

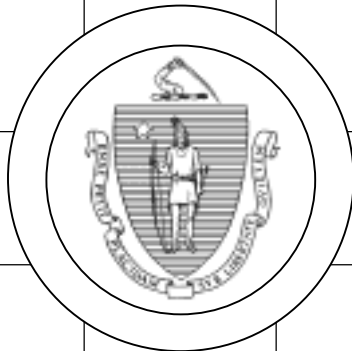


**School Union #69
Lanesborough
Hancock
Richmond**

**COORDINATED PROGRAM REVIEW
REPORT OF FINDINGS**

**Dates of Record Review: February 10 & 11
Dates of Onsite Visit: February 14 - 18
Date of Draft Report: April 5, 2000
Due Date for Comments: April 21, 2000
Date of Final Report: May 26, 2000
Action Plan Due: July 7, 2000**

**Department of Education Onsite Team Members:
Daniel A. Mosco, Chairperson
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**MASSACHUSETTS DEPARTMENT OF EDUCATION
COORDINATED PROGRAM REVIEW**

School Union # 69

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MASSACHUSETTS DEPARTMENT OF EDUCATION

COORDINATED PROGRAM REVIEW REPORT

Mount Greylock Union #69

OVERVIEW OF REVIEW PROCEDURES

As one part of its School and School District Accountability System, the Department of Education oversees local compliance with education requirements through the Coordinated Program Review System. For the 1999-2000 school year, the Department is incorporating for the first time targeted requirements of the Education Reform Act of 1993 in selected District and charter school reviews. Additionally, all reviews will include selected requirements in Special Education (the federal Individuals with Disabilities Education Act (IDEA-97), state Chapter 71B (Chapter 766), and certain federal civil rights requirements under Title VI and Title IX, Section 504 of the Rehabilitation Act of 1973, together with related state requirements under M.G.L., Chapter 76, Section 5 (Chapter 622). Other monitoring activities in the areas of the state's Transitional Bilingual Education law (Chapter 71A), Title I, Safe and Drug-Free Schools and Community Act, the Perkins Vocational and Technical Act, and Nutrition Programs and Services are conducted in some Districts during these Coordinated Program Review procedures. The selected school Districts for 1999-2000 were notified in April 1999 of scheduled visits and were encouraged to implement self assessment activities prior to the arrival of the Department's visiting team.

Coordinated Program Review Elements

Team: Depending upon the size of a school district and the number of program areas to be reviewed, a team of approximately 2-8 Department staff members conducts a Coordinated Program Review over two to five days in a school district or charter school.

Scope: Seventy (70) school districts and charter schools are scheduled to receive visits in school year 1999-2000. All school districts and charter schools in the Commonwealth are monitored through the Department's Coordinated Program Review system on a five-year cycle with an additional mid-cycle follow-up visit. This five-year cycle is coordinated with the Department's District Performance Evaluation Process.

Content: The Program Review criteria encompass the required elements for the specific program areas. In the case of Special Education, the elements selected for the 1999-2000 reviews contain, at a minimum, those required by the federal Office for Special Education Programs (OSEP) and revised requirements included under IDEA-97 as described in the Department's Special Education Advisories issued during the 1997-99 school years. The Program Review compliance criteria selected in all of the regulated program areas are those that are most closely aligned with the goals of the Massachusetts Education Reform Act of 1993 which are intended to promote high standards and achievement for all students.

Report: The Department's report is based on a review of written documentation and data regarding the operation of the District's programs, together with information gathered through the following Department program review methods:

- Interviews of administrative, instructional and support staff across all grade levels;
- School Committee representatives, Parent Advisory Council (PAC) representatives, School Council representatives and other interviews as requested by persons from the general public;
- Student record reviews in the program areas of Special Education, Transitional Bilingual Education, and Perkins Vocational Programs. A sample of student records is selected by the Department. Student records are examined first by local staff and then verified by the Onsite Team using standard Department student record review procedures in order to make determinations regarding the implementation of procedural and programmatic requirements. Parents of students who are selected for the record review are provided an opportunity to be interviewed or, if desired, to complete a written questionnaire;
- Classroom and Facilities Observation: A sample of instructional classrooms and school facilities used in the delivery of programs and services are visited to determine general levels of compliance with program requirements; and
- Collaborative Programs and Services: Where the District is a member of a collaborative approved by the Department of Education and the District serves as a site for any programs or services operated by the collaborative, a sample of interviews, student record reviews and classroom and facility observations are conducted.

Response: An Executive Summary and detailed findings for each program area describe determinations about the implementation status of each requirement (Criterion) reviewed. The findings also note those criteria the implementation of which the Team found to be commendable. For those criteria not found to be fully implemented, the local District or charter school must propose corrective actions to bring those areas into compliance with respective statutes or regulations. Districts are encouraged to incorporate the corrective action activities into their District and School Improvement Plans, including the District Professional Development Plan.

The Department of Education believes that the Coordinated Program Review process is a positive experience and that the Final Report should be seen by the general public as a helpful planning document for continuing development of programs and services in the school district or charter school.

REPORT INTRODUCTION

A two member Massachusetts Department of Education team visited the School Union # 69 during the week of February 14, 2000 to evaluate the implementation of selected criteria in the program areas of Special Education, Civil Rights Methods of Administration (MOA) and Safe and Drug Free Schools. The Team appreciated the opportunity to interview staff and parents, observe classroom facilities and to review the program efforts underway in the District. The Review Team would like to commend the following program areas that were brought to the attention of the Department and that the Team believes have a significant and positive impact on the delivery of educational services for students enrolled in the Mount Greylock Union # 69 School District. These areas are as follows:

The team found that the following procedural and programmatic efforts have a significant and positive effect on the delivery of services to students in the district:

1. *A summary of the TEAM meeting is developed by the chairperson and is attached to the IEP to provide information to educators and parents as to the development of the IEP.*
2. *The Director of Special Education has recognized the necessity to improve the effectiveness of the pre-referral process and has begun programs to properly train and support all teaching staff to this end..*
3. *The provision of "front end service," especially in Lanesborough, for those Pre-K and primary grade learners who have been identified as needing services for speech and language, occupational therapy, and reading is particularly effective.*
4. *Lastly, it was clear to the Onsite Team that there exists an especially strong commitment at all administrative and instructional levels in the district to provide the best possible service to children in the district whom they serve.*

Some of the areas of commendation noted above are additionally stated within the body of the Department's report under the respective compliance criteria

The Department is submitting the following Coordinated Program Review Report containing findings pursuant to this onsite visit study. This report was prepared as a result of the review of extensive written documentation and data regarding the operation of the District's programs, together with information gathered from the following Department program review methods:

- Interviews of 5 administrative staff;
- Interviews of 13 teaching and support services staff across all levels;
- Interviews of 4 School Committee representatives, Parent Advisory Council (PAC) representatives, School Council representatives and other interviews as requested by persons from the general public;
- Student Record Reviews: A sample of 12 student records was selected by the Department. Student records were examined first by local staff and then verified by the onsite team using standard Department of Education student record review procedures in order to make determinations regarding the implementation of procedural and Programmatic requirements; and
- Classroom and Facilities Observation: A sample of 9 instructional classrooms and school facilities used in the delivery of programs and services was visited to determine general levels of compliance with program requirements.

The report addresses findings for ten components listed in the Executive Summary on the following pages in each program area reviewed that are most directly related to the teaching and learning of students. The findings for each program area describe determinations by the Team about the implementation status or "Rating" for each criterion reviewed. The findings note those criteria which were found by the Team to be substantially "Implemented" or implemented in a "Commendable" manner. (Refer to the "Definition of Terms For Ratings" section of the report.) For those criteria found to be either "Partially Implemented" or "Not Implemented," the District or charter school must propose to the Department corrective actions to bring those areas into compliance with the related statute or regulation. In some instances the Team may have found certain requirements to be fully "Implemented" and has made specific "Comment" on the District's implementation methods which also may require response from the District or charter school. Districts are expected to incorporate the corrective action activities into their District and School Improvement Plans, including the District Professional Development Plan.

COORDINATED PROGRAM REVIEW REPORT

School Union # 69

EXECUTIVE SUMMARY

The following information synthesizes the findings for specific program criteria included in the Coordinated Program Review as they respond to essential questions which the Department has formulated for each of the major component areas of the report. Note that a more detailed discussion of the Onsite Team's findings, which are represented in this Executive Summary, together with the specific legal standards for each program area included in this review, follows this summary.

Component I: Assessment of Student Progress

Has the Union implemented an assessment system that uses appropriate instruments, conducted according to the specified timelines and covering the appropriate content areas to determine instructional needs of students?

The Union has implemented a comprehensive assessment program to ensure that students with disabilities are properly identified and served. As a result of its review of records, the onsite team noted that the keeping and tracking of quarterly reports in the student's file are inconsistent and the documentation of amendments to IEPs are incomplete, especially for primary grade student IEPs.

The onsite team found that the regulatory timelines have been implemented consistently, which has led to a timely delivery of appropriate services to students. The Union does have successful liaison with an area agency serving students in an early intervention program. The Union provides progress reports in the same cycle as report cards (a trimester schedule); these reports are well designed and executed with clear narratives addressing specific goals and objectives.

The Coordinated Program Review indicated that there is compliance in nearly all aspects of the assessment process: those criteria rated as partially implemented by the onsite team are easily addressed. The leadership and enthusiasm provided by the new administrator of special education should enable the Union to rectify many issues of non-compliance.

Component II: Student Identification and Program Placement

Has the Union followed procedures for student identification and placement into the program according to the criteria specified in regulations?

The Lanesborough Elementary School conducts a well-documented and comprehensive screening of three and four-year-old children and of children about to enter kindergarten. There was no documentation as to screening by the Richmond and Hancock Schools. The Union, most notably at Lanesborough, implements commendable practice in identifying and providing services to young children, often before age three, to ensure continuity of service from early intervention programs. Outreach to the general public and community groups, needed to ensure all eligible children are reached, should be better documented.

Documentation and interviews indicated efforts to improve the effectiveness of the pre-

referral process with the goal of providing services to identified students in the least restrictive environment. School representatives to encourage parental involvement in the decision-making process. This commitment is evidenced by the inclusion with the IEP sent to the parents of a copy of the meeting notes taken by the TEAM Chairperson to assist them in making informed decisions.

Documentation and interviews indicated the Union's initiative to close any gaps in the continuum of services by adding another school adjustment counselor and arranging full-time access to an occupational therapist. The Union has been committed to providing specialized materials or assistive technology in a timely manner.

The review of documentation and interviews indicated the lack of a systematic evaluation and identification process for limited English proficient students. Additionally, the Union has no policy or programs for pregnant teens.

Component III: Parental Involvement

Has the Union ensured that parents are notified, in the appropriate language, and are involved in decisions regarding their children's programs and services?

