MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION

Program Quality Assurance Services

PROGRAM REVIEW

CORRECTIVE ACTION PLAN

Special Education Agency: Camp Sunshine Program Review Onsite Year: 2019-2020

**Programs under review for the agency: Reed Academy Day 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 02/04/2020.*

Mandatory One-Year Compliance Date: 02/04/2021

Summary of Required Corrective Action Plans in this Report

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| **Criterion** | **Criterion Title** | **PR Rating** |
| PS 4.4 | Advance Notice of Proposed Program/Facility Change | Partially Implemented |
| PS 4.5 | Immediate Notification | Partially Implemented |
| PS 5.1 | Student Admissions | Partially Implemented |
| PS 6.1 | Daily Instructional Hours/6.4 School Days Per Year | Partially Implemented |
| PS 9.1(a) | Student Separation Resulting from Behavior Support | Implementation In Progress |
| PS 11.5 | Related Services Staff | Partially Implemented |

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| **Criterion** | **Criterion Title** | **PR Rating** |
| PS 11.6 | Master Staff Roster | Partially Implemented |

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| **Criterion & Topic:**  PS 4.4 Advance Notice of Proposed Program/Facility Change | | **PR Rating:**  Partially Implemented |
| **Department Program Review Findings:**  A review of documentation and interviews indicated that the program does not have a policy addressing advance notice of proposed program/facility changes. Additionally, the program did not request prior approval through the required Form 1 for a 20% increase in student enrollment based on the most recently approved DESE student enrollment. | | |
| **Description of Corrective Action:**  Reed Academy will developed and implement a policy addressing advance notice of proposed program/facility changes.  Reed Academy has disseminated the revised policy and procedures,has trained staff on effective implementation regarding this policy addressing the DESE requirements for advance notice of proposed program/facility changes. Reed Academy authorized personnel will submit all Form 1 requests (as stated in PS Criterion #4.4) through the Web-Based Monitoring System (WBMS). Additional instructions and guidance can be found in the WBMS in the Security Portal of the DESE website as well as in the Reed Academy Policy and Procedure Manual.  Prior to any substantial change to the program or physical plant, Reed Academy will provide written notification of intent to change to the Department. Notice shall be given with sufficient time to allow the Department to assess the need for the proposed change and the effects of such change on the educational program. Reed Academy will also provide written notification to the Department of any sudden and/or unexpected changes that may impact the overall health or safety of students and/or the delivery of services required by IEPs. | | |
| **Title/Role(s) of Responsible Persons:**  Mary Crawford, Executive Director | | **Expected Date of Completion:** 02/28/2020 |
| **Evidence of Completion of the Corrective Action:**  Administrative work group will/has revised the policy and procedures regarding PS Criterion #4.4 to policy and procedure manual.  Reed Academy will/has disseminate(d )the revised policy and procedures to all appropriate staff  Reed Academy will have staff training on effective implementation of PS Criterion #4.4 | | |
| **Description of Internal Monitoring Procedures:**  At departmental and full staff meetings the Form 1 will be reviewed with question and answer period follow up. This process will be included in yearly mandatory staff meetings. By use of this review and feedback, Reed Academy will be able to direct training to ensure on-going compliance.  During scheduled mandatory staff program training Reed Academy will/has hand out and review revisions regarding PS Criterion #4.4, Form 1 procedures. During this training staff will discuss all aspects of this criterion. All evidence including Reed Academy policy and procedure information and staff training has been uploaded to the security portal | | |
| **CORRECTIVE ACTION PLAN APPROVAL SECTION** | | |
| **Criterion:**  PS 4.4 Advance Notice of Proposed Program/Facility Change | **Corrective Action Plan Status:** Approved  **Status Date:** 10/07/2020  **Correction Status:** Not | |

