



South Middlesex Regional Vocational Technical School District

**COORDINATED PROGRAM REVIEW
REPORT OF FINDINGS**

Dates of Onsite Visit: February 4-8, 2002

Date of Draft Report: May 24, 2002

Due Date for Comments: June 12, 2002

Date of Final Report: July 24, 2002

Action Plan Due: September 13, 2002

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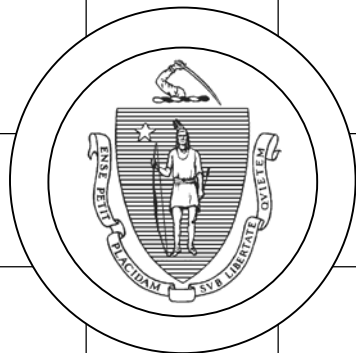
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**MASSACHUSETTS DEPARTMENT OF EDUCATION
COORDINATED PROGRAM REVIEW**

South Middlesex Regional Vocational Technical School District

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MASSACHUSETTS DEPARTMENT OF EDUCATION

COORDINATED PROGRAM REVIEW REPORT

South Middlesex Regional Vocational Technical School District

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. All reviews include selected requirements in special education under the federal Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 et seq. (IDEA-97) and M.G.L. Chapter 71B (Chapter 766 of the Acts of 1972) and certain federal civil rights requirements under Titles I and II of the Americans with Disabilities Act of 1990, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973, together with related state requirements under M.G.L. Chapter 76, Section 5 (Chapter 622 of the Acts of 1971). Additionally, all reviews include certain standards included under the newly adopted Board of Education Physical Restraint Regulations (603 CMR 46.00). Other monitoring activities in the areas of the state's Transitional Bilingual Education law (M.G.L. Chapter 71A), federal requirements under Title I, the Safe and Drug-Free Schools and Communities Act, the Perkins Vocational and Technical Education Act, and Nutrition Programs and Services will be conducted in some districts during these Coordinated Program Reviews. The school districts and charter schools selected for review in 2001-2002 were notified by the Commissioner of Education in April 2001 of the scheduled visits and were encouraged to assess themselves before 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 two to eight members conducts a Coordinated Program Review over two to seven days in a school district or charter school. The team may include Department consultants as well as Department staff members.
- Scope: Approximately sixty school districts and charter schools are scheduled to receive visits in school year 2001-2002. All school districts and charter schools in the Commonwealth are monitored through the Department's Coordinated Program Review system on a six-year cycle with an additional mid-cycle special education follow-up visit.
- Content: The Program Review criteria include certain of the statutory and regulatory requirements for each program area. In the case of special education, the criteria for the FY 2002 reviews contain, at a minimum, those elements required by the federal Office for Special Education Programs (OSEP) and revised requirements under IDEA-97 as described in the Department's Special Education Advisories. Additionally, the 2001-2002 reviews incorporate updated state special education requirements as adopted by the Board of Education, effective December 20, 2000. 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, being intended to promote high standards and achievement for all students.
- Report: The Department's report is based on a review of documentation 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.
- Interviews of parent advisory council (PAC) representatives.
- Other interviews as requested by members of the general public.
- Review of student records in the special education, Transitional Bilingual Education, and Perkins vocational programs. Parents of students with disabilities whose files were selected for the record review are sent a survey that solicits information about their experiences with the district's implementation of special education programs, related services and procedural requirements.
- Observation of classrooms and other facilities. A sample of instructional classrooms and other school facilities used in the delivery of programs and services are visited to determine general levels of compliance with program and accessibility requirements.
- Interviews, review of student records, and observations in the case of collaborative programs and services. Where the district is a member of a collaborative approved by the Department of Education and serves as a site for any programs or services operated by the collaborative, interviews with collaborative staff, review of records of collaborative students, and observations of collaborative facilities 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 note those criteria the implementation of which the team found to be commendable. Where criteria were found not to be fully implemented, the local district or charter school must propose corrective actions to bring those areas into compliance with the controlling statutes or regulations. Districts are encouraged to incorporate the corrective action into their district and school improvement plans, including their 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 as a helpful planning document for the continuing development of programs and services in the school district or charter school.

REPORT INTRODUCTION

A seven-member Massachusetts Department of Education team visited South Middlesex Regional Vocational Technical School District (Keefe Technical School) during the week of February 4, 2002 to evaluate the implementation of selected criteria in the program areas of Special Education, Civil Rights Methods of Administration (MOA), Perkins Vocational and Technical Education, Title I, Transitional Bilingual Education and Nutrition. The team appreciated the opportunity to interview staff and parents, to observe classroom facilities and to review the programs underway in the district. The onsite team would like to commend the following areas that were brought to its attention and that it believes have a significant and positive impact on the delivery of educational services for students enrolled in the Keefe Technical School. These areas are as follows:

A dedicated and supportive staff committed to providing quality education to students.