The Union does provide notice to parents regarding referral, evaluation and TEAM meetings. The record review indicated inconsistent documentation that parents are provided copies of the mandated procedural safeguards. However, interviews of staff and parents validated that the process is compliant with the regulation. Parents regularly attend TEAM meetings and are involved in their child's educational program. A number of parent respondents indicated that they do believe their ideas and input are truly considered by the Union.

The documentation review and interviews indicated that although the Union has a DARE office in each of the three schools there is no inter-community coordination for the implementation of drug and alcohol prevention programs. Additionally, documentation and interviews did not demonstrate that the Union's Safe and Drug Free program is enriched and informed by regional and state resources.

Interviews and the documentation provided did not show the existence of a viable and functioning Safe and Drug Free Schools Advisory Council. Notably absent from the council are outside medical or health professionals, non-faculty parents, and business, state or county representatives. No documentation was provided that the advisory council has involvement in every stage of the grant process.

Component IV: Curriculum and Instruction

Does the Union hold all students to high expectations and standards and ensure that programs are designed to maximize student performance within regular education and are implemented according to the specific regulatory requirements with respect to learning time, class size, staffing ratio, and age spans? Has the Union provided for coordination across program areas?

Interviews with all constituencies within the Union indicated that the Union holds students to high expectations and seeks to provide programs to maximize student performance. The Union provides a range of programs and services to students with special needs, from full inclusion to individual and small group "pull-out" instruction to substantially separate classes. It supports a range of out of Union placements. The Coordinated Program Review revealed full adherence to the required group size and age span requirements in all programs serving students in all prototypes.

The onsite team recognized the recent initiative to strengthen and support the pre-referral process through training of both regular and special education teachers. However, interviews and record reviews indicated that previous pre-referral strategies were limited and were not always used in an effective or timely manner. There were indications that some staff members have been more willing to attempt modifications than others, leading to inconsistent opportunities for students to stay in the regular education setting. The onsite team found inconsistent and inadequate documentation of the pre-referral efforts.

Documentation and interviews indicated that the Union's practices and policies with respect to the access of students to extracurricular activities are non-discriminatory.

Documentation review and interviews of parents and staff members indicated that the Union's Safe and Drug Free Schools activities do not integrate the fiscal and programmatic goals of other federally funded programs in which the Union is involved.

Component V: Student Support Services

Has the Union ensured that all students have equal opportunity and access to programs or services?

The Union does provide full inclusion for many students, in addition to a variety of pullout classroom models. The Coordinated Program Review revealed compliance with the requirements that all students within the Union have full access to the general curriculum. The new professional development plan incorporates an emphasis on consistency across academic disciplines, including special education, to maximize learning outcomes for all students.

The Union provides procedural safeguards to students with special needs who are involved in disciplinary infractions requiring suspension beyond ten days. The onsite team found that there is coordination between principals and the special education administration to ensure students receive procedural protections when suspension is required.

The onsite team found that the policy and procedures with respect to grievances by students and staff of civil rights violations are insufficiently disseminated throughout the Union. Interviews revealed that not all teachers and administrators are aware of the grievance process. Review of documentation and interviews indicated that the policies and procedures for students' grievances are not well documented. The Union needs to provide direction and leadership to the communities within its jurisdiction in the areas of civil rights training for staff and the distribution of policies to students, parents, and the community at large.

There was no documentation provided to demonstrate that the 7th and 8th grade students at the Richmond Consolidated School receive the appropriate counseling and information regarding occupational /vocational programs. Documentation and interviews did not evidence efforts by the Union to ensure that all counseling materials and activities are free from bias and stereotypes.

The Union leadership needs to assume a greater role in the development and implementation of training on civil rights responsibilities by each of the three communities within Union #69.

Component VI: Faculty, Staff and Administration

Does the Union maintain certified staff in the specific program areas, provide supervision of aides and tutors, and provide ongoing professional development?

The Union maintains certified staff in the specific program areas reviewed. Interviews and documentation indicated that there is now a greater effort to provide an ongoing program of professional development for all staff, including para-professionals, than in the past. Evidence of training programs for existing staff and new hires centering on civil rights responsibilities was not submitted for review, and their existence was not validated through interviews.

Based on the documentation presented the Union needs to revise its current employment application forms and procedures to conform to all regulatory requirements.

Component VII: School Facilities

Does the Union maintain facilities that are conducive to learning, facilitate integration, and provide equal access and opportunity for students to achieve?

While the onsite team was present, the Union was in the midst of a program of remodeling and retrofitting existing instructional spaces in the Richmond Consolidated School to ensure accessibility to all students. Observations indicated that the Lanesborough Elementary School is not accessible to all students. However, during the review week the Union reported that a bid for the construction of a new school was accepted, with preliminary site work to begin during spring 2000. Observations and interviews indicated that some spaces used for the delivery of special education at the temporary quarters of the Richmond Consolidated School are not equal in all respects to those used for regular education.

Component VIII: Program Plan and Evaluation

Does the Union have written program plans that are evaluated according to specific regulatory requirements? Do parents have opportunities for input on needs, program implementation, evaluation, and improvement?

The documentation reviewed indicated that the Union does assess the effectiveness of its inclusion program through parent questionnaires. However, it did not appear that the Union uses other available data in conjunction with the information from the questionnaires to determine the effectiveness of special education programs.

The documentation and interviews indicated that the Union does not have a regular process of self-evaluation to examine whether or not its policies discriminate or limit educational access due to race, color, sex, religion, national origin, sexual orientation or disability.

The Union provided no documentation that a formal process exists to review existing or new curriculum materials to ensure their presentation of fair perspectives of the culture, history, activities, and contributions of persons or groups of different races, nationalities, sexes, or colors.

Documentation and interviews indicated that the Union does not develop an objective needs assessment of its Safe and Drug Free Schools program in compliance with the regulatory requirements. Consequently, it is not possible for the Union to develop measurable objectives for the program to aid in planning and to promote effectiveness. According to the documentation submitted for review, the Union has not specified measurable objectives for programs or activities nor established a means of evaluating the effectiveness of such initiatives.

Component IX: Record keeping

Does the Union maintain required records and documentation for each specific program area?

The documentation presented demonstrated that the Union does keep a student register with all the required elements. However, the data in the registers is inconsistent with data submitted to the Department of Education, with the federal child count, and with the School Summary Report.

The Union did not provide any documentation as to how the expenditures for its Safe and Drug Free Schools program support the proposal for funds that it has submitted to the Department of Education. There were no logs of expenditures to indicate whether the Union distributed funds according to the submitted grant objective.

DEFINITION OF TERMS
FOR THE RATING OF EACH COMPLIANCE CRITERION

Commendable	Any requirement or aspect of a requirement implemented in an exemplary manner significantly beyond the requirements.
Implemented	The requirement or criterion is substantially met.
Partially Implemented	The requirement, in one or several important aspects, is not entirely met.
Not Implemented	The requirement is totally or substantially not met.
Not Applicable	The requirement does not apply to the school district or charter school.

COMPONENT I: ASSESSMENT OF STUDENT PROGRESS

The criteria in this component examine whether the District has implemented an assessment system that uses appropriate instruments, conducted according to the specified timelines and covering the appropriate content areas to determine instructional needs of students for the program areas listed below:

- Special Education (Report Issues # SE 1- SE 11)

CRITERION NUMBER	SPECIAL EDUCATION I. ASSESSMENT OF STUDENT PROGRESS
	Legal Standard
<p style="text-align: center;">SE 1</p>	<p>Assessments are appropriately selected and interpreted</p> <ol style="list-style-type: none"> 1. Tests and other evaluation materials are: <ol style="list-style-type: none"> a. validated b. administered and interpreted by trained individuals c. tailored to assess specific areas of educational need d. selected and administered to reflect aptitude and achievement levels e. as free as possible from cultural and linguistic bias f. provided in the student's native language or other mode of communication where feasible g. not the sole criterion for determining an appropriate educational program h. not only those designed to provide a single general intelligence quotient i. are selected and administered to ensure that when a test is administered to a student with impaired sensory, manual, or speaking skills, the test results accurately reflect the student's aptitude or achievement level or the other factors the test purports to measure j. technically sound instruments that may assess the relative contribution of cognitive and behavioral factors, in addition to physical or developmental factors. 2. In interpreting evaluation data and making decisions, the District: <ol style="list-style-type: none"> a. uses information from a variety of sources to gather relevant functional and developmental information, including information provided by the parent. b. ensures that information obtained from these sources is considered. c. ensures that the placement decision conforms with placement in the least restrictive environment. d. includes information related to enabling the student to be involved in and progress in the general curriculum or, for preschool children, to participate in appropriate activities. <p>State Regulations 320.1(a-i)</p> <p style="text-align: right;">Federal Requirements 20 U.S.C. Chapter 33, Section 1414(b)(2)</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">SE 3</p>	<p>Transition</p> <p>a. For a student who is 14 years of age, the TEAM must consider the student’s course of study in relation to the student’s future goals and document this in the IEP.</p> <p>b. For a student who is 16 years of age, or younger if appropriate, the TEAM develops a Statement of Needed Transition Services that promotes movement of the student from school to post-school activities, including post-secondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation.</p> <p>c. The Statement of Needed Transition Services is based upon the student's needs, taking into account the student's preferences and interests and includes specially designed instruction, community experiences, the development of employment or other post-school adult living objectives, and, if appropriate, the acquisition of daily living skills and functional vocational evaluation.</p> <p>d. Beginning at least one year before the student reaches 18, the age of majority under Massachusetts state law, the student is informed of transfer of rights on reaching the age of majority.</p> <p>e. Where a student is graduating or turning age twenty-two and in need of continuing services, the appropriate transitional agency is notified and invited to participate in TEAM meetings at least two years before the anticipated date of exit.</p> <p>f. In cases where the IEP included needed transition services and a participating agency other than the school district fails to provide these services, the TEAM reconvenes to identify alternative strategies to meet the transition objectives.</p> <p>State Regulations 314.,335.4, 132.0 Chapter 688</p> <p style="text-align: right;">Federal Requirements IDEA-97</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
<p>SE 4</p>	<p>TEAM composition The following persons are members of the evaluation TEAM:</p> <ul style="list-style-type: none"> a. A representative of the school district who acts as Chairperson and who is (1) qualified to supervise or provide special education; (2) is knowledgeable about the general curriculum; and (3) is knowledgeable about the availability of resources of the District. b. A representative of the school district who has the authority to commit the resources of the District (and who may act as the Chairperson) c. A teacher who has recently had or currently has the student in a classroom or other teaching situation. If the student is involved or may be involved in a regular education program, a regular education teacher should be included as a TEAM member. d. The student, age fourteen and older, if he/she chooses e. The parent f. Other individuals at the request of the student's parents g. At least one teacher or specialist trained in the area of the student's suspected special needs h. The individuals who have conducted assessments as part of the evaluation (A registered nurse may represent a physician for the comprehensive health assessment) i. Other individuals who may be necessary to write an IEP for the child, as determined by the Administrator of Special Education j. When one purpose of the TEAM meeting is to discuss transition services, the student age sixteen, or younger, is a part of TEAM process. If the student does not attend the TEAM meeting, the school district ensures that the TEAM is informed of the student's interests and preferences k. When one purpose of the TEAM meeting is to discuss transition services, a representative of any public agency who may be responsible for providing or paying for transition services is invited to the TEAM meeting. If the representative(s) does not attend the meeting, the school district takes other steps to obtain the participation of these agencies. <p>State Regulations 314.1-314.7</p> <p style="text-align: right;">Federal Requirements IDEA-97</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER					
	Legal Standard				
SE 5	<p>Eligibility determination: Timelines for evaluation, provision of IEP and/or identification of other needed instructional programs</p> <p>1. Within forty-five school working days after receipt of the parent's written consent to an initial evaluation or re-evaluation, the School district:</p> <ul style="list-style-type: none"> a. provides an evaluation b. convenes a TEAM meeting c. determines whether the student (1) has a disability and (2) by reason of that disability, requires special education in order to make progress in education d. develops an IEP where the student is found to need special education e. provides the parent with two copies of the proposed IEP, or a written explanation of the finding of no eligibility. <p>2. If a TEAM determines that a student's lack of progress is due to a lack of instruction in reading or math or limited English proficiency, the student is determined by the TEAM to be ineligible to receive special education and is referred to a more appropriate instructional program.</p> <p>3. Where a TEAM finds students only in need of "monitoring services", such students are found not eligible for special education and are supported through the District's regular education program..</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations</td> <td style="width: 50%;">Federal Requirements</td> </tr> <tr> <td>319.0</td> <td>20 U.S.C. Chapter 33, Section 1414(b)(5)</td> </tr> </table>	State Regulations	Federal Requirements	319.0	20 U.S.C. Chapter 33, Section 1414(b)(5)
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Rating: Implemented	District Response Required: No				