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| **Basis for Decision:** | |
| **Department Order of Corrective Action:** | |
| **Required Elements of Progress Report(s):**  For the 10/28/2020 progress report, the program must submit a copy of the policy and procedures for criterion 4.4 specific to Advanced Notice of Proposed Program/Facility Change that includes all required elements.  For the 11/16/2020 progress report, and once the Department has approved the Advanced Notice of Proposed Program/Facility Change Policy and Procedures, the program must provide evidence of training for all staff by submitting 1) the name and job title of the person conducting the training; 2) the dates and times when this training was held;  3) the length of time allotted for the training; 4) a list of all staff in alphabetical order by last name with their position title; and 5) for any staff who did not receive the training, the reason why and when their training is scheduled. | |
| **Progress Report Due Date(s):**  10/28/2020  01/08/2021  02/03/2021 | |

PROGRAM REVIEW CORRECTIVE ACTION PLAN

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| **Criterion & Topic:**  PS 4.5 Immediate Notification | **PR Rating:**  Partially Implemented |
| **Department Program Review Findings:**  A review of documentation indicated that the Immediate Notification Policy did not include all required and updated information. Additionally, a review of student records and interviews indicated that program staff were unclear about their reporting responsibilities to the Department and therefore did not provide notification to the Department of Elementary and Secondary Education for a serious incident that required police involvement. | |
| **Description of Corrective Action:**  Reed Academy will revise it's policy and procedure manual (and train all staff on such revisions), include all information in student records and train staff in reporting responsibility to the Department to include all required and updated information included in PS Criterion #4.5 regarding "Serious Incidents Immediate Notification and Reporting" as noted below:   1. The death of any student; (Immediate verbal and written notification to the student?s parents/guardians and school district); 2. The filing of a 51-A report with Department of Children and Families (DCF) OR a complaint filed with the Disabled Persons Protection Commission (DPPC), against the school or a school staff member, for abuse or neglect of any student; 3. Any action taken by a federal, state, or local agency that might jeopardize the school?s approval with ESE (i.e. federal or state investigation; closure of intake); 4. Any legal proceeding brought against the school or its employee(s) arising out of circumstances related to the care or education of any of its students; 5. The hospitalization of a student (including out-patient emergency room visits) due to physical injury at school or previously unidentified illness, accident or disorder which occurs while the student is in the program; 6. A student run from the program; and 7. Any other incident of a serious nature that occurs to a student or staff in the program. (Some examples include: any police involvement, any media involvement, weapons, fire setting, alcohol or drug possession or use while in the program).   FOR BOTH SCHOOL AND RESIDENTIAL HOURS:   1. The emergency termination of a student pursuant to 28.09(12)(b). | |

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| **Title/Role(s) of Responsible Persons:**  Mary Crawford, Executive Director | | **Expected Date of Completion:** 02/28/2020 |
| **Evidence of Completion of the Corrective Action:**  Reed Academy will provide training for staff regarding the Immediate Notification Policy and required documentation. Program Directors will oversee and ensure staff understanding and program compliance. | | |
| **Description of Internal Monitoring Procedures:**  At departmental and full staff meetings the Immediate Notification Policy will be reviewed with question and answer period follow up. This process is/will be included in yearly mandatory staff meetings and all aspects discussed regularly. By use of this review and feedback, Reed Academy will be able to direct training to ensure on-going compliance. | | |
| **CORRECTIVE ACTION PLAN APPROVAL SECTION** | | |
| **Criterion:**  PS 4.5 Immediate Notification | **Corrective Action Plan Status:** Approved  **Status Date:** 10/07/2020  **Correction Status:** Not  Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  For the 10/282020 progress report, the program must submit a copy of the policy and procedures for criterion 4.5 specific to "Serious Incidents Immediate Notification and Reporting" that includes all required elements.  For the 11/16/2020 progress report, and once the Department has approved the Advanced Notice of "Serious Incidents Immediate Notification and Reporting", the program must provide evidence of training for all staff by submitting 1) the name and job title of the person conducting the training; 2) the date and time when this training was held; 3) the length of time of the training; 4) a list of all staff in alphabetical order by last name with their position title; and 5) for any staff who did not receive the training, the reason why and when their training is scheduled. | | |
| **Progress Report Due Date(s):**  10/28/2020  01/08/2021  02/03/2021 | | |