Participation in “High Schools That Work”, an initiative designed to combine challenging academic courses and modern vocational technical studies to raise the achievement level of career-bound high school students.

An extensive array of extra curricular activities is provided.

All students are encouraged and supported in participating in after school hour events.

Equal opportunities for all students to participate in educational, nonacademic, extracurricular programs, as well as participation in regular education.

State of the art classrooms and facilities and equal access to them for special education students.

Excellent record keeping practices on bilingual students.

Some of the commendations noted above are repeated within the body of the Department’s report under the appropriate compliance criteria.

The Department is submitting the following Coordinated Program Review Report containing findings made pursuant to this onsite visit. In preparing this report, the team reviewed extensive written documentation regarding the operation of the district’s programs, together with information gathered by means of following Department program review methods:

- Interviews of eight administrative staff.
- Interviews of 35 teaching and support services staff across all levels.
- Interviews of 10 students, 4 parent advisory council (PAC) representatives, three School Committee members and three Advisory Council members.
- Student record reviews: A sample of 50 student records were selected by the Department. Student records were first examined by local staff, whose findings were then verified by the onsite team using standard Department of Education student record review procedures to make determinations regarding the implementation of procedural and programmatic requirements.
- Parent surveys: 18 parents of students with disabilities were sent surveys that solicited information regarding their experiences with the district’s implementation of special education programs, related services and procedural requirements. Six of these parent surveys were returned to the Department of Education for review by the onsite team.

- Observation of classrooms and other facilities. A sample of fifteen instructional classrooms and other school facilities used in the delivery of programs and services was visited to determine general levels of compliance with program requirements.

The report includes findings in the program areas reviewed organized under nine components . These components are listed in the executive summary on the following pages. The findings in each program area explain the “ratings, ”determinations by the team about the implementation status of the criteria reviewed. The ratings indicate those criteria that were found by the team to be substantially “Implemented” or implemented in a “Commendable” manner. (Refer to the “Definition of Terms” section of the report.) Where criteria were 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 controlling statute or regulation. In some instances the team may have rated a requirement as “Implemented” but made a specific comment on the district’s implementation methods that also may require response from the district or charter school.

Districts are expected to incorporate the corrective action into their district and school improvement plans, including their professional development plan.

COORDINATED PROGRAM REVIEW REPORT

EXECUTIVE SUMMARY

South Middlesex Regional Vocational Technical School District

The following summary synthesizes the findings for criteria included in the Coordinated Program Review as they respond to essential questions which the Department has formulated for each of the components of the report. Note that a more detailed discussion of the onsite team's findings, 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 district implemented an assessment system that uses appropriate instruments, is conducted according to the specified timelines, and covers the appropriate content areas to determine instructional needs of students?

Academic and career and technical assessments are appropriately selected and conducted for incoming students and are used to identify the individual needs of students. However, more focus could be directed toward late enrollees and students at higher grades so they benefit more from planning for their vocational direction. MCAS and other local assessment results are used and analyzed in determining program needs. It is recommended that the district make more use of student portfolios as a competency measure for students.

The district must implement procedures for determining Specific Learning Disabilities and ensure that special education progress reports contain meaningful feedback of student's progress on IEP goals and the expectation of achievement.

The district is responsive to parent requests for assessments, Team meetings are held within allowed timeframes and the Team consists of all required personnel.

Component II: Student Identification and Program Placement

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

The Keefe Regional Vocational Technical School has an effective system by which special needs students are identified and placed into programs throughout the school. IEP's are routinely developed, specialized instruction and programming is included and determination of placement is well thought out. The district is commended for surpassing school day and school year requirements. The district offers extended day programs, after school programs and programs on Saturdays for eligible special education students. No eligible student is denied these services based on transportation issues. Transportation is also provided for students to participate in extra curricular activities and field trips, to broaden students' learning experiences.

The district works thoughtfully to provide the least restrictive environment for students, however there is a need to further expand the model for inclusion Math and English classes and Shop programs, especially for LEP(Limited English Proficient) students.

The district provides an array of summer programs to support academic achievement.

The district has a program that addresses the needs for its Spanish speaking students through its Spanish TBE program, however, efforts must be made to also provide a TBE program for Portuguese speaking students.

Component III: Parental Involvement

Has the district ensured that parents are notified in the appropriate language and are involved in decisions regarding their children's programs and services? Where appropriate, does the district involve community representatives in shaping programs?

The district involves parents in all facets of the school community. They inform parents of their rights, have a high percentage of parents present at IEP meetings and provide communication in English and the primary language of the home. There is extensive outreach to TBE and low incidence language families. The district should also put forth this effort to Title I families to involve them more in the school community.