CRITERION NUMBER					
	Legal Standard				
SE 6	<p>End of school year evaluations</p> <p>If consent is received within thirty to forty-five school working days before the end of the school year, a TEAM meeting is scheduled to allow for the provision of a proposed IEP or finding of no special needs within fourteen calendar days of the end of the school year.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations</td> <td style="width: 50%;">Federal Requirements</td> </tr> <tr> <td>319.0</td> <td>IDEA-97</td> </tr> </table>	State Regulations	Federal Requirements	319.0	IDEA-97
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CRITERION NUMBER	
	Legal Standard

CRITERION NUMBER	
	Legal Standard
SE 7	School District response to request for independent evaluation The school district responds in writing within five school working days when a parent requests an independent evaluation at school district expense. State Regulations Federal Requirements 328.2
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
SE 8	Frequency of re-evaluation Re-evaluations of each student in need of special education occur at least every three years, and more frequently if requested by the student's parent or teacher, or if recommended by a participant in a review meeting. State Regulations Federal Requirements 334.0 IDEA-97
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
SE 9	Progress Reports and content a. Parents receive reports on the student's progress toward reaching the goals set in the IEP at least as often as parents are informed of the progress of non-disabled students.

CRITERION NUMBER	
	Legal Standard
	<p>b. Progress report information sent to parents includes narrative information on the student’s progress toward the annual goals in the IEP, including information on the extent to which such progress is sufficient to enable the child to achieve the goals by the end of the year.</p> <p>State Regulations 335.1, 502.13</p> <p>Federal Requirements 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)(viii)</p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

The records reviewed indicated that progress reports are not consistently being sent to parents three times per year in keeping with the trimester schedule . However, based on parent and staff interviews it was the opinion of the Onsite Team that the record keeping does not accurately reflect the consistency with which parents are receiving the trimester reports. The progress reports which were in evidence properly presented detailed narratives addressing the progress toward the annual goals in the IEP.

CRITERION NUMBER	
SE 11	Legal Standard
	<p>Annual Review of student progress</p> <p>a. At least annually, on or before the anniversary date of the implementation of the IEP, a TEAM meeting (including the major service providers and the parent) is held to consider the student’s progress and to review, revise, or develop a new IEP or refer the student for a reevaluation, as appropriate.</p> <p>b. Within ten days of the meeting, the school district provides the required notice and seeks the consent of the parent for a reevaluation or a new or amended IEP.</p> <p>State Regulations 333.0, 333.1, 333.5, 333.6</p> <p>Federal Requirements IDEA-97</p>
	<p>Rating: Implemented District Response Required: No</p>

COMPONENT II: STUDENT IDENTIFICATION AND PLACEMENT

The criteria in this component examine whether the district has followed procedures for student identification and placement into the program according to the criteria in regulations for the program areas listed below:

- Special Education (Report Issues # SE 13A-22)
- Civil Rights Methods of Administration (MOA)
(Report Issues # MOA 4, 5, 10-13)

CRITERION NUMBER	SPECIAL EDUCATION II. STUDENT IDENTIFICATION AND PLACEMENT	
	Legal Standard	
SE 13A	<p>Outreach by the School District The district has annual or more frequent outreach and continuous liaison with those groups below from which promotion or transfer of students in need of special education may be expected, or which would include students in need of special education:</p> <ul style="list-style-type: none"> a. professionals in community b. private nursery schools c. day care facilities d. group homes e. parent organizations f. clinical /health care agencies g. early intervention programs h. other public/private/parochial schools i. other agencies/organizations <p>State Regulations 304.7 304.8</p> <p>Federal Requirements 20 U.S.C. Chapter 33, Section 1412(a)(3)(A)</p>	
	Rating: Partially Implemented	District Response Required: Yes

Department of Education Findings:

According to the documentation presented and the interviews conducted it was clear that the Union does not maintain frequent outreach and continuous liaison with all required community groups and organizations.

CRITERION NUMBER		
	Legal Standard	
SE 13B	<p>Screening</p> <p>a. The school district makes provision for annual registration, optional on the part of the parent, of all children of ages 3 and 4, including the following:</p> <ol style="list-style-type: none"> 1. parents are notified of the registration 2. parents are given information on purpose and availability of orientation sessions and screening for their children 3. parents are requested (not required) to submit a copy of the most recent physical and other relevant information 4. information for parents is in their primary language 5. interpreters are available at the time of registration; <p>b. Screening instrument for three and four year olds is comparable in content to the kindergarten entry screening, is adapted as necessary to be appropriate, and is optional on the part of parents of such children;</p> <p>c. Screening instrument for kindergarten includes all required areas:</p> <ol style="list-style-type: none"> 1. developmental history 2. medical history (by physician) 3. vision 4. hearing 5. visual, auditory, and motor functioning 6. language functioning in English and in student's primary language when other than English; <p>d. Screening instrument is as free as possible from cultural and linguistic bias, and is provided in the student's native language or other mode of communication where feasible.</p> <p>e. Kindergarten screening is held no later than October 31 of each year;</p> <p>f. Provision is made for ongoing and periodic screening of all students;</p> <p>g. Parents are informed of the results of the screening and of the opportunity upon request of the parents to discuss those results with the appropriate personnel.</p> <p>State Regulations 306.0, 306.1(a-f), 320.1(e, f), 306.2, 307.0 308.0, 304.1, 304.1(a), (b), 203.0</p>	<p>Federal Requirements IDEA-97</p>
	Rating: Partially implemented	District Response Required: Yes

Department of Education Findings:

Each of the three schools completes its own screening of 3 and 4 year old and kindergarten children. However, the process and its results were best documented and most evident at the Laneshorough Elementary School. At the Hancock and Richmond Consolidated School there was no documentation provided which described the district's efforts under this criterion in this school.

CRITERION NUMBER			
	Legal Standard		
SE 14	<p>Services start by child's third birthday</p> <p>a. The school district accepts in a timely manner referrals from such persons and agencies, as stated in Criterion 11.3, in order to ensure that if a child is determined to need special education, the IEP is implemented by the date of the child's third birthday.</p> <p>b. The district implements procedures to ensure the effective transition of young children with disabilities from Early Intervention Programs through participation in transition planning conferences arranged by such programs.</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> State Regulations 304.7 304.8 </td> <td style="width: 50%; vertical-align: top;"> Federal Requirements 20 U.S.C. Chapter 33, Section 1412(a)(9) </td> </tr> </table>	State Regulations 304.7 304.8	Federal Requirements 20 U.S.C. Chapter 33, Section 1412(a)(9)
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Rating: Partially Implemented	District Response Required: Yes		

Department of Education Findings:

Documentation and interviews failed to provide evidence that all of the elements of this criterion are met in each of the three schools.

CRITERION NUMBER			
	Legal Standard		
SE 15	<p>Students 16-21 informed of their program options</p> <p>The School district advises (in writing with a copy to parents) students age 16-21 who have left or are about to leave school without obtaining a high school diploma or its equivalent the following:</p> <p>a. their attendance is voluntary</p> <p>b. their rights under these regulations</p> <p>c. all program options available to them.</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> State Regulations 207.0-207.2 </td> <td style="width: 50%; vertical-align: top;"> Federal Requirements </td> </tr> </table>	State Regulations 207.0-207.2	Federal Requirements
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	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">Rating: Implemented</td> <td style="width: 50%; text-align: right;">District Response Required: No</td> </tr> </table>	Rating: Implemented	District Response Required: No
Rating: Implemented	District Response Required: No		

CRITERION NUMBER	
	Legal Standard
SE 17	<p>TEAM develops the IEP containing required elements. The IEP may not be changed at a higher administrative level within the school district</p> <p>a. If the TEAM determines that the student has a disability and requires special education and/or related services, based upon the evaluative data, the TEAM then develops at that meeting an IEP that includes the elements in the Massachusetts Mandated IEP Forms (IEP, IEP Amendment, Recommendation for Diagnostic Evaluation, Statement of Needed Transition Services--1994 versions and 1998 Addendum to the IEP) .</p> <p>b. The school district ensures that each IEP TEAM has at least one person with authority to commit the resources of the district and that whatever services are set out in the IEP will actually be provided and that the IEP will not be changed at a higher administrative level within the district.</p> <p>State Regulations Federal Requirements 20 U.S.C. Chapter 33, Section 1414(c) and (d)</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 18	<p>Least restrictive prototype selected</p> <p>a. The prototype and program selected is the least restrictive environment for students, with consideration given to any potential harmful effect on the student or on the quality of services which he or she needs.</p> <p>b. The TEAM states the basis for its conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily.</p> <p>State Regulations Federal Requirements 500.0 IDEA-97</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 21	<p>Accepted services are immediately provided Where the IEP of the student in need of special education has been accepted in whole or in part by that student's parent, the school district immediately provides the mutually agreed upon services.</p> <p>State Regulations 330.1, 325.2</p> <p style="text-align: right;">Federal Requirements IDEA-97</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 22	<p>Specialized materials and assistive technology</p> <p>a. Specialized materials and equipment specified in IEPs are provided, are of good quality and are suitable for the role they play in the IEP.</p> <p>b. School district provides evidence that assistive technology is considered for each eligible student and, if necessary, described in the IEP and provided by the district.</p> <p>State Regulations 507.0</p> <p style="text-align: right;">Federal Requirements IDEA-97</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION II. STUDENT IDENTIFICATION AND PLACEMENT
	Legal Standard
MOA 4	<p>Identification of limited English proficient students The district uses qualified staff and appropriate procedures and assessments to annually classify and evaluate students who are limited English proficient and who</p>

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION II. STUDENT IDENTIFICATION AND PLACEMENT
	Legal Standard
	need special language assistance. Title VI; MGL, Ch.76, Section 5
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

According to documentation provided and the interviews conducted it was clear that no consistent policies and procedures exist to identify limited English proficient students.

