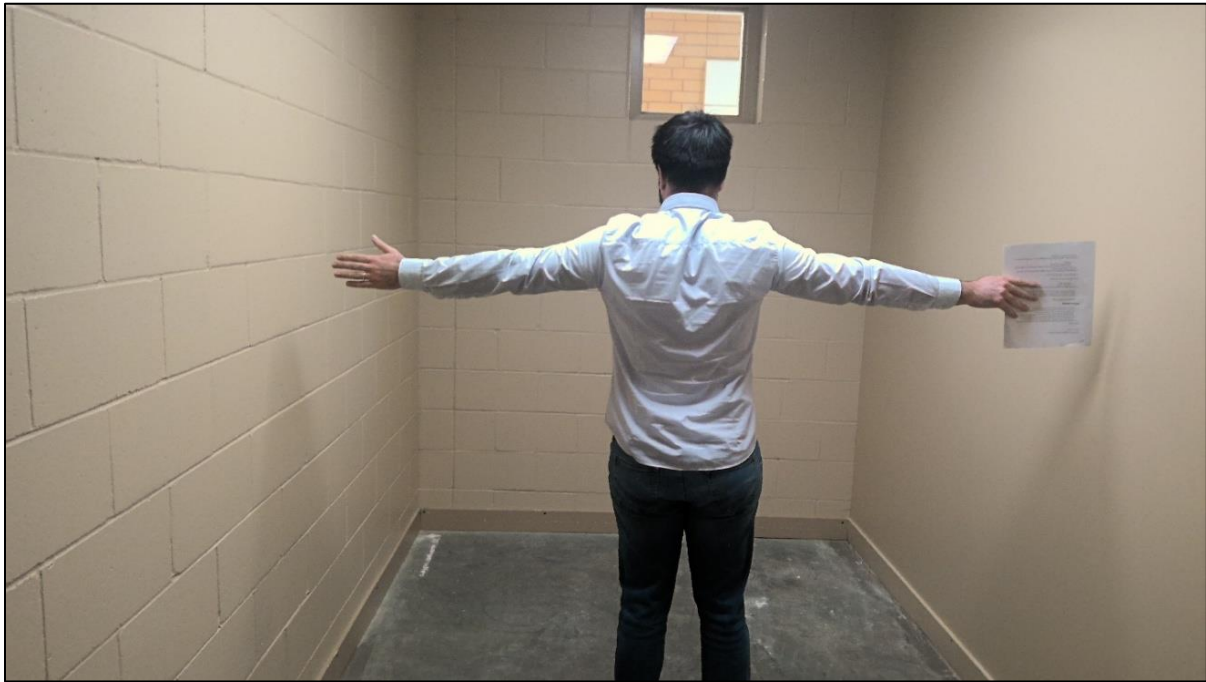


Image 24: Adult man approximately 5 feet 10 inches tall standing in middle of seclusion room that complies with Minnesota statute. Alliance Education Center – Rosemount, MN



Image 25: Adult man approximately 5 feet 10 inches tall standing in a seclusion room, as viewed from the staff member's observation window, with his arms partially extended to his sides and touching either wall of the seclusion room. The seclusion room's size is compliant with Minnesota statute. Concord Education Center - Inver Grove Heights, MN

KEY FINDINGS 4 • Building Requirements



Image 26: Adult man approximately 5 feet 10 inches tall sitting on the floor of a seclusion room, as viewed from the staff member's observation window. The seclusion room's size is compliant with Minnesota statute. Concord Education Center – Inver Grove Heights, MN



Image 27: Adult woman approximately 5 feet 4 inches tall standing within seclusion room for scale. This is one of the largest seclusion rooms MDLC monitored. SWWC Education Learning Center – Montevideo, MN

KEY FINDINGS 4 • Building Requirements



Image 28: Adult woman approximately 5 feet 3 inches tall standing within seclusion room for scale. Webster K-12 – North St. Paul, MN



Image 29: Seclusion room that meets the physical requirements mandated by Minnesota law. Rochester Phoenix Academy – Rochester, MN.

(ii) Rooms must be well lit, well ventilated, adequately heated, and clean.

Seclusion rooms were generally well lit, well ventilated, adequately heated, and clean. There were some rooms that did not appear clean or well kept, showing deteriorating floors or ceilings, dirty or stained floors. Bright overhead lights with white light were standard, either in the “on” or “off” position (no dimmers or colored lights, which are common in sensory or calming rooms). One seclusion room was shockingly cold, and school staff acknowledged that venting was dysfunctional and they were working to fix it.

