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| **MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**  **Program Quality Assurance Services** |

##### PROGRAM REVIEW

## CORRECTIVE ACTION PLAN

Special Education Agency: Robert F. Kennedy Children’s Action Corps

Program Review Onsite Year: 2016-2017

**Programs under review for the agency:**

A - RFK Academy Day Program

B - RFK Don Watson Academy

C - Lancaster Residential Program

All corrective action must be fully implemented and all noncompliance corrected as soon as possible and no later than one year from the issuance of the Program Review Final Report dated 08/29/2017.

**Mandatory One-Year Compliance Date:** **08/29/2018**

**Summary of Required Corrective Action Plans in this Report**

| **Criterion** | **Criterion Title** | **Applies To** | **PR Rating** |
| --- | --- | --- | --- |
| PS 11.6 | Master Staff Roster | A | Partially Implemented |
| PS 12.1 | New Staff Orientation and Training | A,B,C | Implementation In Progress |
| PS 12.2 | In-Service Training Plan and Calendar | A,B,C | Implementation In Progress |
| PS 13.4 | Physical Facility/Architectural Barriers | A,B,C | Partially Implemented |
| PS 14.2 | Food and Nutrition | B,C | Partially Implemented |

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| **Criterion & Topic:**  PS 11.6 Master Staff Roster | | **PR Rating:**  Partially Implemented |
| **Applies To:**  A - RFK Academy Day Program | | |
| **Department Program Review Findings:**  A review of documentation and interviews indicated that the Master Staff roster does not include all staff positions approved by ESE and does not correspond to the most recently approved program budget. For positions that have not been previously approved, a justification was not provided as required. | | |
| **Description of Corrective Action:**  The Experiment with Travel School will consult with legal counsel to identify the appropriate ESE mechanism to revise the staffing plan so that it includes all approved staff positions. | | |
| **Title/Role(s) of Responsible Persons:**  Leigh Mahoney, Senior Director of Education | | **Expected Date of Completion:**  03/01/2018 |
| **Evidence of Completion of the Corrective Action:**  The staffing plan will include all ESE-approved staff positions. | | |
| **Description of Internal Monitoring Procedures:**  Within 45 days, we will meet with legal counsel. Within 30 days thereafter, we will submit through the appropriate ESE mechanism. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 11.6 Master Staff Roster | **Corrective Action Plan Status:** Approved  **Status Date:** 10/02/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  For the 11/15/2017 progress report Experiment with Travel Day Program must submit evidence of a scheduled meeting date with legal counsel, and an update as to the mechanism by which the program intends to revise its staffing plan.  For the 12/22/2017 progress report the program must submit a master staff roster, using the standard form that can be found in the WBMS document library, that is consistent with the program's ESE approved staffing plan, via the mechanism determined and reported in the November 15, 2017 progress report. | | |
| **Progress Report Due Date(s):**  11/15/2017  03/06/2018 | | |

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| **Criterion & Topic:**  PS 12.1 New Staff Orientation and Training | | **PR Rating:**  Implementation In Progress |
| **Applies To:**  All | | |
| **Department Program Review Findings:**  A review of documentation, staff records and interviews revealed that while the policies and procedures for Behavior Support, Student Separation as the result of Behavior Support and Physical Restraint are now in compliance with the revised regulations that went into effect on January 1, 2016, staff need to be trained on these revised policies. | | |
| **Description of Corrective Action:**  All newly hired staff will be trained in the ESE approved revised policies and procedures for Behavior Support, Student Separation as the result of Behavior Support, and Physical Restraint. | | |
| **Title/Role(s) of Responsible Persons:**  Valerie Paen, Principal, Lancaster School  Rebel McKinley, Director EWT School | | **Expected Date of Completion:**  10/30/2017 |
| **Evidence of Completion of the Corrective Action:**  The program will submit evidence in the form of sign in sheets from the appropriate New Employee Orientation trainings. | | |
| **Description of Internal Monitoring Procedures:**  New Employee Orientation is tracked in aggregate and by individual through our HR database. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 12.1 New Staff Orientation and Training | **Corrective Action Plan Status:** Approved  **Status Date:** 10/02/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  For the November 15, 2017 progress report Experiment with Travel, Lancaster Day and Lancaster Residential Programs must submit (1) lists of all staff hired following the program review who have direct care duties with students, and (2) dates, copies of sign in sheets, and training materials from the New Employee Orientation training provided for these new staff in Behavior Support, Student Separation as the result of Behavior Support and Physical Restraint.  For the December 15, 2017 and May 24, 2018, progress reports, Experiment with Travel, Lancaster Day and Lancaster Residential Programs must provide results of the reviews of the new employee orientation database, regarding whether new staff had appropriate training in Behavior Support, Student Separation as the result of Behavior Support and Physical Restraint. | | |
| **Progress Report Due Date(s):**  11/15/2017  03/06/2018  07/27/2018 | | |