CRITERION NUMBER	
	Legal Standard
MOA 5	Placement and program modification for limited English proficient students For students requiring special language assistance, the district makes necessary program modifications to effectively serve limited English proficient students. Title VI; MGL, Ch.76, Section 5
	Rating: Implemented District Response Required: No

Department of Education Findings:

At present there are no limited English proficient students in the Union.

CRITERION NUMBER	
	Legal Standard
MOA 10	Access to a full range of education programs All students in grades 7-12, including linguistic and/or racial and ethnic minorities, males/females and students with disabilities, have access to the general education program and the full range of any occupational/vocational education programs offered by the district. Title II, Title VI, Title IX, S. 504, MGL, Ch.76, Section 5
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard

CRITERION NUMBER	
	Legal Standard
MOA 11	<p>Placement of linguistic, racial minority and female/male students Placement patterns for linguistic and/or racial minority students and for females/males are consistent with placement patterns for majority students in special education and in district ability groupings and tracking; enrollment in honors courses such as math and science are inclusive of females and representatives from diverse ethnic and cultural groups. Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
MOA 12	<p>Placement of disabled students in occupational/vocational education programs When occupational/ vocational placement needs of disabled students are being considered:</p> <ul style="list-style-type: none"> a. persons knowledgeable about a student’s disabilities are present at 504 or special education TEAM meetings and participate in ongoing communication regarding a student’s progress b. an array of occupational/vocational education programs and services are available to facilitate necessary program modifications and to meet the identified needs of students <p>Title II, S. 504</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
MOA 13	<p>Availability of in-school programs for pregnant students Pregnant students are permitted to remain in regular education classes and participate in extracurricular activities with non-pregnant students throughout their pregnancy,</p>

CRITERION NUMBER	
	Legal Standard
	and after giving birth are permitted to return to the same academic and extracurricular program as before the leave. Title IX
	Rating: Not Implemented District Response Required: Yes

Department of Education Findings:

Although requirements under this criterion have not yet been required to be implemented by the district, the school system has no established policies and procedures to implement this standard.

COMPONENT III: PARENTAL INVOLVEMENT

The criteria in this component examine whether the district has ensured that parents are notified, in the appropriate language, and are involved in decisions regarding their children’s programs and services for the program areas listed below:

- Special Education (Report Issues # SE 23-32)
- Civil Rights Methods of Administration (MOA) (Report Issue # MOA 3)

- Safe and Drug Free Schools (Report Issues # SDF 1-3)

CRITERION NUMBER	
	Legal Standard
	meeting at a mutually agreed upon time and place; and documents such efforts. If neither parent can attend, the district shall use other methods to ensure parent participation. State Regulations 321.1
	Federal Requirements IDEA-97
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
SE 26	Content of TEAM meeting notice to parents The notice of any TEAM meeting states the purpose, time and location of the meeting as well as who will be in attendance. State Regulations 321.1
	Federal Requirements IDEA-97
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
SE 27	Parent provided the IEP with notification of procedural safeguards and parents' rights Within 10 days of the TEAM meeting, the school district sends the parents the proposed IEP or a written explanation of the finding of no special needs, including a list of the meeting participants, an explanation of the results of the evaluation and the required parental notice of rights. State Regulations 324.0, 333.6
	Federal Requirements IDEA-97
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

While staff interviewed indicated that requirements under this criterion are implemented, there was inconsistent documentation of this required correspondence in student records.

CRITERION NUMBER	
	Legal Standard
SE 28	<p>Communications are in English and primary language of home Communications are in both English and the primary language of the home if such primary language is other than English. Any interpreter used in fulfilling these requirements is fluent in the primary language of the home. If the parents or the student are unable to read in any language or are blind or deaf, communications required by these regulations are made orally in English with the use of a foreign language interpreter, in Braille, in sign language, via TTY, or in writing, whichever is appropriate, and that all such communications are documented.</p> <p>State Regulations 203.2, 203.3 300.9</p> <p>Federal Requirements IDEA-97</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 29	<p>Notice to parents Notice is provided to parents, and to the student if age eighteen or older, on the required occasions, including but not limited to:</p> <ul style="list-style-type: none"> a. proposal to conduct an initial evaluation, re-evaluation or emergency evaluation b. offer of a new or amended IEP c. finding of no special needs d. suspension or exclusion of a student with special needs for more than ten cumulative days in the school year e. any proposed change of placement f. consideration of transition services, including notice that the student will be invited and any agency that will be invited to send a representative g. termination of services, including graduation from high school before age twenty-two <p>State Regulations 317.1(a)</p> <p>Federal Requirements IDEA-97</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER			
	Legal Standard		
SE 30	<p>Elements of notice to parents The notice contains all required elements included the Massachusetts Parent's Rights Brochure, including the Department's October 1997 Supplement.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>State Regulations 317.2(a-m)</p> </td> <td style="width: 50%; vertical-align: top;"> <p>Federal Requirements 20 U.S.C. Chapter 33, Section 1412(a)(10)(C); Section 1412(a)(17); Section 1412(m); Section 1415(d); Section 1415(b)(3); Section 1415(c)</p> </td> </tr> </table>	<p>State Regulations 317.2(a-m)</p>	<p>Federal Requirements 20 U.S.C. Chapter 33, Section 1412(a)(10)(C); Section 1412(a)(17); Section 1412(m); Section 1415(d); Section 1415(b)(3); Section 1415(c)</p>
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	<p>Rating: Implemented District Response Required: No</p>		

CRITERION NUMBER			
	Legal Standard		
SE 32	<p>Written consent obtained before re-evaluation/subsequent placement Written parental consent is obtained before conducting a re-evaluation and before placing a student in a special education placement subsequent to the initial placement.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>State Regulations 208.1, ,334.1,</p> </td> <td style="width: 50%; vertical-align: top;"> <p>Federal Requirements 333.5, 335.2, 320.4</p> </td> </tr> </table>	<p>State Regulations 208.1, ,334.1,</p>	<p>Federal Requirements 333.5, 335.2, 320.4</p>
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	<p>Rating: Implemented District Response Required: No</p>		

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION III. PARENTAL INVOLVEMENT
	Legal Standard
MOA 3	<p>General information and materials in languages other than English When persons with limited English language skills reside in the community, the following are published in language(s) other than English and disseminated to all relevant recipients: general announcements, counseling materials, notices of</p>

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION III. PARENTAL INVOLVEMENT	
	Legal Standard	
	extracurricular activities, and information regarding school recruitment and promotional activities. Title VI; MGL, Ch.76, Section 5	
	Rating: Not Applicable	District Response Required: Yes

Department of Education Findings:

While there are presently no families of Limited English Proficient students residing within the boundaries of the Union, the district does not have a formal process in place to identify new students as they arrive into the district.

CRITERION NUMBER	SAFE AND DRUG FREE SCHOOLS III. PARENTAL INVOLVEMENT	
	Legal Standard	
SDF 1	The local education agency coordinates such agency’s programs and projects with community-wide efforts to achieve such agency’s goals for drug and violence Prevention. [Title IV Sec. 4115 (b) (2) (D)]	
	Rating: Partially Implemented	District Response Required: Yes

Department of Education Findings:

A review of documentation and interviews indicates that the only community services are the police in Lanesboro, and State Police in Richmond and Hancock; three different DARE officers serve the three different schools. In the past the district collaborated with surrounding school districts on shared alcohol and drug abuse issues, also seeking out Berkshire County, Public Health, and medical, counseling, and business resources and individuals. At present there is no inter-community coordination for drug and alcohol prevention.

CRITERION NUMBER		
	Legal Standard	
SDF 2	The local education agency coordinates such agency’s programs and projects with other federal, state, and local programs for drug-abuse and violence prevention, including health programs. [Title IV Sec. 4115 (b) (2) (E)]	
	Rating: Partially implemented	District Response Required: Yes

Department of Education Findings:

A review of documentation and interviews indicated that prevention education is part of a

developmental health education program, and some individuals are providing conflict resolution programs in the schools largely on their own initiative. However, there is no evidence of a coordinated Safe and Drug Free Schools program across the school union that is enriched and informed by regional and state resources.

CRITERION NUMBER	
	Legal Standard
SDF 2A	The Safe and Drug Free Schools Advisory Council is representative of community Agencies. The Council includes parents, students and representatives from the Schools and prevention community. [Title IV Sec. 4115 (b) (2)]
	Rating: Not Implemented District Response Required: Yes

Department of Education Findings:

According to interviews and the documentation provided, the SDFSC Advisory Council of Union 69 has met only once over the past year. It is presently composed of school faculty and administrators and two police officers. There are no outside medical or health professionals, non-faculty parents, or business, state or county representatives on the council. SDFSCA places primary importance on the role of a community advisory council in every stage of development and evaluation of a violence and substance abuse prevention program. The lack of an active advisory council reflects negatively on the implementation of most if not all of the rest of the SDF compliance standards.

CRITERION NUMBER	
	Legal Standard
SDF 2B	There is evidence of an ongoing role for the Advisory Council in program planning and implementation through a comprehensive set of activities.
	Rating: Not Implemented District Response Required: Yes

Department of Education Findings:

The role of the advisory council is not evident. There is no documentation of meetings. Interviews indicated that in each school the faculty plans and implements local program initiatives., The advisory council does not participate in needs assessment, nor determine program goals and objectives nor evaluate the success of program activities. A fully representative council needs to be involved in every stage of the grant process.

CRITERION	
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NUMBER	
	Legal Standard
SDF 3	There are program activities implemented to promote the involvement of parents. [Title IV Sec. 4116 (a)(1)]
	Rating: Partially implemented District Response Required: Yes

Department of Education Findings:

Documentation and interviews indicated that parent involvement in SDFSCA activities is not uniform across the union, and parents from each community are not represented on the Advisory Council.

COMPONENT IV: CURRICULUM AND INSTRUCTION

The criteria in this component examine whether the district holds all students to high expectations and standards and ensures that the program areas reviewed are designed to maximize student performance within regular education and are implemented according to specific regulatory requirements with respect to learning time, class size, staffing ratio, and age spans. The criteria also examine if the district has provided for coordination across the following program areas:

- Special Education (Report Issues # SE 33A-43)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 15-16)
 - Safe and Drug Free Schools (Report Issue # SDF 4)

student needs in regular education prior to referral for special education evaluation.