KEY FINDINGS 4 • Building Requirements

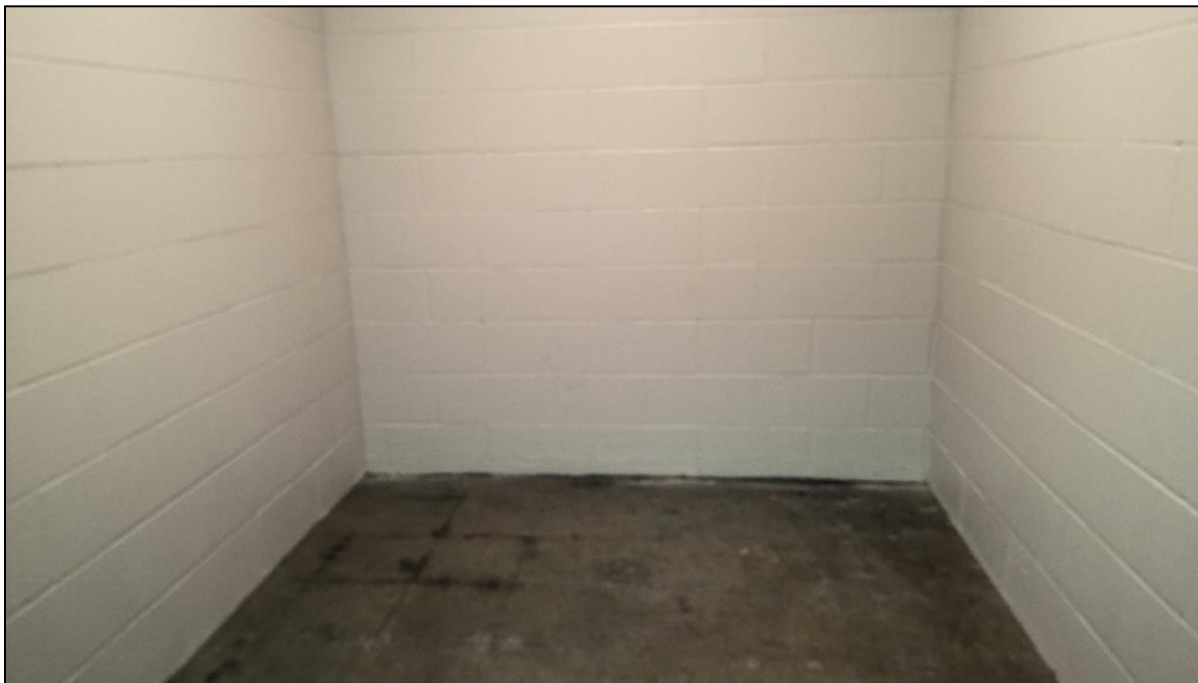


Image 30: Detail seclusion room floor which appears to be damp and/or stained. The pattern of damage is in a grid pattern, perhaps indicating a tile floor finish was removed at some point. Rochester Phoenix Academy – Rochester, MN.

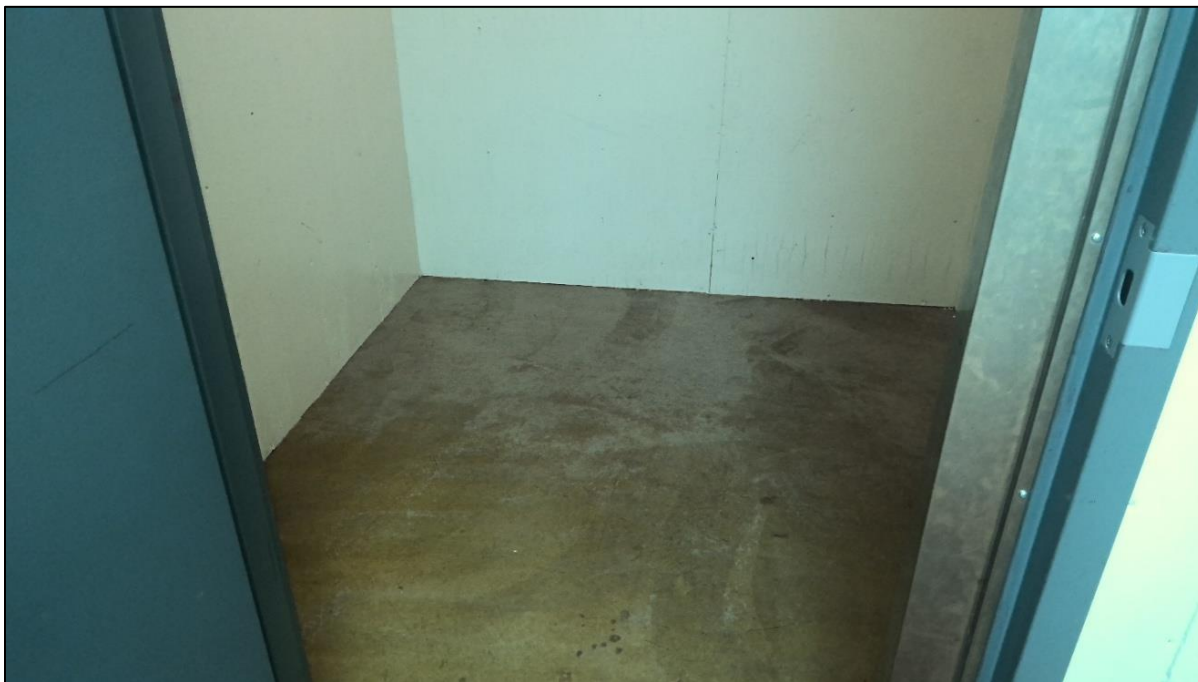


Image 31: Looking into a seclusion room with the door open, an unclean concrete floor with dust or dirt and what appears to be water damage along the lower six inches of the walls around the seclusion room. The long silver strip on the right side of the door is the magnetic (keyless) locking mechanism. Washington Elementary School – Rochester, MN