PROGRAM REVIEW CORRECTIVE ACTION PLAN

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| **Criterion & Topic:**  PS 5.1 Student Admissions | **PR Rating:**  Partially Implemented |
| **Department Program Review Findings:**  A review of documentation indicated that not all required elements were included in the Student Admissions Policy. Specifically, the policy and procedures did not state that the program ensures that all newly enrolled students must be found eligible for Special Education and be on an approved Individualized Education Program. | |
| **Description of Corrective Action:**  Reed Academy ensures (and will include in it's Policy and Procedure Manual) that all newly enrolled students must be found eligible for Special Education and be on an approved Individualized  Education Program.  Furthermore, Reed Academy will develop and implement a written admissions policy that includes the following:   1. A statement that Reed Academy maintains a copy of its policies and procedures manual on site 2. A statement that Reed Academy provides written notice to parents of enrolled students that copies of its policies and procedures manual are available upon request 3. A statement that the Physical Restraint Policy and Procedures are made available to parents of enrolled students 4. A statement that all newly enrolled students must be found eligible for special education and on an approved Individualized Education Program 5. Admission criteria 6. Admission procedures 7. Information required from the referring school district(s) as part of the application process 8. Procedures followed to determine whether the student will be admitted 9. A statement that prior to admission, documentation is required from a licensed physician of a complete physical examination of the student not more than twelve months before admission 10. A statement that in the event of emergency placements, the program shall make provisions for a complete examination of the student within 30 days of admission 11. A statement that prior to admission, and upon request, the Executive Director of Reed Academy or a designee will be available to the parents student, and public school district for an interview. The interview shall include an explanation of Reed Academy?s purpose and services, policies regarding student and parent rights, including student records, the health program including the procedures for providing emergency health care, and the procedure for termination of a student. The interview will allow for the opportunity for the student and parents to see the facilities, meet the staff members and to meet enrolled students. 12. At admission, a Reed Academy Student Handbook will be given to each family, which should be reviewed together. The signature page at the end of the Handbook must be signed by both parties and returned to the office to be part of the student?s record. | |
| **Title/Role(s) of Responsible Persons:**  Mary Crawford, Executive Director | **Expected Date of Completion:** 02/28/2020 |
| **Evidence of Completion of the Corrective Action:** | |

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| Administrative work group will/has revised the policy and procedures regarding PS Criterion #5.1 to policy and procedure manual.  Reed Academy will/has disseminate the revised policy and procedures to all appropriate staff  Reed Academy will have staff training on effective implementation of PS Criterion #5.1 Reed Academy will provide training for staff specifically regarding the policy and procedures that the program ensures that all newly enrolled students must be found eligible for Special Education and be on an approved Individualized Education Program. Program Director will oversee compliance and regular review. | |
| **Description of Internal Monitoring Procedures:**  At departmental and full staff meetings include review of student admissions policy and procedure, specifically noting that the program ensures that all newly enrolled students must be found eligible for Special Education and be on an approved Individualized Education Program. Staff training regularly includes all aspects of PS Criterion #5.1 Student Admissions. By use of this review and feedback, Reed Academy will be able to direct training to ensure on-going compliance. By planning and implementing these procedures, Reed Academy assumes management responsibility. | |
| **CORRECTIVE ACTION PLAN APPROVAL SECTION** | |
| **Criterion:**  PS 5.1 Student Admissions | **Corrective Action Plan Status:** Approved  **Status Date:** 10/07/2020  **Correction Status:** Not  Corrected |
| **Basis for Decision:** | |
| **Department Order of Corrective Action:** | |
| **Required Elements of Progress Report(s):**  For the 10/28/2020 progress report, the program must submit a copy of the policy and procedures for criterion 5.1 specific to "Student Admissions" that includes all required elements.  For the 11/16/2020 progress report, and once the Department has approved the Advanced Notice of "Student Admissions", the program must provide evidence of training for all staff by submitting 1) the name and job title of the person conducting the training;  2) the date and time when this training was held; 3) the length of time for the training; 4) a list of all staff in alphabetical order by last name with their position title; and 5) for any staff who did not receive the training, the reason why and when their training is scheduled. | |
| **Progress Report Due Date(s):**  10/28/2020  01/08/2021  01/15/2021 | |