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| **Criterion & Topic:**  PS 12.2 In-Service Training Plan and Calendar | | **PR Rating:**  Implementation In Progress |
| **Applies To:**  All | | |
| **Department Program Review Findings:**  A review of documentation, staff records and interviews revealed that while the policies and procedures for Behavior Support, Student Separation as the result of Behavior Support and Physical Restraint are now in compliance with the revised regulations that went into effect on January 1, 2016, staff need to be trained on these revised policies. | | |
| **Description of Corrective Action:**  All existing staff will be trained in the ESE approved revised policies and procedures for Behavior Support, Student Separation as the result of Behavior Support, and Physical Restraint. | | |
| **Title/Role(s) of Responsible Persons:**  Valerie Paen, Principal Lancaster School  Rebel McKinley, Director EWT School | | **Expected Date of Completion:**  10/30/2017 |
| **Evidence of Completion of the Corrective Action:**  The program will submit evidence in the form of sign in sheets from the appropriate inservice trainings. | | |
| **Description of Internal Monitoring Procedures:**  In service training is tracked in aggregate and by individual through our HR database. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 12.2 In-Service Training Plan and Calendar | **Corrective Action Plan Status:** Approved  **Status Date:** 10/02/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  For the November 15, 2017 progress report Experiment with Travel, Lancaster Day and Lancaster Residential Programs must submit (1) lists of all staff who have direct care duties with students, and (2) dates, sign in sheets, and training materials from the training provided for these staff in Behavior Support, Student Separation as the result of Behavior Support and Physical Restraint. | | |
| **Progress Report Due Date(s):**  11/15/2017  03/06/2018  07/27/2018 | | |