CRITERION NUMBER	
	Legal Standard
SE 37	Components of the pre-referral Pre-referral efforts may include, but are not limited to, modification of the curriculum, teaching strategies, teaching environments, or materials; and use of support services, and building-based Teams. State Regulations 309.0
	Federal Requirements IDEA-97
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:
Documentation and interviews did not support the conclusion that the pre-referral efforts across the Union include modifications of curriculum, teaching strategies, or methodology.

CRITERION NUMBER	
	Legal Standard
SE 38	Documentation of regular education pre-referral efforts All pre-referral efforts are documented in student records. State Regulations 309.0
	Federal Requirements
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:
The student records reviewed by the Onsite Team did not document the schools' efforts to accommodate student needs in regular education.

CRITERION NUMBER	
	Legal Standard
SE 39	Student/teacher ratios for 502.2 and 502.3 prototype programs

CRITERION NUMBER				
Legal Standard				
	502.2 and 502.3 prototype programs meet the following group size requirements:			
	<u>Staffing Pattern</u>	<u>Number of Students</u>	<u>SPED Administrator approval</u>	<u>DOE Approved waiver</u>
	1 Teacher	8	10	12
	1 Teacher 1 Aide	12	14	16
	1 Teacher 2 Aides	16	18	20
	State Regulations 502.2(b), 502.3		Federal Requirements	
	Rating: Implemented		District Response Required: No	

CRITERION NUMBER				
Legal Standard				
SE 40	Student/teacher ratios for 502.4 prototype programs			
	502.4 prototype programs meet the following class size requirements, which also apply when one or more students in this prototype are receiving special education with students from other prototypes:			
	<u>Staffing Pattern</u>	<u>Number of Students</u>	<u>SPED Administrator approval</u>	<u>DOE Approved waiver</u>
	1 Teacher	8	Not Allowed	10
	1 Teacher 1 Aide	12	Not Allowed	14
	State Regulations 502.4(b)		Federal Requirements	
	Rating: Implemented		District Response Required: No	

CRITERION NUMBER				
Legal Standard				

CRITERION NUMBER																									
	Legal Standard																								
	<table border="0"> <tr> <td>1 Teacher</td> <td></td> <td></td> <td></td> </tr> <tr> <td>1 Aide</td> <td style="text-align: center;">15</td> <td style="text-align: center;">Not Allowed</td> <td style="text-align: center;">17</td> </tr> </table> <p>c. 502.8(c) Separate center-based programs Include more than 50% children with special needs</p> <table border="0"> <tr> <td>Staffing Pattern</td> <td style="text-align: center;">Number of Students</td> <td style="text-align: center;">SPED Administrator approval</td> <td style="text-align: center;">DOE Approved waiver</td> </tr> <tr> <td>1 Teacher</td> <td style="text-align: center;">6</td> <td style="text-align: center;">Not Allowed</td> <td style="text-align: center;">8</td> </tr> </table> <table border="0"> <tr> <td>1 Teacher</td> <td></td> <td></td> <td></td> </tr> <tr> <td>1 Aide</td> <td style="text-align: center;">9</td> <td style="text-align: center;">Not Allowed</td> <td style="text-align: center;">11</td> </tr> </table> <p>State Regulations 502.8(b), 502.8(c)</p> <p style="text-align: right;">Federal Requirements</p>	1 Teacher				1 Aide	15	Not Allowed	17	Staffing Pattern	Number of Students	SPED Administrator approval	DOE Approved waiver	1 Teacher	6	Not Allowed	8	1 Teacher				1 Aide	9	Not Allowed	11
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CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION IV. CURRICULUM AND INSTRUCTION		
	Legal Standard		
MOA 15	<p>Accessibility of extra curricular activities Extra curricular activities sponsored by the district are non-discriminatory in that:</p> <ul style="list-style-type: none"> X the school provides equal opportunity for male and female students to participate in intramural and interscholastic sports X extracurricular activities or clubs sponsored by the school does not exclude students on the basis of race, color, religion, national origin, sexual orientation and disability. <p>Title II; Title IX ; S. 504; MGL, Ch.76, Section 5</p>		
	<table border="0"> <tr> <td style="text-align: center;">Rating: Implemented</td> <td style="text-align: right;">District Response Required: No</td> </tr> </table>	Rating: Implemented	District Response Required: No
Rating: Implemented	District Response Required: No		

CRITERION NUMBER	
	Legal Standard
MOA 16	Promotional, recruitment, and employment practices of prospective employers of students

CRITERION NUMBER	
	Legal Standard
	<p>The district ensures that promotional efforts and recruitment and employment practices and materials aimed at students, including career days, work study, cooperative work experience and apprenticeship training programs, are free of bias and discrimination by:</p> <p>X depicting students from both sexes and under represented groups in all pictorial representations</p> <p>X making clear in written materials that all options are open to students regardless of race, color, sex, religion, national origin, sexual orientation or disability</p> <p>X requiring employers recruiting at the school to sign a statement that they do not discriminate in hiring or employment practices</p> <p>Title I, Title VI, Title IX, S. 504, MGL, Ch.76, Section 5</p>
	<p>Rating: Not Applicable District Response Required: No</p>

Department of Education Findings:

Since the schools are all elementary, MOA 16 does not apply.

CRITERION NUMBER	SAFE AND DRUG FREE SCHOOLS IV. CURRICULUM AND INSTRUCTION	
	Legal Standard	
SDF 4	<p>Local SDFSCA activities (where applicable) are integrated with the following federal programs under IASA and Goals 2000: the Educate America Act: [Title IV Sec. 4115 (c) (2) (B) (iii)]</p> <p>1.</p>	
	Rating: Not Implemented	District Response Required: Yes

Department of Education Findings:

A review of documentation and interviews of staff indicated that the SDF activities are not integrated with other federal programs as required under this criterion.

COMPONENT V: STUDENT SUPPORT SERVICES

The criteria in this component examine whether the district has ensured that all students have equal opportunity and access to programs or services in the program areas listed below:

- Special Education (Report Issues # SE 45-50)
- Civil Rights Methods of Administration (MOA)
(Report Issues MOA 1, 2, 6, 8, 9, 17)

CRITERION NUMBER	SPECIAL EDUCATION V. STUDENT SUPPORT SERVICES	
	Legal Standard	
SE 45	<p>IEP: Discipline Code The IEP indicates if the student is or is not expected to meet the regular discipline code and, if not, what modifications are required.</p> <p>State Regulations 322.11</p>	<p>Federal Requirements</p>
	Rating: Implemented	District Response Required: No

CRITERION NUMBER		
	Legal Standard	
SE 46	<p>Procedure for recording suspensions The district has a procedure to record the number and duration of suspensions, including any suspensions from any part of the student’s IEP program (including transportation).</p> <p>State Regulations</p>	<p>Federal Requirements IDEA-97</p>
	Rating: Partially Implemented	District Response Required: Yes

Department of Education Findings:
While the suspension of students is rarely implemented, the district has no system for recording suspensions as required under this criterion.

CRITERION NUMBER		
	Legal Standard	
SE 47	<p>Procedures for suspension up to 10 days and after 10 days: General requirements</p> <p>a. All students, including students with disabilities, receive prior written notice regarding the school’s Code of Conduct.</p> <p>b. The school’s Code of Conduct includes required procedural safeguards such as opportunity for a hearing (per Goss v. Lopez).</p> <p>c. Any student may be suspended up to 10 days in any school year.</p> <p>d. After a student has been suspended for 10 days in any school year, during any subsequent removal the public school must provide sufficient services for the student to continue to receive a free and</p>	

CRITERION NUMBER	
	Legal Standard
	<p>appropriate public education.</p> <p>e. The school must provide additional procedural safeguards for students with disabilities prior to any suspension beyond 10 consecutive days or more than 10 cumulative days (if there is a pattern of suspension) in any school year. (see SE 48)</p> <p>State Regulations</p> <p>Federal Requirements 20 U.S.C. Chapter 33, Section 1415(k) 34 CFR 300.519-300.529</p>
	<p>Rating: Implemented</p> <p style="text-align: right;">District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 48	<p>Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the TEAM; responsibilities of the district</p> <p>a. A suspension of longer than 10 consecutive days or a series of suspensions that are shorter than 10 consecutive days but constitute a pattern are considered to represent a change in placement.</p> <p>b. Prior to a suspension that constitutes a change in placement of a student with disabilities, the TEAM convenes</p> <ol style="list-style-type: none"> 1. to develop or review a functional behavioral assessment of the student’s behavior and to develop or modify a behavior intervention plan; 2. to identify appropriate alternative educational setting(s); and 3. to determine the relationship between the disability and the behavior – “a manifestation decision”. (Is IEP appropriate? Is placement appropriate? If there was a behavior plan, was it implemented? Does student understand impact and consequences of his/her behavior? Can student control behavior?). <p>c. If the TEAM determines that the behavior is <u>NOT</u> a manifestation of the disability, then the district may suspend or expel the student consistent with policies applied to any student without disabilities, except that the district must still offer an appropriate education program to the student with disabilities which may be in some other setting.</p> <p>d. Regardless of the manifestation determination, the district may place the student in an interim alternative educational setting (as determined by the TEAM) for up to 45 days</p> <ol style="list-style-type: none"> 1. if the behavior involves weapons or illegal drugs or another

CRITERION NUMBER	
	Legal Standard
	<p>controlled substance while at school or a school function; or</p> <p>2. if the district provides evidence that the student is “substantially likely” to injure him/herself or others and a hearing officer orders the alternative placement; and</p> <p>3. the interim alternative education setting enables the student to continue in the general curriculum, to continue receiving services identified on the IEP, and provides services to address the problem behavior.</p> <p>e. If the TEAM determines that the behavior <u>IS</u> a manifestation of the disability, then the district takes steps (with the consent of the parent) to correct the IEP, the placement, or the behavior intervention plan and does not suspend the student again during the school year.</p> <p>f. The school district provides written notice to the parent of all rights to appeal and to an expedited hearing. If the parent chooses to appeal, during the appeal the student stays put in the placement on the last accepted IEP or the interim alternative placement, unless the parent and the school district agree otherwise.</p> <p>State Regulations Federal Requirements 20 U.S.C. Chapter 33, Section 1415(k) 34 CFR 300.519-300.529</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 48A	<p>Procedural requirements applied to students not yet determined to be eligible for special education</p> <p>a. If, prior to the disciplinary action, a district had knowledge that the student may be a student with a disability, then the district makes all protections available to the student until and unless the student is subsequently determined not to be eligible. The district may be considered to have prior knowledge if:</p> <ol style="list-style-type: none"> 1. the parent had expressed concern in writing; or 2. the parent had requested an evaluation; or 3. school district staff had expressed concern that the student had a disability. <p>b. If the district had no reason to consider the student disabled, and the parent requests an evaluation subsequent to the disciplinary action, the district must have procedures to conduct an expedited evaluation to determine eligibility. If the student is found eligible, then he/she</p>