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| **Criterion & Topic:**  PS 6.1 Daily Instructional Hours/6.4 School Days Per Year | **PR Rating:**  Partially Implemented |
| **Department Program Review Findings:**  A review of documentation indicated that the program did not include at least five additional school days to account for unforeseen circumstances. Additionally, the structured learning time worksheet did not include all student learning time in the calculations, causing the total amount of student hours to be incorrect. | |
| **Description of Corrective Action:**  Reed Academy assures that at least five additional days to account for unforeseen circumstances will be included in the yearly calendar. Reed Academy assures that the structured learning time worksheet will include the correct total amount of student time in learning hours. Administrative staff will ensure that this information is correctly noted and program director will follow up with ensuring compliance.  Reed Academy worked with their liaison during the CPR site visit and corrected and submitted the correct calendar with the 5 additional school days to account for unforeseen circumstances. At the CPR site visit Reed Academy also worked with liaison and corrected the structured learning time worksheet to include all student learning time in the calculations, correcting the amount of student hours. | |
| **Title/Role(s) of Responsible Persons:**  Mary Crawford, Executive Director | **Expected Date of Completion:** 02/28/2020 |
| **Evidence of Completion of the Corrective Action:**  Reed Academy will correct and submit the school calendar noting the 5 additional school days added to account for unforeseen circumstances.  Reed Academy ensures, will document, and submit that each student is scheduled to receive a minimum of the following instructional hours over the program 216 days unless otherwise approved by DESE or a student?s IEP provides otherwise:  Elementary A total of: 1080 hours Secondary A total of: 1188 hours | |
| **Description of Internal Monitoring Procedures:**  Before the beginning of each school year, Reed Academy will continue to set a school year schedule for the program. This schedule will contain the number of school days per year DESE approved the program to operate, which will also include at least five additional school days to account for unforeseen circumstances (i.e., snowstorms, flood, etc.)  Reed Academy will complete Approved Special Education School Structured Learning Time Worksheet and ensures that its structured learning time and scheduling is time during which students are engaged in regularly scheduled instruction, learning or assessments within the curriculum of core subjects and other subjects as defined in 603 CMR 27.02. Reed Academy's structured learning time may include directed study (activities directly related to a program of studies, with a teacher available to assist students); independent study (a rigorous, individually designed program under the direction of a teacher, assigned a grade and credit); technology-assisted learning; presentations by persons other than teachers; school-to-work programs; and statewide student performance assessments. The hours spent in any type of structured learning time will be verified by the approved special education school program. Where the | |

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| program counts independent study or a school-to-work program as structured learning time, it has guidelines that explain clearly how hours spent by students are verified. This will be reviewed and included in regular staff training. By use of this review and feedback, Reed Academy program director will be able to direct training and oversee compliance. | |
| **CORRECTIVE ACTION PLAN APPROVAL SECTION** | |
| **Criterion:**  PS 6.1 Daily Instructional Hours/6.4 School Days Per Year | **Corrective Action Plan Status:** Approved  **Status Date:** 10/07/2020  **Correction Status:** Not  Corrected |
| **Basis for Decision:** | |
| **Department Order of Corrective Action:** | |
| **Required Elements of Progress Report(s):**  The program must submit a copy of the 2020-2021 school calendar that includes a minimum of 5 days to account for weather related or other emergencies, as well as, the 2020-2021 Structured Learning Time Worksheet that includes all structured learning time hours. | |
| **Progress Report Due Date(s):**  10/28/2020  01/08/2021 | |