KEY FINDINGS 4 • Building Requirements



Image 32: Detail of seclusion room floor with damaged and unclean floor and walls, mold or water damage appearing in cracks between floor and walls. A piece of the floor tile is missing, leaving a jagged gap in the floor surface. Cambridge Intermediate School – Cambridge, MN



Image 33: Detail of seclusion room ceiling with grated light fixture and unsecured wall panels that have cracks and gaps between the panels. Additional screws and wood bracing runs along the top of the wall panels. Cambridge Intermediate School – Cambridge, MN

KEY FINDINGS 4 • Building Requirements



Video 8: Registered seclusion room from child's viewpoint, documenting damaged walls and floor. Cambridge Intermediate School – Cambridge, MN. Watch: <https://www.youtube.com/watch?v=tDFmxpraGrI>

KEY FINDINGS 4 • Building Requirements



Image 34: Registered seclusion room walls with small holes/indents, indicating the walls and fixtures are not tamperproof or clean as required by Minnesota statute. Franklin Elementary School – Rochester, MN.



Image 35: Seclusion room walls with small holes/indents, indicating the walls are not tamperproof. Franklin Elementary School – Rochester, MN

KEY FINDINGS 4 • Building Requirements

(iii) Rooms must have a window that allows staff to directly observe a child in seclusion.

All seclusion rooms that MDLC monitored had a small observation window that allows staff to directly observe a child in seclusion. However, it would be difficult to see the entire seclusion room through these windows unless a staff member stood directly in front of the window and observed all angles of the room the entire time of seclusion. Even then, staff might have to angle their body to see a small child. Most locking mechanisms (discussed below) require staff members to observe the child and push the lock with their hand simultaneously, causing the staff member to reach for the lock button while watching the child through the window.

Some windows were also covered with papers or stickers, leaving only a few inches of space for a staff member to see a child inside the room.

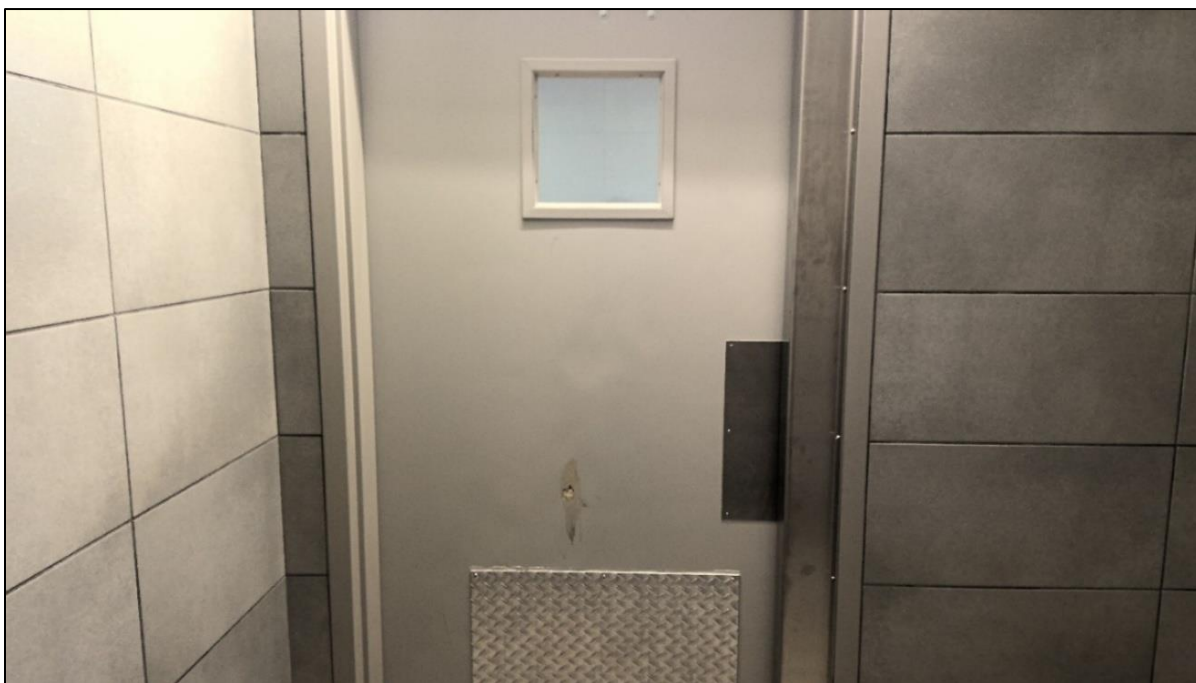


Image 36: Child's view while standing inside the registered seclusion room, looking out to small observation window/closed door where a staff member would observe child from outside the locked room. The window placed high in the door and would be difficult for a child to lookout to communicate with staff. The long silver strip on the right side of the door is the magnetic (keyless) locking mechanism. The door also features a metal "kick plate" on the bottom and damage to the door with a stain. Brookside Academy – Isanti, MN

KEY FINDINGS 4 • Building Requirements



Image 37: Child's view while inside a registered seclusion room, looking out to observation window/closed door. An adult man approximately 5 feet 9 inches tall stands where a staff member would observe a child from outside the locked door. This was one of the larger observation windows in seclusion rooms MDLC monitored. Concord Education Center – Inver Grove Heights, MN