CRITERION NUMBER	
	Legal Standard
	receives all procedural protections subsequent to the finding of eligibility. c. The school district has developed procedures consistent with IDEA-97 requirements to expedite evaluations.
	State Regulations Federal Requirements 20 U.S.C. Chapter 33, Section 1415(k)
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
SE 49	FAPE: Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education Students with special needs, including those in private schools, institutions and restrictive settings, have equal opportunity to participate in, and where appropriate, receive credit for educational, non-academic, extracurricular and ancillary programs, services and activities with students in the regular education program to the maximum extent appropriate. Programs, services and activities include, but are not limited to:
	a. art and music b. vocational education, industrial arts, and consumer and homemaking education c. work study and employment opportunities d. counseling services e. health services f. transportation g. recess and physical education, including adaptive physical education h. athletics and recreational activities i. school-sponsored groups or clubs j. meals
	State Regulations Federal Requirements 502.13, 502.4(e), 502.4(i), 502.12(d) IDEA-97
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
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	Legal Standard
SE 50	<p>Related services For each student with special needs found to require related services, the School district provides or arranges for the provision of such services which include but are not limited to:</p> <ul style="list-style-type: none"> a. vocational, career and rehabilitation counseling b. school health services c. orientation and mobility services (peripatology) d. occupational therapy e. physical therapy f. speech and language therapy g. social and psychological services, limited to: <ul style="list-style-type: none"> <input type="checkbox"/> group sessions conducted within the public school, provided that such services provided to parents are directly related to the objectives in the IEP <input type="checkbox"/> individual consultation by school counseling staff <input type="checkbox"/> crisis intervention <input type="checkbox"/> individual counseling <input type="checkbox"/> consultation between school counseling staff and a regular education teacher h. audiology i. medical services for diagnostic and evaluative purposes provided by a licensed physician j. parent-child instruction k. transportation l. other services as recommended by the TEAM <p>State Regulations Federal Requirements 127.0, 503.2(a)-(j) 20 U.S.C. Chapter 33, Section 1401(22)</p>
	District Response Required: No
	Rating: Implemented

Department of Education Findings:

The occupational therapist is more readily available this year to meet student needs at their home schools. A school adjustment counselor has been recently hired to meet with groups and individuals as needed.

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION V. STUDENT SUPPORT SERVICES
	Legal Standard
MOA 1	<p>Notification of school district staff and the general public At the beginning of each school year, students, parents, employees, and the general public are:</p> <ul style="list-style-type: none"> X notified that all programs, activities and employment opportunities are offered without regard to race, color, sex, religion, national origin, sexual orientation and disability

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION V. STUDENT SUPPORT SERVICES
	Legal Standard
X	given the name(s), address(es) and telephone number(s) of Title VI, Title IX and Section 504 coordinator(s) Title VI; Title IX; S. 504; MGL, Ch.76, Section 5
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

According to the interviews conducted and the documentation submitted, the required general notice is not distributed to all persons included under this criterion nor does it include all of the required elements.

CRITERION NUMBER	
	Legal Standard
MOA 2	Publication of notices of non-discrimination Major publications for students, parents and employees contain notices of non-discrimination. Title VI; Title IX; S. 504; MGL, Ch.76, Section 5
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

According to the interviews conducted and the documentation submitted, major publications do not consistently contain notices of non-discrimination. The required general notifications are not consistently distributed and do not contain all required elements.

CRITERION NUMBER	
	Legal Standard
MOA 6	Grievance procedures Written grievance procedures for students and for employees covering Title VI (race, national origin), Title IX (sex equity), and Section 504 (disability) have been adopted and published, and a grievance process is in place that provides prompt and equitable resolution. Title II, Title VI, Title IX, S. 504
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

According to interviews and documentation submitted, information as to grievance procedures is not consistent in content or manner of announcement throughout the Union.

CRITERION NUMBER	
	Legal Standard
MOA 8	<p>Availability of information to prospective occupational/vocational students All students in grades 7-9, including those in special education and English as a second language programs, receive counseling and information on the full range of general curricular and any occupational/vocational opportunities available to them. Title VI, Title IX, S. 504</p>
	<p>Rating: Not Implemented District Response Required: Yes</p>

Department of Education Findings:

There was no documentation presented to verify that the Richmond Consolidated School, the only school in the Union that contains 7th and 8th graders, is in compliance with this criterion.

CRITERION NUMBER	
	Legal Standard
MOA 9	<p>Counseling materials and activities free from bias and stereotypes To ensure that materials and activities are free from bias and stereotypes on the basis of race, color, sex, religion, national origin, sexual orientation or disability, all counselors:</p> <ul style="list-style-type: none"> X encourage students to consider programs of study, courses, extracurricular activities, and occupational opportunities on the basis of individual interests, abilities, and skills X examine testing materials for bias and counteract any found bias when administering and interpreting test results X communicate effectively with limited English-proficient and disabled students and facilitate their access to all programs and services offered by the district X support students in non-traditional educational and occupational pursuits for their gender <p>Title II, Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</p>
	<p>Rating: Not Implemented District Response Required: Yes</p>

Department of Education Findings:

Documentation was not submitted to verify compliance with the components of this criterion.

CRITERION NUMBER	
	Legal Standard
MOA 17	<p>Non-discriminatory administration of scholarships, prizes and athletic awards Scholarships, prizes and athletic awards sponsored or administered by the district are free of restrictions based upon race, color, sex, religion, national origin, sexual orientation or disability with the following exceptions:</p> <ul style="list-style-type: none"> X when making athletic awards to members of single sex teams, awards are in proportion to the number of students of each gender participating in interscholastic competition X when accepting outside assistance (i.e. wills, trusts) for awards that would discriminate, the district provides an alternative source of funding to erase the discriminatory effect <p>Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</p>
	<p>Rating: Implemented District Response Required: No</p>

COMPONENT VI: FACULTY, STAFF AND ADMINISTRATION

The criteria in this component examine whether the district has certified staff, provides supervision of aides and tutors, and provides ongoing professional development in the program areas listed below:

- Special Education (Report Issues # SE 51-54)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 18-21)

CRITERION NUMBER	SPECIAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION		
	Legal Standard		
SE 51	<p>Appropriate teacher certifications -- special education services Individuals who provide direct special education services described under 503.2, or who supervise the provision of special education services by paraprofessionals, are appropriately certified or licensed.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations 502.12(c)(i)</td> <td style="width: 50%;">Federal Requirements IDEA-97</td> </tr> </table>	State Regulations 502.12(c)(i)	Federal Requirements IDEA-97
State Regulations 502.12(c)(i)	Federal Requirements IDEA-97		
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Rating: Implemented</td> <td style="width: 50%;">District Response Required: No</td> </tr> </table>	Rating: Implemented	District Response Required: No
Rating: Implemented	District Response Required: No		

CRITERION NUMBER	SPECIAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION		
	Legal Standard		
SE 52	<p>Appropriate certifications or other credentials -- related services Any person, including non-educational personnel, who provides the related services described in Regulation 503.2, who supervises paraprofessionals in the provision of related services, or who provides support services directly to the regular or special classroom teacher is appropriately certified, licensed, board-registered or otherwise approved to provide such services by the relevant professional standards board or agency for the profession. If no such board exists, the Administrator of Special Education ensures the appropriateness of using non-educational personnel in each individual case.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations 502.12(c)(ii), 502.12(c)(iii)(2)</td> <td style="width: 50%;">Federal Requirements IDEA-97</td> </tr> </table>	State Regulations 502.12(c)(ii), 502.12(c)(iii)(2)	Federal Requirements IDEA-97
State Regulations 502.12(c)(ii), 502.12(c)(iii)(2)	Federal Requirements IDEA-97		
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Rating: Implemented	District Response Required: No		

CRITERION NUMBER	SPECIAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
SE 53	<p>Use of paraprofessionals</p> <p>a. Paraprofessionals and assistants (e.g., teacher aides, tutors and student teachers) are appropriately trained to assist in providing special education or related services.</p> <p>b. Persons employed as paraprofessionals and assistants are under the direct supervision of an appropriately certified or licensed</p>

CRITERION NUMBER	
	Legal Standard
	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p style="text-align: center;">professional.</p> <p>State Regulations 502.12(c)(i)</p> </div> <div style="width: 45%;"> <p>Federal Requirements 20 U.S.C. Chapter 33, Section 1412(a)(15)</p> </div> </div>
	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">Rating: Implemented</div> <div style="width: 45%;">District Response Required: No</div> </div>

CRITERION NUMBER	
	Legal Standard
SE 54	<p>Training topics Over a three year period, the required training topics are addressed for professional and paraprofessional staff:</p> <ol style="list-style-type: none"> a. special education requirements; b. local special education policies and procedures; c. confidentiality of student records; d. all other training topics indicated in Local Special Education Program Plan; e. instructional practices for students with diverse learning needs; and f. transportation <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>State Regulations</p> </div> <div style="width: 45%;"> <p>Federal Requirements 20 U.S.C. Chapter 33, Section 1412(a)(15)</p> </div> </div>
	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">Rating: Partially implemented</div> <div style="width: 45%;">District Response Required: Yes</div> </div>

Department of Education Findings:

According to staff interviews, training efforts in the area of special education have only occurred during the past year and do not demonstrate an ongoing three-year cycle of training across all required topics. It was reported that training in specific topics has been presented by the present director of special education.

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
MOA 18	<p>School district employee recruitment activities The district's employee recruitment activities are aimed at reaching all groups, including bilingual/bicultural persons, females/males in nontraditional roles and persons with disabilities. When certain categories of employment show a disproportionate number of females/males, racial and ethnic group members or disabled persons, the district makes efforts to recruit for such positions members of the under represented groups.</p>

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
	Title I, Title VI, Title IX, S. 504
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 19	Employment application and interview procedures Job application forms and interview questions conform to requirements regarding pre-employment inquiries of a candidate’s race, ethnicity, age, marital and parental status, national origin, physical attributes, religious background, health, health history and physical or mental condition. Title I, Title VI, Title IX, S. 504
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

The notice of non-discrimination in the Union’s employment application needs to be revised to include all of the elements required under this criterion..