There is a small, yet strong and motivated, group of parents who are beginning a Special Education Parent Advisory Council (PAC). The district must support this effort, especially in training parents on special education rights and including the PAC in the evaluation of the special education program.

The school must ensure written parental consent is received before initiating special education services, and develop resources to ensure parents receive the proposed IEP immediately following the Team meeting.

Component IV: Curriculum and Instruction

Does the district hold all students to high expectations and standards? Are programs designed to maximize student performance and students' participation in the general curriculum? Is curriculum throughout the districts' programs aligned with the Massachusetts Curriculum Frameworks? Has the district provided for coordination across program areas?

The district has aligned vocational curricula with academic standards and should continue to do so for LEP and ACCESS students. It has provided vocational programs with the necessary supplies to ensure quality delivery of services. The District has an impressive range of extracurricular and non-academic activities and programs that are open to all students. There is a no-cut policy for sports teams. Particularly of note are the joint activities planned between the Student Council and the JET program.

Although native language aides are used for academic support in some of the shops and related classes, there is little or no native language support for lower level (LEP and NEP) students for their career and technical skill areas. As well, special education students do not have consistent placement opportunities for services within the regular education classes, especially in English and math. Improvements can be made to better link the secondary and post-secondary programs.

Classrooms and shops have state-of-the-art computers and software. The district meets all Title I criteria under this component.

Component V: Student Support Services

Has the district ensured that all students have equal access to programs and services? Does the district provide support to students who need it?

There are effective related service components within the school, particularly for students who need counseling and guidance. The district employs Social Workers that can provide consultation and referral services to students and their families.

The district has begun to train staff in passive physical restraint procedures. However, Functional Behavioral Assessments and Behavioral Intervention Plans are not used in all programs for all students who need them. The ACCESS Program lacks defined procedural requirements including goals, objectives and criteria for entrance to and exit from the program.

The district has implemented all applicable Title I criteria under this component.

Component VI: Faculty, Staff and Administration

Does the district maintain certified staff in the specific program areas, provide supervision of aides and tutors, and provide ongoing professional development? Are program leadership and oversight effective? Are the district's personnel procedures non-discriminatory and does it seek to recruit employees from all groups?

The district has a supportive, hardworking and dedicated staff and Administration. Professional development in many diverse areas is offered throughout the school and through outside agencies. However, the district needs to conduct required training, annually, in the areas of special education and staff civil rights responsibilities.

Some staff in vocational programs are not certified in the area that they teach. In particular, staff in the ACCESS program do not have required academic and technical certification.

The district must develop a DCAP, District Curriculum Accommodation Plan, to address the supports provided under regular education for the diverse learning needs of all students.

Component VII: School Facilities

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

With the exception of the ACCESS Program, located in an outside shed, all facilities within the district provide an equal access and opportunity for students to learn and achieve. The school is accessible on all floors for students with physical disabilities. Facilities and classrooms for special education programs are given the same priority as the general education programs.

The TBE program would benefit from additional translated text, software and other devices to assist students in the program.

Component VIII: Program Plan and Evaluation

Does the District have written program plans where required that are evaluated according to specific regulatory requirements? Does it use the results of its evaluations to improve programs? Do parents have opportunities for input on needs, program implementation, evaluation, and improvement?

The district has been able to make some strides to evaluate programs and services, but there is no comprehensive method in which to do so and the Parent Advisory Council has yet to be included in this process.

The Title I improvement plan needs to be revised.

Component IX: Record keeping

Does the District maintain required records and documentation for each specific program area? Are federal entitlement grants appropriately designed, amended, and monitored?

The district has appropriate procedures to maintain records and documentation for Special Education and Title I programs. The review team did note deficiencies with the assessment documentation for LEP students entering the program, however, record keeping for the Bilingual Program was viewed to be commendable. TBE records were complete and very well organized.

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 of law or regulation.
Implemented	The requirement is substantially met.
Implementation in Progress	In reference to compliance criterion MOA 17A, new Board of Education requirements became effective on April 2, 2001 regarding the use of physical restraint in publicly funded education programs. The district is currently engaged in staff training and is beginning implementation practices for these new requirements which the Department's onsite team anticipates will result in substantial compliance by the end of the 2001-2002 school year.
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 14)
 - Title I (Report Issues # TI 1-4)
- Perkins Vocational and Technical Education (Report Issues # P 1-4)
 - Transitional Bilingual Education (Report Issues # 1-2A)