PROGRAM REVIEW CORRECTIVE ACTION PLAN

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| **Criterion & Topic:**  PS 9.1(a) Student Separation Resulting from Behavior Support | **PR Rating:** Implementation In Progress |
| **Department Program Review Findings:**  A review of documentation indicated that the Policies and Procedures regarding Student Separation Resulting from Behavior Support included requirements that a student must be continuously observed by a staff member at all times, that staff shall be with the student or immediately available to the student at all times, that procedures are in place for obtaining principal approval for a student separation lasting more than 30 minutes, based upon the student's continuing agitation, and that student separation shall cease as soon as the student has calmed. However, student record review, observations and staff interviews indicated that staff are not aware they need to obtain principal approval for a student separation lasting more than 30 minutes. | |
| **Description of Corrective Action:**  Reed Academy administration met and discussed with entire staff the policy and procedure regarding PS Criterion #9.1(a)- Student Separation Resulting from Behavior Support, particularly emphasizing that principal approval must be obtained for a student separation lasting more than 30 minutes Revision of policy was discussed and a plan was developed to put revisions in policy and procedure manual, disseminate the revised policy and procedures to appropriate staff and plan for training (including yearly review as well as regular review at staff meetings and to be included in training addressed with any new hires). | |
| **Title/Role(s) of Responsible Persons:**  Mary Crawford, Executive Director | **Expected Date of Completion:** 02/28/2020 |
| **Evidence of Completion of the Corrective Action:**  Reed Academy includes in the Policy and Procedure Manual according to P.S. 9.1 Student Separation Resulting From Behavioral Support and has trained staff and had all staff sign off on receiving training on the following content:  As stated in the Reed Academy Policies and Procedures Manual, behavior support policies and procedures result in a student separating from the group or program activities, shall include:  l. A requirement that students shall be continuously observed by a staff member and staff shall be with the student or immediately available to the student at all times.  2. A procedure for obtaining principal approval of time-out for more than 30 minutes based upon the individual student's continuing agitation; and | |

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| 3. A requirement that time out shall cease as soon as the student has calmed.  Parents and Guardians are required to be informed of the behavioral support policies. Newly hired staff must read and sign off on the Policies and Procedures Manual. Annual staff training includes the topic of behavioral support at the beginning of each school year, where these policies are reviewed. | |
| **Description of Internal Monitoring Procedures:**  Evidence of knowledge of, training, and review of this Reed Academy Policy and Procedure will be reviewed and noted in mandatory staff training. The program directors will oversee, train, follow up, and ensure that all information/records/and staff are continually following policy and procedures regarding student separation resulting from behavior support and always gain principal approval for student separation resulting more than 30 minutes. Review of student records regarding this policy is consistently monitored, reviewed, and discussed at staffing. Consistent staff check ins for understanding and compliance will be regularly made regarding this policy. The program director will periodically review the time out data to ensure that the names of the staff who monitored the student during the time out is documented and feedback is provided to the appropriate staff. By use of this review and feedback, Reed Academy will be able to direct training and to ensure on-going compliance. | |
| **CORRECTIVE ACTION PLAN APPROVAL SECTION** | |
| **Criterion:**  PS 9.1(a) Student Separation Resulting from Behavior Support | **Corrective Action Plan Status:** Approved  **Status Date:** 10/07/2020  **Correction Status:** Not  Corrected |
| **Basis for Decision:** | |
| **Department Order of Corrective Action:** | |
| **Required Elements of Progress Report(s):**  The program must provide evidence of training all staff on the Student Separation Resulting from Behavior Support policy and procedures by submitting 1) the name and job title of the person conducting the training; 2) the dates and times when this training was held; 3) the length of time of the training; 4) a list of all staff in alphabetical order by last name with their position title; and 5) for any staff who did not receive the training, the reason why and when their training is scheduled. | |
| **Progress Report Due Date(s):**  10/28/2020 | |