CRITERION NUMBER	
	Legal Standard
MOA 20	Non-discriminatory personnel policies and procedures District personnel policies and procedures are free of discrimination and bias in the following areas: X employee hiring, upgrading, award of tenure, demotion, return from layoff and retirement are the same for both sexes X employee pay schedules and rates of other compensation for all job categories provide equal pay for equal work X fringe benefits for all job categories such as medical, dental, insurance, leave (sick, personal, professional, parental, dependent care, bereavement) etc. are the same for all employees Title I, Title VI, Title IX, S. 504
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 21	Staff training regarding civil rights responsibilities New hires to the district are provided in-service training regarding civil rights responsibilities, and existing staff and administrators are provided periodic in-service training regarding civil rights responsibilities. Title VI, Title IX, S. 504
	Rating: Not Implemented District Response Required: Yes

Department of Education Findings:

There was no evidence that staff in the three schools in the towns represented by the Union have received training regarding civil rights responsibilities except for a one-day conference on Section 504 attended by the three building principals in January 2000.

COMPONENT VII: SCHOOL FACILITIES

The criteria in this component examine whether the district maintains facilities that are conducive to learning, facilitate integration, and provide equal access and opportunity for students to achieve in the program areas listed below:

- Special Education (Report Issues # SE 55-57)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 7 and 14)

CRITERION NUMBER	SPECIAL EDUCATION VII. SCHOOL FACILITIES	
	Legal Standard	
SE 55	Comparability of facilities Programs are provided in rooms that are at least equal in all physical respects to the average standards for regular education facilities. State Regulations 508.1	Federal Requirements IDEA-97
	Rating: Implemented	District Response Required: Yes

CRITERION NUMBER		
	Legal Standard	
SE 56	Facilities maximize integration The facilities in which programs are provided maximize the integration of students into the life of the school and minimize separation and stigmatization. State Regulations 508.2 (a-c)	Federal Requirements IDEA-97
	Rating: Partially implemented	District Response Required: No

Department of Education Findings:

A visit to the temporary site of the Richmond School indicated non-compliance with this criterion for the current academic year in that the special education classroom is located by itself in the basement of the building.

CRITERION NUMBER		
	Legal Standard	
SE 57	Equal Access Students with limited mobility, visual, hearing, or other physical impairments have equal access to all school programs and facilities necessary to implement their IEPs. State Regulations 508.3	Federal Requirements IDEA-97, Section 504 of the Rehabilitation Act of 1973
	Rating: Partially implemented	District Response Required: No

Department of Education Findings:

Although the Richmond Consolidated School is now being remodeled and expanded and the Town of Lanesborough has committed to a new facility, at the time of the site visit neither the present facility in Lanesborough nor the temporary quarters of Richmond were in compliance with the requirements of this criterion.

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION VII. SCHOOL FACILITIES
	Legal Standard
MOA 7	<p>Accessibility of district programs and services for students with limited physical mobility In at least one facility within the district, the district makes available and entirely accessible to students with disabilities all educational programs and services offered at each level (preschool, elementary and secondary). Title II of the Americans with Disabilities Act; S. 504; MGL, Ch. 71B; Individuals with Disability Act-Revisions of 1997, (IDEA-97)</p>
	Rating: Partially implemented District Response Required: No

Department of Education Findings:

See SE 57 above.

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION VII. SCHOOL FACILITIES
	Legal Standard
MOA 14	<p>Comparability of facilities and programs Where the district provides separate facilities or programs for members of a specific group, facilities and programs are comparable to those offered other students in the district, including: X separate classes and facilities for disabled, limited English-proficient or pregnant students that are comparable to the facilities, programs, equipment and services offered other students in the district; X changing rooms, showers and other facilities for students of one gender that are comparable in size, number and location to those provided students of the other gender. Title II, Title VI, Title IX, S. 504, MGL, Ch. 76, Section 5</p>
	Rating: Partially Implemented District Response Required: No

Department of Education Findings:

See SE 56 above.

COMPONENT VIII: PROGRAM PLAN AND EVALUATION

The criteria in this component examine whether the district has written programs plans that are evaluated according to specific regulatory requirements and whether parents have opportunities for input on needs, program implementation, evaluation, and improvement in the program areas listed below:

- Special Education (Report Issue # SE 58)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 22-23)
 - Safe and Drug Free Schools (Report Issue # SDF 5-8)

CRITERION NUMBER	SPECIAL EDUCATION VIII. PROGRAM PLAN AND EVALUATION	
	Legal Standard	
SE 58	<p>Special education programs and services are evaluated</p> <p>a. Special education programs, services and administrative areas are regularly evaluated.</p> <p>b. The school district's program evaluation plan includes methods for determining the effectiveness of programs in assisting students to achieve the goals set forth in their IEPs in the least restrictive environment, describes how the school district uses information it gathers from annual IEP reviews to measure the effectiveness of special education programs, and identifies programs, services and administrative areas that need improvement or must be developed.</p>	
	<p>State Regulations 506.0, 506.1, 506.3(a)</p>	<p>Federal Requirements IDEA-97</p>
	Rating: Partially Implemented	District Response Required: Yes

Department of Education Findings:

The documentation presented indicated that then Union does assess the effectiveness of its inclusion through a parent questionnaire. However, there was no evidence if how this information is used in determining the effectiveness of the overall program. Additionally, there was no evidence of how the Union gathers information from other sources stated within this criterion for the purpose of identifying those areas needing improvement.

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION VIII. PROGRAM PLAN AND EVALUATION	
	Legal Standard	
MOA 22	<p>Curriculum review process</p> <p>The district has in place a regular review process to ensure that:</p> <p>X existing curriculum materials present fair perspectives of the culture, history, activities and contributions of persons and groups of different races, nationalities, sexes and colors</p> <p>X all new purchases of curriculum materials present non-stereotyped and non-detrimental characterizations of under represented groups and both sexes</p> <p>MGL, Ch.76, Section 5</p>	
	Rating: Not Implemented	District Response Required: Yes

Department of Education Findings:

Across the Union, there was no evidence of a formal process of curriculum review as required under

this criterion.

CRITERION NUMBER	
	Legal Standard
MOA 23	<p>Institutional self-evaluation The district has in place a comprehensive evaluation process to examine and remedy policies and programs that discriminate or limit educational access due to race, color, sex, religion, national origin, sexual orientation, or disability. Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</p>
	<p>Rating: Not Implemented District Response Required: Yes</p>

Department of Education Findings:

There was no evidence of a process for the evaluation of policies and programs for discrimination as required under this criterion.

CRITERION NUMBER	SAFE AND DRUG FREE SCHOOLS VIII. PROGRAM PLAN AND EVALUATION
	Legal Standard
SDF 5	<p>Each recipient bases its programs on a thorough assessment of objective data about the drug and violence problems in the schools and communities served. Each SDFSCA grant recipient conducts a thorough assessment of the nature and extent of youth drug use and violence problems. [Title IV Sections 4111 – 4116, 20 U.S.C. 7111 – 7116]</p>
	<p>Rating: Not Implemented District Response Required: Yes</p>

Department of Education Findings:

A review of documentation indicated that since 1997 the district has not done an objective needs assessment that meets the legal standard above. Tobacco surveys and anecdotal information do not meet the criterion. While much training has been offered by the Department in this critical process and specific recommendations made to Union 69 in the past, this standard has not been met in any particulars.

CRITERION NUMBER	
	Legal Standard

SDF 6	Each recipient, with the assistance of a local or regional advisory council, establishes a set of measurable goals and objectives and designs its programs to meet those goals and objectives. [Title IV Sections 4111 – 4116, 20 U.S.C. 7111 – 7116]
	Rating: Not Implemented District Response Required: Yes

Department of Education Findings:

Measurable objectives must be derived from the needs identified by an objective analysis of appropriate assessment data. The Department of Education Findings under criteria SDF 2A and 5 pertain.

CRITERION NUMBER	
	Legal Standard
SDF 7	Each recipient designs and implements its programs for youth based on research or evaluation that provides evidence that programs used actually prevent or reduce drug use, violence or disruptive behavior among youth. [Title IV Sections 4111 – 4116, 20 U.S.C. 7111 – 7116]
	Rating: Not Implemented District Response Required: Yes

Department of Education Findings:

This standard refers to “research-based” or “science-based” programs that have been evaluated according to strict criteria and have demonstrated statistical evidence of effectiveness. Or the local district may present evidence that its program produces a measurable, statistically significant difference in outcomes. According to the documentation provided, Union 69 has not specified programs or activities to meet the defined measurable objectives, nor specified the means to evaluate the effectiveness of such initiatives.

CRITERION NUMBER	
	Legal Standard
SDF 8	Each recipient evaluates its programs periodically to assess its progress toward achieving its goals and objectives, and uses its evaluation results to refine, improve and strengthen its programs, and to refine its goals and objectives as appropriate.
	Rating: Not Implemented District Response Required: Yes

Department of Education Findings:

A review of documentation and interviews indicated no evaluation plan exists for Safe and Drug Free Schools programs.

COMPONENT IX: RECORD KEEPING

The criteria in this component examine whether the district maintains required records and documentation for the program areas listed below:

- Special Education (Report Issues # SE 59-60A)
- Safe and Drug Free Schools (Report Issue # SDF 9)

CRITERION NUMBER	SPECIAL EDUCATION IX. RECORD KEEPING				
	Legal Standard				
SE 59	<p>Register of students in need of special education An annual ever current register of students in need of special education is maintained that contains all required areas:</p> <ul style="list-style-type: none"> a. name of student b. address/telephone number c. date of birth d. full name of parent e. date referral received f. date(s) of TEAM meetings and reviews g. date of acceptance or rejection of IEP h. beginning date of special education i. current program prototype j. name of school or other place where special education is delivered <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations</td> <td style="width: 50%;">Federal Requirements</td> </tr> <tr> <td>300.1 - 300.10</td> <td>IDEA-97</td> </tr> </table>	State Regulations	Federal Requirements	300.1 - 300.10	IDEA-97
State Regulations	Federal Requirements				
300.1 - 300.10	IDEA-97				
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Rating: Partially Implemented</td> <td style="width: 50%;">District Response Required: Yes</td> </tr> </table>	Rating: Partially Implemented	District Response Required: Yes		
Rating: Partially Implemented	District Response Required: Yes				

Department of Education Findings:

The register which was submitted did contain all of the components a-j. However, the data itself was inconsistent with the data found in other documentation and tracking mechanisms maintained by the district and the Department of Education.

CRITERION NUMBER	SPECIAL EDUCATION IX. RECORD KEEPING				
	Legal Standard				
SE 60	<p>Child Count</p> <ul style="list-style-type: none"> a. A child count is maintained representing students with current, accepted IEPs who are provided, at a minimum, direct special education services to each student. The count is filed as part of annual school report by December 1 of each school year and provides an unduplicated listing of the number of students with IEPs in each program prototype and does not reveal the identity of individual students or their parents. b. The child count includes students with disabilities determined eligible for special education who are attending private schools at private expense and are receiving publicly funded services according to a "services plan" developed by the TEAM. <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations</td> <td style="width: 50%;">Federal Requirements</td> </tr> <tr> <td>301.0</td> <td>20 U.S.C. Chapter 33, Section 412(a)(3)(A)</td> </tr> </table>	State Regulations	Federal Requirements	301.0	20 U.S.C. Chapter 33, Section 412(a)(3)(A)
State Regulations	Federal Requirements				
301.0	20 U.S.C. Chapter 33, Section 412(a)(3)(A)				

CRITERION NUMBER	
	Legal Standard
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

The data included in the registers submitted is inconsistent with data submitted to the Department of Education, the federal child count, and the School System Summary Report. In consideration of this inconsistency, the Department will be making further inquiry with the district regarding documentation of its child count for special education.