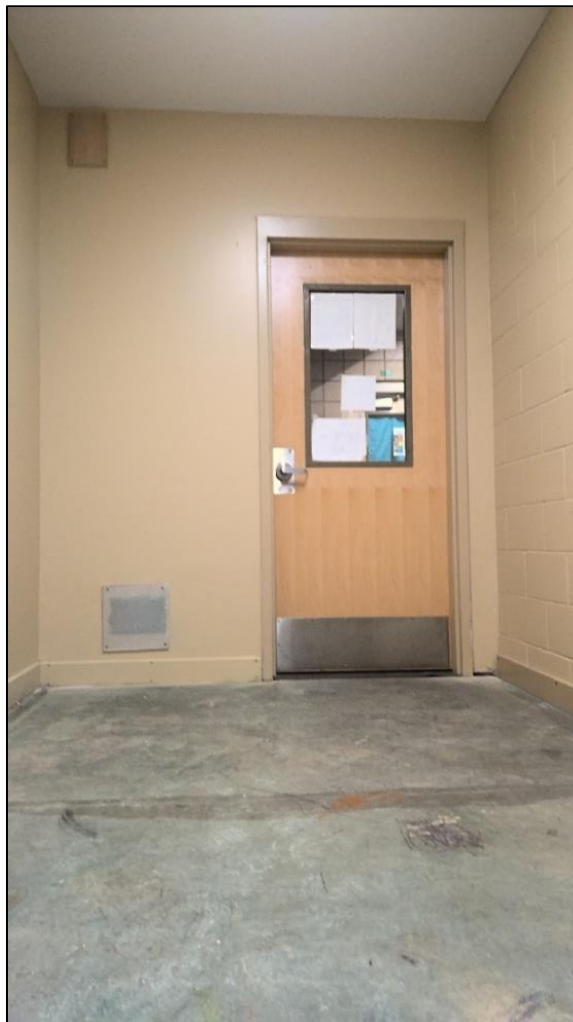


Image 38: Child's view while inside a registered seclusion room, looking out to observation window/closed door. The observation window is covered with multiple papers, obstructing the ability for a staff member to observe the child in seclusion, or the child to see staff. Cedar School – Eagan, MN

KEY FINDINGS 4 • Building Requirements



Image 39: Child's view while inside a registered seclusion room, looking out to observation window/closed door where a staff member would observe them from outside the locked room. The observation window – a narrow rectangle approximately 4 inches wide and 24 inches long – is a common design for seclusion rooms in Minnesota. The long silver strip on the left side of the door is the magnetic (keyless) locking mechanism. Alliance Education Center – Rosemount, MN



Image 40: Child's view while inside a registered seclusion room, looking out to observation window/closed door where a staff member would observe them from outside the locked room. An adult man approximately 5 feet 9 inches tall stands where a staff member would observe the child. The observation window – a narrow rectangle approximately 6 inches wide and 24 inches long – is a common design for seclusion rooms in Minnesota. SWWC Education Learning Center – Montevideo, MN

KEY FINDINGS 4 • Building Requirements



Image 41: Child's view while standing inside a registered seclusion room, looking out to observation window/closed door where a staff member would observe them from outside the locked room. An adult man approximately 5 feet 9 inches tall stands where a staff member would observe the child. This was one of the larger observation windows in seclusion rooms MDLC monitored. Observation window. Alliance Education Center – Rosemount, MN



Image 42: Child's view while inside a registered seclusion room, looking out to observation window/closed door where a staff member would watch them from outside the room. There are scratches on the child's side of the door, graffiti, and a dirty observation window. River Trail Learning Center – Coon Rapids, MN

KEY FINDINGS 4 • Building Requirements



Image 43: Timer on the staff side of a registered seclusion room door. Seclusion is only legally permitted in an “emergency,” a situation where immediate intervention is needed to protect a child or other individual from physical injury. This is an individualized determination based on need, not determined by a timer. Hoover Elementary School – Rochester, MN

- (iv) Rooms must have tamperproof fixtures, electrical switches located immediately outside the door, and secure ceilings.**

Most seclusion rooms that MDLC monitored had tamperproof fixtures, such as grates around smoke detectors in the ceiling, electrical switches located immediately outside the door, and secure ceiling. Some rooms had walls or doors with indents, indicating where a child may have caused damage to a surface that was not tamperproof.

KEY FINDINGS 4 • Building Requirements



Image 44: Seclusion room ceiling with secure ceiling, tamperproof light, and smoke alarm with a grate around it on ceiling. River Trail Learning Center – Coon Rapids, MN



Image 45: Seclusion room ceiling ventilation system, in compliance with Minnesotan statute. Bemidji High School – Bemidji, MN

KEY FINDINGS 4 • Building Requirements

- (v) **Rooms must have doors that open out and are unlocked, locked with keyless locks that have immediate release mechanisms, or locked with locks that have immediate release mechanisms connected with a fire and emergency system.**

All seclusion rooms that MDLC monitored had doors that opened out and had some form of lock. Of the eighty seclusion rooms observed, approximately one third (1/3) of rooms had traditional door locks that require a key, and two thirds (2/3) of rooms were keyless locks with immediate release mechanisms.

Keyless locks look like a push-button on the outside of the room that can be activated when a staff member pushes the button with their finger or palm of hand.