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| **Criterion & Topic:**  PS 13.4 Physical Facility/Architectural Barriers | | **PR Rating:**  Partially Implemented |
| **Applies To:**  All | | |
| **Department Program Review Findings:**  Observations and interviews revealed that not all areas of the facility utilized by students are accessible to individuals with limited physical mobility. | | |
| **Description of Corrective Action:**  The RFK Children's Action Corps acknowledges that our schools are not accessible to students with limited mobility. In addressing this, the organization has identified that both the EWT and Lancaster school buildings will need to be replaced, though they are at different stages in their pursuit of new locations, thereby requiring separate plans and timelines.  EWT School: After engaging in extensive exploration on the viability of rehabilitating the EWT School building with its landlord, the group determined that the building could not be made accessible to students with limited mobility. EWT School has now formally submitted notice that that it will be ending its lease. The school is currently working with a realtor to find a new property in Holyoke, or if necessary, surrounding towns. In the meantime, the following steps have been taken to ensure students with limited mobility can access all EWT programming:  -physical education is offered at the local YMCA for all EWT students, in a building which is already accessible  -art and music are offered on the first floor  -after lunch activities (designated by student choice) will only be offered in accessible spaces.  Lancaster School: The Lancaster School has begun working with a realtor to locate a new property in Lancaster or nearby. However, there are fewer appropriate properties available, and we are limited by the requirement of maintaining proximity to the residence for the residential component of the school. In the meantime, the following steps have been identified to ensure students with limited mobility can access all Lancaster School programming:  -computers will be offered (for all students) in first floor classrooms  -the school will review (and revise where necessary) its methodology and the scope and sequence of its physical education curriculum to offer phys ed out of doors (when possible) and on the first floor.  -a manual stair chair will be purchased to make the school's basement level library accessible to those with limited mobility  -a team of school personnel will be trained in the use of the chair  Our ultimate goal is to have school buildings designed to facilitate the optimal delivery of our curricula to all of our students. In addition, we want these buildings to be welcoming and equitable to all students and their families. The interim plans outlined above are not our optimal delivery, to be sure-- but they will allow us to provide access to programming to all students, while we engage in the longer term work of designing and acquiring exceptional and accessible educational spaces. | | |
| **Title/Role(s) of Responsible Persons:**  Leigh Mahoney-Sr. Dir. of Education  Rebel McKinley-EWT Dir.  Val Paen-Lancaster Principal | | **Expected Date of Completion:**  08/29/2018 |
| **Evidence of Completion of the Corrective Action:**  EWT School:  -signed lease for new building (03/30/2018)  -licenses and certificates necessary for DESE approval of new site (07/27/2018)  Lancaster School:  -First floor classrooms equipped with computers/technology (01/05/2018)  -First floor and outdoor phys ed spaces ready for use (10/27/2017)  -Documentation of changes to physical education delivery complete (scope and sequence, modalities) (03/09/2018)  -Manual stair chair purchased (11/30/2017)  -Staff training on use of manual stair chair (12/15/2018)  -Plan submitted for school relocation (including timelines for signed lease, licenses/certificates for DESE approvals, and move) (08/29/2018) | | |
| **Description of Internal Monitoring Procedures:**  For both schools, progress on the above outcomes/timelines will be monitored through:  Twice monthly supervision of school leaders  Internal program review process  Board governance  Strategic plan review process (with senior leadership and board of directors)  Real estate acquisition process (with senior leadership and board of directors) | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 13.4 Physical Facility/Architectural Barriers | **Corrective Action Plan Status:** Approved  **Status Date:** 10/02/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  For the November 15, 2017 progress report Experiment with Travel Program must submit a written assurance that the gym will be provided and accessed by all students in the YMCA, that art and music classes will be provided on the first floor and that after lunch activities will only be provided in accessible spaces. The program must also submit a detailed narrative regarding the search for new space.  For November 15, 2017 progress report Lancaster Program must submit a written assurance that computers are available in the first floor classrooms to all students and that physical education instruction will occur outside or on the first floor.  For the December 22, 2017 progress report Lancaster Program must submit (1) evidence of the purchase of a manual stair chair to provide access to the basement, and (2) evidence that appropriate staff have been trained to utilize the stair chair, specifically, the names and roles of staff, dates of training, attendance sheets and training materials.  For the May 24, 2018 progress report Experiment with Travel and Lancaster Day Programs must submit a detailed narrative regarding the search for new space for the programs. | | |
| **Progress Report Due Date(s):**  11/15/2017  03/06/2018  07/27/2018 | | |

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| **Criterion & Topic:**  PS 14.2 Food and Nutrition | | **PR Rating:**  Partially Implemented |
| **Applies To:**  B - RFK Don Watson Academy  C - Lancaster Residential Program | | |
| **Department Program Review Findings:**  A review of the documentation revealed that the written plan on food and nutrition does not describe how the required communication between the program and the sending school districts occurs for lunch, and, if applicable, for breakfast. | | |
| **Description of Corrective Action:**  The Lancaster School will update its policy to describe how the required communication between the program and the sending school districts occurs for lunch and breakfast. | | |
| **Title/Role(s) of Responsible Persons:**  Valerie L. Paen, Principal Lancaster School | | **Expected Date of Completion:**  10/01/2017 |
| **Evidence of Completion of the Corrective Action:**  Will upload revised policy and sample letter sent to districts | | |
| **Description of Internal Monitoring Procedures:**  Revised policy and letter to districts reviewed | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 14.2 Food and Nutrition | **Corrective Action Plan Status:** Approved  **Status Date:** 10/02/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  For the November 15, 2017 progress report Lancaster Day & Residential programs must submit (1) an updated Food and Nutrition policy describing how the required communication and collaboration between the programs and the sending school districts occurs to ensure that students with disabilities have access to breakfast and lunch, if they would have had access to such meals in their sending school districts, and (2) evidence of this communication and collaboration. | | |
| **Progress Report Due Date(s):**  11/15/2017 | | |