PROGRAM REVIEW CORRECTIVE ACTION PLAN

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| **Criterion & Topic:**  PS 11.5 Related Services Staff | | **PR Rating:**  Partially Implemented |
| **Department Program Review Findings:**  A review of documentation indicated that copies of related service providers credentials and licenses were not provided as required. | | |
| **Description of Corrective Action:**  All staff providing or supervising the provision of related services (including medical personnel identified in criterion 16.2 Physician Consultation, 16.3 Nursing, as well as all consultants) will be appropriately certified, licensed or registered in their professional areas and such documentation will be uploaded via the security portal. Reed Academy ensures that this information is updated as new license is acquired or renewed. | | |
| **Title/Role(s) of Responsible Persons:**  Mary Crawford, Executive Director | | **Expected Date of Completion:** 02/28/2020 |
| **Evidence of Completion of the Corrective Action:**  All documentation copies of related service providers credentials and licenses of employees at Reed Academy will be scanned, turned into PDF file and uploaded to the DESE security portal as Reed Academy has been directed. | | |
| **Description of Internal Monitoring Procedures:**  Reed Academy will complete regular record review to ensure there will be not oversight by key staff to employee records. Reed Academy administrative staff ensures that they will procur license information from staff and new hires to be kept in records. Reed Academy staff ensures that they will update professional license to their staff record as needed. Reed academy assures that this a component of yearly training as well as new hire training. By use of this review and feedback process, Reed Academy will be able to direct training to ensure on-going compliance. | | |
| **CORRECTIVE ACTION PLAN APPROVAL SECTION** | | |
| **Criterion:**  PS 11.5 Related Services Staff | **Corrective Action Plan Status:** Approved  **Status Date:** 10/07/2020  **Correction Status:** Not  Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  The program must submit a current Related Services Roster for required positions, using the form located in the WBMS Document Library. The program must also submit copies of current certifications, licenses or registrations for each person listed on the Related Services Roster. | | |
| **Progress Report Due Date(s):**  10/28/2020 | | |

PROGRAM REVIEW CORRECTIVE ACTION PLAN

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| **Criterion & Topic:**  PS 11.6 Master Staff Roster | | **PR Rating:**  Partially Implemented |
| **Department Program Review Findings:**  A review of documentation and interviews indicated that the Master Staff Roster did not include all staff positions approved by DESE and did not correspond to the most recently Approved DESE Staffing Plan. For positions that were not previously approved by DESE, a justification was not provided as required. | | |
| **Description of Corrective Action:**  Reed Academy will correct Master Staff Roster to include all staff positions approved by DESE that did not correspond to the most recently Approved DESE Staffing Plan. Reed Academy will also include a justification for positions that were not previously approved by DESE | | |
| **Title/Role(s) of Responsible Persons:**  Mary Crawford, Executive Director | | **Expected Date of Completion:** 02/28/2020 |
| **Evidence of Completion of the Corrective Action:**  Reed Academy met with DESE liaison during site visit and discussed, reviewed, and corrected the Master Staff Roster to include staff positions approved by DESE that did not correspond to the most recently Approved DESE Staffing and also provided justification for positions not previously approved by DESE as noted on the Master Staff Roster.  Evidence of this corrective action is noted on the Master Staff Roster which was reviewed by liaison during site visit and uploaded to the security portal. Such evidence of the revised Master Staff roster will be uploaded to the security portal.  Staff will be trained on effective implementation. | | |
| **Description of Internal Monitoring Procedures:**  Internal monitoring procedures will occur including regular record review and tracking of over site by administrative staff at Reed Academy. By use of this review and feedback, Reed Academy will be able to direct training to ensure on-going compliance. | | |
| **CORRECTIVE ACTION PLAN APPROVAL SECTION** | | |
| **Criterion:**  PS 11.6 Master Staff Roster | **Corrective Action Plan Status:** Approved  **Status Date:** 10/07/2020  **Correction Status:** Not  Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  The program must submit a current Master Staff Roster, using the template found in the WBMS Document Library, that corresponds to the most recently Approved DESE Staffing Plan. For positions that are not approved by DESE, a justification must be provided. | | |
| **Progress Report Due Date(s):**  11/16/2020  01/15/2021  02/03/2021 | | |

03/02/2021