In order to use the most ubiquitous lock design, school staff places the child in the seclusion room (usually through a physical restraint that transports the child to the room), staff closes the door, and while the child is alone in the room, the staff member observes the child through the observation window and actively holds the lock button on the outside of the room with their hand. Holding the lock button activates a strip of heavy magnetic locks along the side of the door. Generally, the same staff member observes the child from the outside of the room and holds the lock button continuously.

Most seclusion room locks were magnetic strips built into the doors along the door jam. These were industrial, thick silver magnets alongside the door opening that locked in multiple places. MDLC staffers tested several doors as they were locked and the MDLC adult staff was inside the seclusion room; MDLC found the door when locked did not have any “give” at all, even when an adult pushed with all their force.



Image 46: Locking push-button mechanism outside of the seclusion room. Webster K-12 – North St. Paul, MN

Staff members interviewed stated that fire, power outage, or emergency protections are “automatic,” since as soon as the observing staff member lets go of pushing the lock button, the seclusion room door is automatically open.

KEY FINDINGS 4 • Building Requirements



Image 47: Outside of a registered seclusion room door with a red button to lock the door shut. School staff must hold the red button to keep the door locked while observing the child locked inside the room. The sign on the door, visible to the staff locking the door and observing the child, reads "Take a break, take a breath!" Franklin Elementary School – Rochester, MN

KEY FINDINGS 4 • Building Requirements



Image 48: Image Magnetic door lock running along the right side of the seclusion door. SWWC ELC - Montevideo, MN

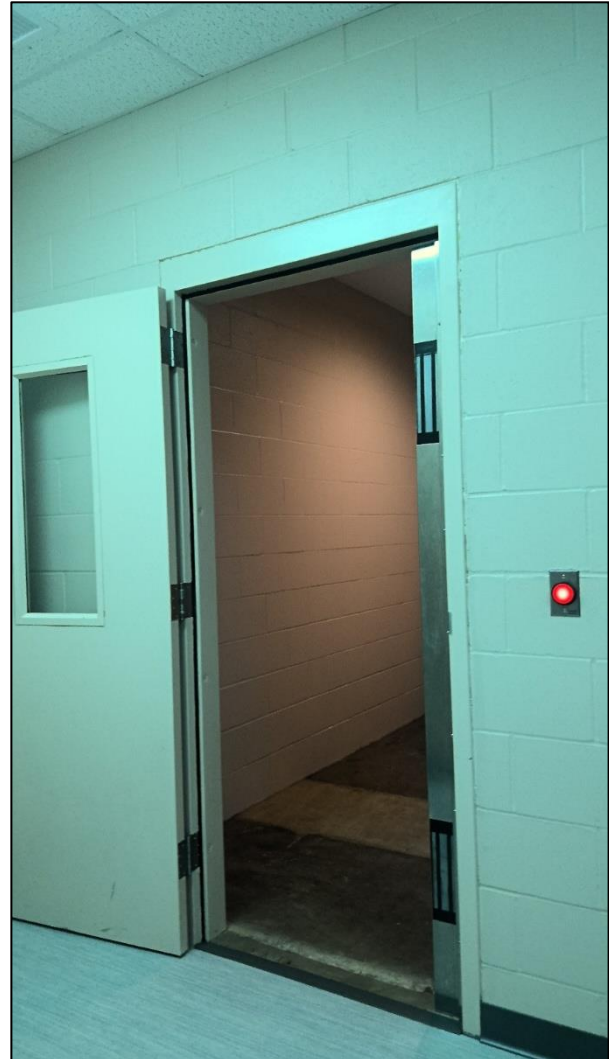


Image 49: The long silver strip on the right side of the door is the magnetic (keyless) locking mechanism. The locking push-button mechanism is glowing red. School staff must hold the red button to keep the door locked while observing the child locked inside the room. Rochester Phoenix - Rochester, MN

KEY FINDINGS 4 • Building Requirements



Image 50: Door lock and light outside of seclusion room door. SWWC ELC – Cosmos, MN