CRITERION NUMBER	
	Legal Standard
SE 60A	<p>Federal Special Education Entitlement Grant</p> <p>a. The district’s Special Education entitlement grant is designed by appropriate local administrators who are responsible for the implementation of the local special education programs and services.</p> <p>b. Where necessary, appropriate local administrators amend the programmatic and budgetary sections of the grant according to procedures and timelines required by the Department of Education.</p> <p>c. Appropriate local administrators monitor the entitlement grant in an ongoing manner to ensure its full implementation as it has been approved by the Department of Education.</p> <p>d. The district has secured the approval of the Department of Education</p> <p style="text-align: center;">for all amendments prior to their implementation.</p> <p>State Regulations Federal Requirements School Finance and Accountability Regulations IDEA –97</p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	SAFE AND DRUG FREE SCHOOLS IX. RECORD KEEPING
	Legal Standard
SDF 9	<p>Appropriate accounting and budget procedures are being implemented to insure that program expenditures are related to the purpose and intent of the Safe and Drug Free Schools and Communities Act.</p> <p>[(EDGAR 76.730 TO 734)]</p>

CRITERION NUMBER	SAFE AND DRUG FREE SCHOOLS IX. RECORD KEEPING
	Legal Standard
	Rating: Not Implemented District Response Required: Yes

Department of Education Findings:

No documentation was offered to indicate how the SDFSCA expenditures support the proposal approved by the Department of Education. Expenditure logs must be maintained to indicate how distribution is tied to stated grant objectives.

APPENDIX:
SCHOOL DISTRICT PROFILE INFORMATION

The information which is provided in this Appendix was drawn from data supplied by the school district. The Department's visiting team carefully reviewed this data as part of its planning for the onsite visit and in preparing this Coordinated Program Review Report. The information is periodically updated by the school district and is available in an ever current form on the Department's Internet web site at <www.doe.mass.edu>.

SCHOOL AND DISTRICT PROFILES

Definitions of Terms

School and District Profiles make important information about the Commonwealth's public schools available to all interested citizens. The array of information presented in the Profiles provides one snapshot of the educational picture in communities across the state. This information can be used in conjunction with firsthand observations and discussions by parents, educators, policy-makers, and any other interested parties to inform decision-making and ultimately improve the education of all Massachusetts students. The following is an explanation of information presented in the Profiles. All data are submitted by schools and districts to the Department of Education. Data that are collected at the district level only are not included in the School Profiles, and are indicated below with an asterisk.

GENERAL INFORMATION

Grades/Schools*: indicates the number and grade range of elementary, middle/junior high and high schools in the district, as well as the total number of schools in the district and the grade range of the school system. An elementary range beginning with "N" indicates the district has pre-kindergarten. A high school range ending in "13" or "14" indicates the district has a post-graduate program.

Programs*:

- **Inter-district Choice:** indicates whether students from other districts may enroll in the district through the state school choice program, which is voluntary and on a space-available basis.
- **Intra-district Choice:** indicates whether the district has a school choice program within the school district for students who live in the district.
- **Early Childhood Education:** indicates whether the district provides no-cost early childhood (preschool) education to three and/or four year-old children.
- **Kindergarten Starting Age:** indicates the age as of a particular date at which children are eligible to begin kindergarten.
- **Vocational Education:** indicates whether the district operates a Chapter 74 approved vocational education program.
- **Transitional Bilingual Education (TBE):** indicates whether the district operates a TBE program. Under Massachusetts law, a district must provide a TBE program in a particular language if there are 20 or more limited English proficient students in that particular language group enrolled in the district. Limited English proficient students are students whose first language is not English and who cannot perform ordinary classwork in English.
- **METCO:** indicates whether the district participates in the state METCO program, which promotes voluntary desegregation by enrolling minority students from Boston and Springfield in suburban schools.

Member(s) of Regional District(s)*: for local school districts, indicates the name(s) of any academic and/or vocational regional district(s) of which the local school district is a member. For regional school districts, indicates the names of member local school districts. A regional school district provides educational services to more than one town.

Technology: indicates the number of students for every one computer and the percent of classrooms with Internet access. Data are 1998-99 data; "DNR" appears for schools and districts which did not yet report data.

STUDENT TEST RESULTS

Massachusetts Comprehensive Assessment System (MCAS): The Massachusetts Comprehensive Assessment System is the Commonwealth's new statewide assessment program for public schools. MCAS measures the performance of students, schools and districts on the academic learning standards contained in the Massachusetts *Curriculum Frameworks*. In May 1998 and 1999, students in grades four, eight and ten took the MCAS tests in English Language Arts, Mathematics, and Science and Technology.

When interpreting the MCAS results and making comparisons between schools and districts, it is important to recall that a single year's test results provide limited information about overall performance. This is particularly true of test results from the first administration of a new testing program. Test results are most meaningful when compared with other indicators and when examined over several years to establish long-term trends. Furthermore, at the time the 1998 and 1999 tests were administered, many schools were still in the process of aligning their curriculum, instruction and assessment practices with the state's new learning standards. For these reasons, results from this first MCAS administration should be interpreted as a baseline against which improvement in the future will be measured.

Results on the MCAS tests are reported as the percentage of students attaining each performance level for each subject area and grade tested. Results are shown for all students and are also disaggregated by student group. The performance levels describe student performance in relation to the state standards. There are four performance levels: *Advanced, Proficient, Needs Improvement, and Failing*. Students' performance level classification is based on their total scaled score for each test completed. The scaled score range is 200-280. Students who were absent during the testing period received a minimum score of 200 for each content area test not attempted; this score is counted in computing average scores for schools and districts. Percentages may not add to 100 due to rounding.

To ensure the confidentiality of individual student results, performance data (performance level percentages and scaled score) are not reported for a particular student population/grade/subject if the number of students tested plus the number of students absent is fewer than 10. Results for schools and districts which do not have one or more of the grades tested are shown as "NA" for those grades. For additional information, please refer to the *Report of 1998 Statewide Results: The Massachusetts Comprehensive Assessment System (MCAS)* and *The Massachusetts Comprehensive Assessment System: Guide to Interpreting the 1998 MCAS School and District Reports*. These reports are available on the Internet at the Department of Education's web site at www.doe.mass.edu/mcas.

Iowa Grade 3 Reading Test: indicates the percent of third-graders at each performance level on the reading comprehension section of the test, from Spring 1999. Results are not included for schools or districts for which fewer than six students participated.

SAT: indicates the average scores on the math and verbal sections of the SAT I, administered by the College Board, and the percentage of students taking the test, for the classes of 1995 and 1999. All data are for public school students only. Results are not included for schools or districts for which fewer than 10 students participated. For students who took the SAT I more than once, their latest score is used by the College Board in determining school and district average scores. Beginning with 1996 scores, the College Board recentered the score scale of the SAT I to reestablish the original mean score of 500. The 1995 scores shown in the Profiles have been recentered to be comparable to the 1999 scores. All data were obtained from the College Board.

Advanced Placement: indicates the number of exams taken, the number and percent of exams that scored 3 or higher (possible score range is from 1 to 5), and the number and percentage of students in the class of 1997 who participated (students may take more than one exam). Data are included for all AP exams taken by any students in the class of 1997 who took an AP exam in their senior year. District and statewide data are for public school students, and national data are for public and non-public school students. Results are not included for schools or districts for which fewer than 10 students participated.

ENROLLMENT AND STAFF

Enrollment by Grade: indicates the enrollment for grades kindergarten through 12 for the 1994-95 and 1998-99 school years.

Race/Ethnicity: indicates the percent of enrollment by race/ethnicity for the 1998-99 school year. The reporting categories are those used by the U.S. Bureau of the Census.

Selected Populations: indicates the percent of enrollment represented by students in special education programs*, students who are limited English proficient, and students eligible to receive free or reduced price lunch*. Data are for the 1998-99 school year.

Children Attending Public Schools*: indicates the percent of school-age children in a city or town attending public schools, for the 1994-95 and 1997-98 school years.

Staff (FTE)*: indicates the number of students per teacher for the 1998-99 school year. This figure is calculated by dividing the regular education instructional staff by the total student enrollment. The staff figure is in full-time equivalents (FTE), and the student figure is a headcount. The number of students per teacher reported here does not represent average class size and is usually lower than that found in most typical classes.

FINANCE

Per Pupil Expenditures*: are calculated by dividing a district's operating costs by its average pupil membership. Operating costs include expenditures for administration, instruction, pupil services, transportation, plant maintenance, and fixed charges. These costs do not include capital outlay and long-term interest on school debt. Average pupil membership includes students who receive services in the district's schools, as well as students receiving home or hospital instruction. Data for regular education, special education, bilingual education and vocational education students are provided in addition to the total for all day programs, for the 1993-94 and 1997-98 school years.

Teacher Salary*: indicates the minimum and maximum teacher salaries available, for the 1994-95 and 1998-99 school years.

Foundation Budget Spending Comparison*: The education reform act established a foundation budget for each school district. This budget represents the minimum level of spending needed to provide an adequate education for the district's students. The foundation budget is made up of 19

separate categories. The chart shows the district's actual spending in each category for the 1997-98 school year as a percentage of the district's foundation budget. If the percentage exceeds 100%, the district spent more in the category than suggested by the foundation budget. If the percentage is less than 100%, the district spent less. Significant variations between local spending and the foundation budget, or between local spending and the statewide averages, should be reviewed closely. In some cases, the differences may be due to unique circumstances and needs within the district. In other cases, the differences may suggest potential areas for review and improvement.

OTHER DATA

Annual Dropout Rate: indicates the percentage of students in grades 9-12 who dropped out of school between July 1, 1997, and June 30, 1998, and who did not return to school by October 1, 1998. The rate for 1994-95 is also provided. Dropouts are defined as students who leave school prior to graduation for reasons other than transfer to another school.

Attendance Rate: indicates the average percentage of enrolled students present in school for the 1997-98 school year.

Student Exclusions: indicates the number of student exclusions that occurred during the 1997-98 school year. An exclusion is defined as the removal of a student for disciplinary purposes permanently, indefinitely or for more than ten consecutive school days.

Plans of High School Graduates: indicates the post-graduate intentions of students in the Class of 1998.

* District level data only.

REPORT 8:

SPECIAL EDUCATION , MOA, SAFE AND DRUG FREE SCHOOLS

File Name: School Union #69 Program Review Final Report 2000.doc

Last Revised on: 5/26/00

Prepared by: DM/RT/CS/JDS