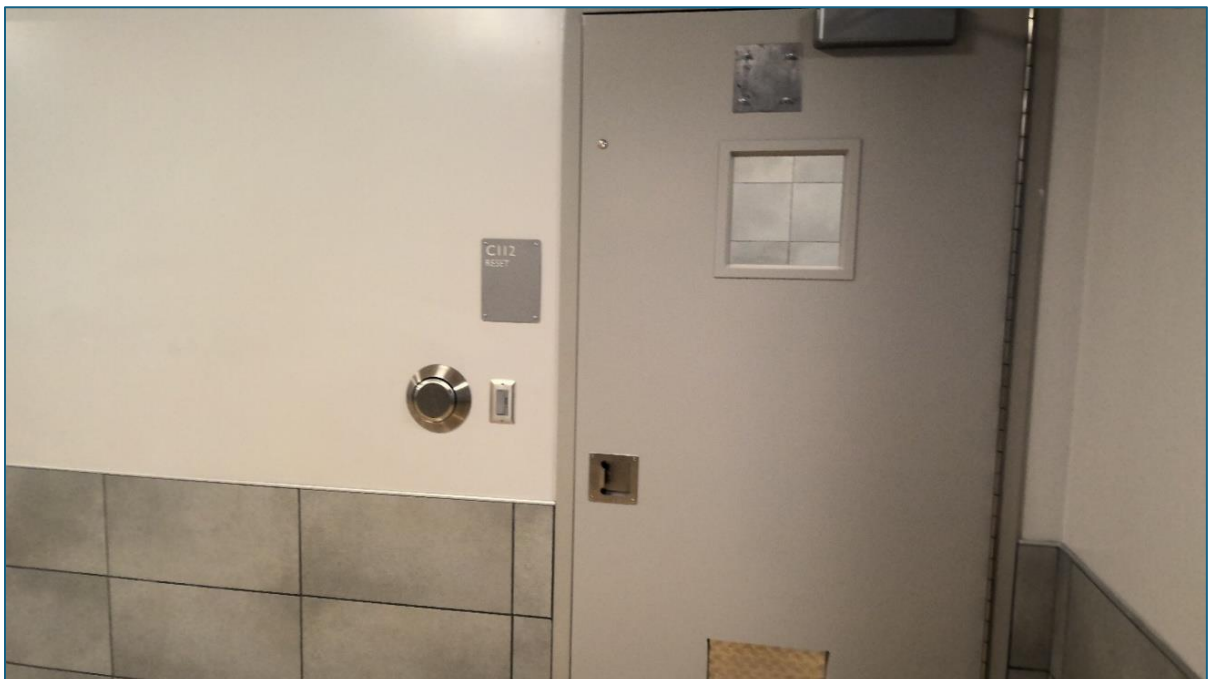


Image 51: Locking push button mechanism outside of seclusion room door. Brookside Academy – Isanti, MN

KEY FINDINGS 4 • Building Requirements



Image 52: Locking push button mechanism outside of seclusion room door. Isanti Intermediate School – Isanti, MN

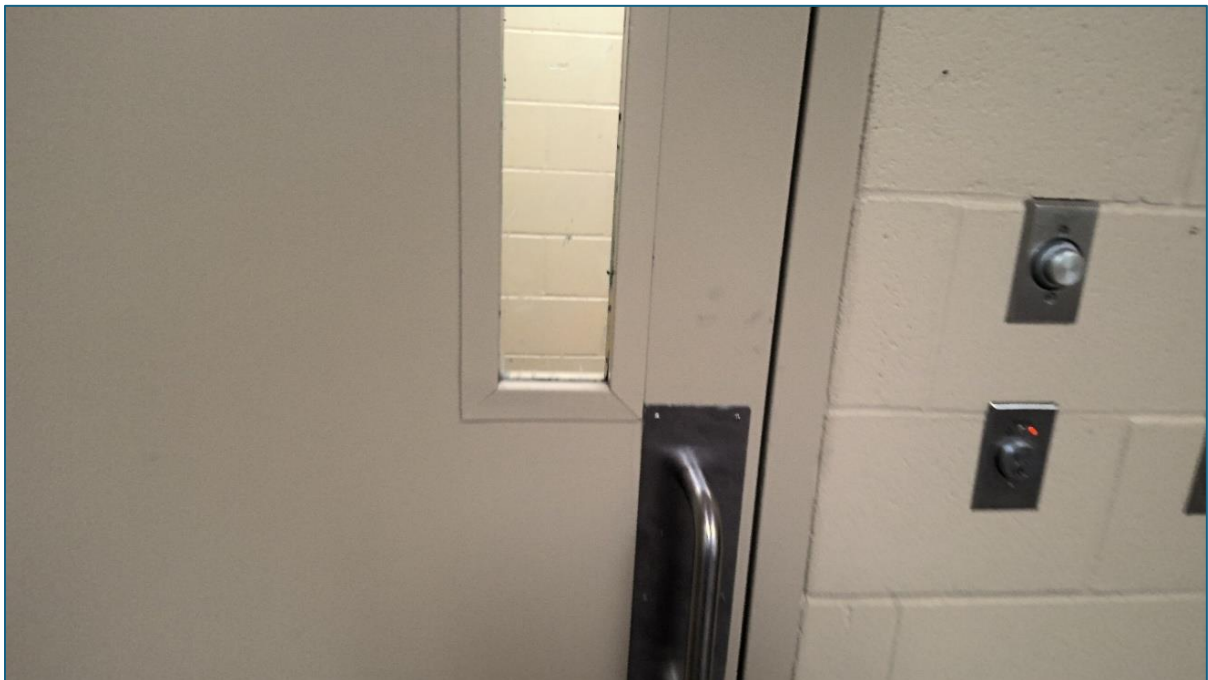


Image 53: Push-button lock mechanism outside of seclusion room door. Alliance Education Center – Rosemount, MN

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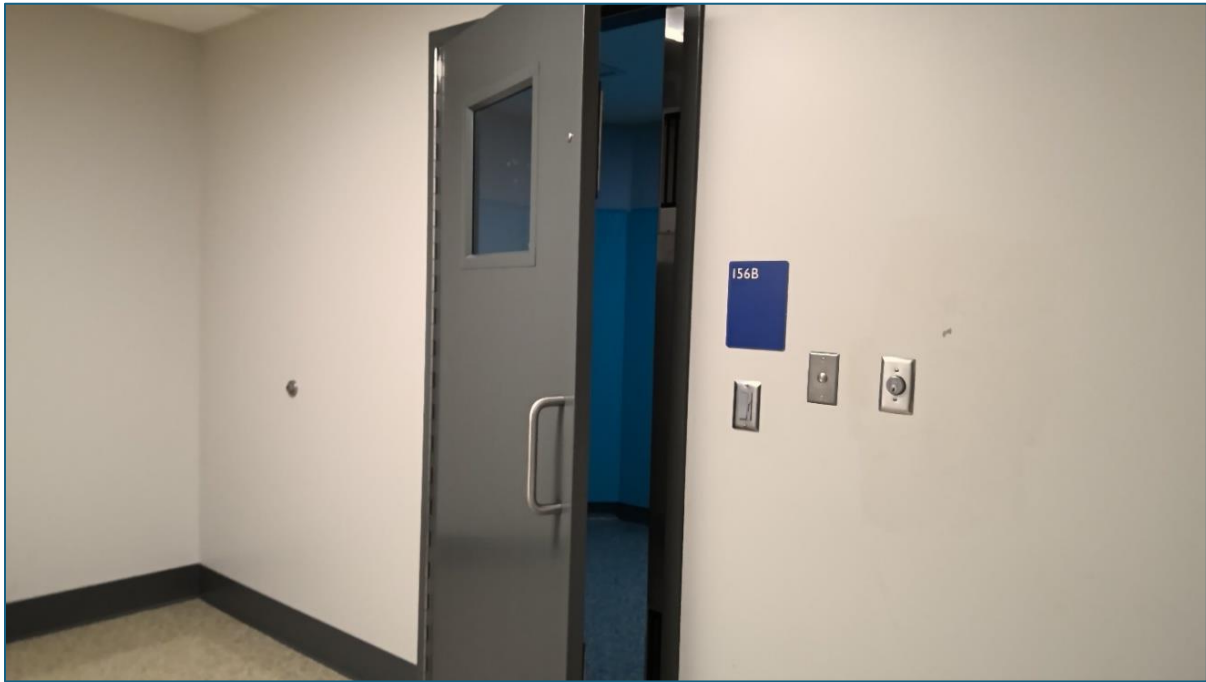


Image 54: Seclusion room door opening out, with magnetic locks alongside right side of door. SWWC Educational Learning Center – Cosmo, MN



Image 55: Seclusion room door opening out, with push-button mechanism on outside of door, and viewing into seclusion room with damaged walls and floor. Cambridge Intermediate School – Cambridge, MN

KEY FINDINGS 4 • Building Requirements

(vi) Rooms cannot contain objects that a child may use to injure the child or others.

Several registered seclusion rooms are primarily used as small workspaces or quiet areas with manipulatives inside, such as desks, bean bags, or sleeping mats. Two rooms contained a portable toilet; one room contained a rolling mattress; another room contained a hammock hanging from the ceiling. School staff interviewed stated that if a staff member decided to place a child in seclusion, the staff would first move the contents out of the room so that the dysregulated child would not use the objects to injure themselves or others (for example, by throwing a desk into the wall). School administrators reported that children may use the rooms for sleeping, working privately, or to deescalate, and staff will remove the objects (like desks and chairs) if they want to use the room for seclusion.

Seclusion is only legally permitted in an “emergency,” a situation where *immediate* intervention is needed to protect a child or other individual from physical injury.⁴⁸ If a room is full of furniture, it is not available in an emergency – some staff members have to work with the child and other staff members have to remove the furniture or manipulatives from the seclusion room. This delays any “immediate intervention” for the child and diverts precious staff attention from the child as some staff members work to empty out the seclusion space. It calls into question if there is truly an “emergency” requiring “immediate”

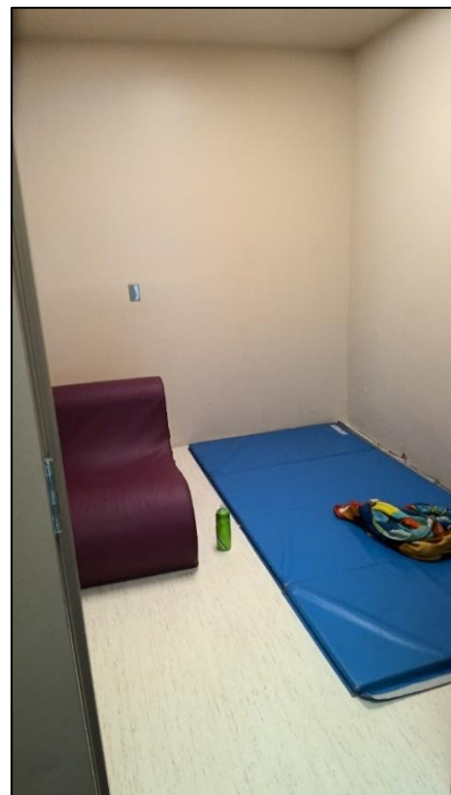


Image 56: Registered seclusion room with objects not in compliance with Minnesotan law which make use of the room impracticable or impossible. School staff stated that the objects inside that will be removed in emergencies when students are secluded inside the room. Dakota Ridge School – Apple Valley, MN

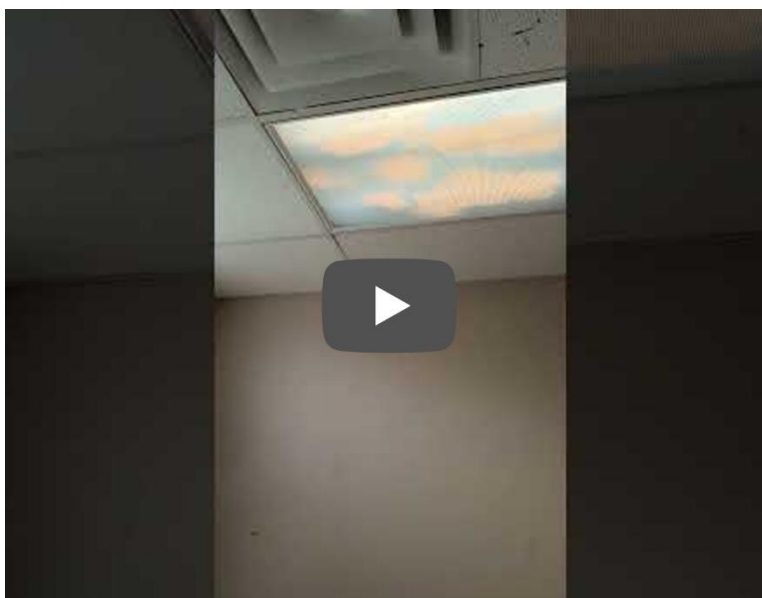
⁴⁸ Minn. Stat. § 125A.0941(b) defines “emergency”: “Emergency” means a situation where immediate intervention is needed to protect a child or other individual from physical injury. Emergency does not mean circumstances such as: a child who does not respond to a task or request and instead places his or her head on a desk or hides under a desk or table; a child who does not respond to a staff person's request unless failing to respond would result in physical injury to the child or other individual; or an emergency incident has already occurred and no threat of physical injury currently exists.

⁴⁸ Minn. Stat. § 125A.0942, subd. 3(4).

KEY FINDINGS 4 • Building Requirements

intervention when the school staff has time to move portable toilets, mattresses, sleeping mats, or desks full of objects out of the room before locking the child inside.

School staff reasoned that keeping objects in the seclusion room consistently allows students to use the rooms on a daily basis and be familiar with the space, making the room less trauma-inducing or associated with “bad feelings.” MDLC staff are concerned that schools continued to register the rooms as “seclusion rooms” when they were not available on an “emergency” basis and were instead used as independent workspaces. MDLC recommends these rooms are removed as registered seclusion rooms.



Video 7: Seclusion room not in compliance with physical requirements under law. The window is covered by blinds that are broken and contain material that could be used in self-harm by child. Dakota Ridge School – Apple Valley, MN. Watch: <https://www.youtube.com/watch?v=GUKex2abODg>

CONCLUSION

In 2025, MDLC monitored approximately 80 seclusion rooms of the 194 registered with MDE in the 2024-25 school year. MDLC discovered that the list registered with MDE is not an accurate reflection of the true amount of seclusion rooms in the state.

Seclusion rooms are located throughout the state of Minnesota, mostly in the Level 3 and 4 settings that serve children with disabilities. A school's use or non-use of seclusion is determined by the school; some Level 3 or Level 4 settings have opted to not use seclusion (example: Intermediate School District 287). A review of four similar Level 4 settings located within twenty miles of each other demonstrated wildly different reliance on seclusion (ranging from 0 seclusion rooms to 35 seclusion rooms in a single building), indicating the issue of seclusion is one of individual school culture.

The number of registered seclusion rooms and the use of seclusion has decreased in the last five school years in Minnesota. However, certain school districts have a disproportionate number of registered seclusion rooms and reliance on the use of seclusion with children with disabilities. Seclusion rooms are generally in compliance with the physical requirements of Minnesotan statute, but some rooms described here require improvements to ensure safety of children. Where schools use registered seclusion rooms for storage or other purpose, MDLC recommends the school remove the room from the seclusion room registry.

Additional monitoring is necessary to examine *how* seclusion is used on children with disabilities in Minnesota and the *effects* of seclusion on children with disabilities, families of children with disabilities, school staff. Additional monitoring should focus on the schools that disproportionately rely on seclusion.

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APPENDICES

Appendix A Minnesota Department of Education’s Registered Seclusion Rooms in 2024-25 School Year

PDF: <https://mylegalaid.org/wp-content/uploads/2026/02/Appendix-A-MDE-Registered-Seclusion-Rooms-2024-25.pdf>

Appendix B Minnesota Department of Education’s List of Schools Reporting the Use of Seclusion in the 2024-25 School Year

PDF: <https://mylegalaid.org/wp-content/uploads/2026/02/Appendix-B-MDE-List-of-Schools-Reporting-Seclusion-2024-25.pdf>

Appendix C Map of Registered Seclusion Rooms

PDF: <https://mylegalaid.org/wp-content/uploads/2026/02/Appendix-C-Map-of-Registered-Seclusion-Rooms-2024-25.pdf>

Appendix D Minnesota Department of Education’s Report to Legislature FY 2024

PDF: <https://mylegalaid.org/wp-content/uploads/2026/02/Appendix-D-MDE-Report-to-Legislature-FY-2024.pdf>

Appendix E Minnesota Department of Education’s Report to Legislature FY 2025

PDF: <https://mylegalaid.org/wp-content/uploads/2026/02/Appendix-E-MDE-Report-to-Legislature-FY-2025.pdf>