CRITERION NUMBER	SPECIAL EDUCATION I. ASSESSMENT OF STUDENT PROGRESS
	Legal Standard
<p>SE 1</p>	<p>Assessments are appropriately selected and interpreted for students referred for evaluation</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 <p>State Regulations 28.04</p> <p style="text-align: right;">Federal Requirements 300.532, 300.535</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 2	<p>Required and optional assessments</p> <ol style="list-style-type: none"> 1. <u>Required assessments</u>: The following assessments are completed by appropriately credentialed and trained specialists for each referred student: <ol style="list-style-type: none"> a. Assessment(s) in all areas related to the suspected disability (ies) including consideration of any needed assistive technology devices and services and/or instruction in braille. b. Educational assessment by a representative of the school district, including a history of the student’s educational progress in the general curriculum. c. Assessment by a teacher(s) with current knowledge regarding the student’s specific abilities in relation to learning standards of the Massachusetts Curriculum Frameworks and the district curriculum, as well as an assessment of the student’s attention skills, participation behaviors, communication skills, memory, and social relations with groups, peers, and adults. d. For a child being assessed to determine eligibility for services at age three (3), an observation of the child’s interactions in the child’s natural environment or early intervention program is strongly encouraged together with the use of current assessments from early intervention Teams to avoid duplicate testing. 2. <u>Optional assessments</u>: The Administrator of Special Education may recommend or the parent may request one or more of the following: <ol style="list-style-type: none"> a. A comprehensive health assessment by a physician that identifies medical problems or constraints that may affect the student's education. The school nurse may add additional relevant health information from the student’s school health records. b. A psychological assessment by a certified school psychologist, licensed psychologist, or licensed educational psychologist, including an individual psychological examination. c. A home assessment that may be conducted by a nurse, psychologist, social worker, guidance or adjustment counselor, or teacher and includes information on pertinent family history and home situation and may include a home visit, with the agreement of the parent 3. At the re-evaluation of a student, if <u>the Team decides</u> that no additional assessments are needed to determine whether the student continues to be eligible for special education, the school district recommends to the student’s parents the following: <ol style="list-style-type: none"> a. that no further assessments are needed and the reasons, and b. the right of such parents to request an assessment.

CRITERION NUMBER				
	Legal Standard			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">State Regulations 28.04 (1) and (2)</td> <td style="width: 50%; border: none;">Federal Requirements 300.532; 300.346.(a)(2)(v)</td> </tr> </table>	State Regulations 28.04 (1) and (2)	Federal Requirements 300.532; 300.346.(a)(2)(v)	
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Department of Education Findings:

A review of student records and parent interviews indicated that at the time of a student's re-evaluation, the Team does not consistently inform parents if no further assessments are needed and the reasons why.

CRITERION NUMBER	
	Legal Standard
SE 3	<p>Special requirements for determination of specific learning disabilities When the district proposes to evaluate a child suspected of having a specific learning disability, the following requirements are implemented:</p> <p><u>Team membership:</u> The district ensures the Team includes at a minimum the parent, the child's regular classroom teacher appropriate to the age of the child and at least one person qualified to conduct individual diagnostic examinations of children.</p> <p><u>Criteria for determining the existence of a specific learning disability:</u></p> <ol style="list-style-type: none"> 1. the achievement is determined not to be commensurate with the age and ability of the child; 2. a severe discrepancy exists in one or more areas between achievement and intellectual ability in oral expression, listening comprehension, written expression, basic reading skill and reading comprehension, mathematics calculation and reasoning; 3. the severe discrepancy between ability and achievement is not resulting from visual, hearing or motor impairment, mental retardation, emotional disturbance or environmental, cultural or economic disadvantage. <p><u>Required observation of the child:</u></p> <ol style="list-style-type: none"> 1. at least one Team member <u>other than</u> the child's regular teacher observes the child's academic performance in the regular classroom setting; 2. if the child is less than school age, the observation is conducted in an environment appropriate for a child of that age. <p><u>Written documentation of the Team's determination of eligibility due to the presence of a specific learning disability includes the following:</u></p> <ol style="list-style-type: none"> 1. statement whether the child has a specific learning disability; 2. the basis for making the determination; 3. the relevant behavior noted during the observation of the child; 4. the relationship of that behavior to the child's academic functioning; 5. the educationally relevant medical findings, if any; 6. statement whether there is a severe discrepancy between achievement and ability that is not correctable without special education and/or related services; and

CRITERION NUMBER	
	Legal Standard
	<p>7. the determination of the Team concerning the effects of environmental, cultural, or economic disadvantage.</p> <p><u>Required written certification of Team members:</u> Each Team member certifies in writing whether the report reflects his or her conclusion. If not, the Team member submits a separate statement presenting his or her conclusions.</p> <p style="display: flex; justify-content: space-between;">State Regulations Federal Requirements</p> <p style="text-align: center;"><i>300.540-543</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 4	<p>Reports of assessment results</p> <ol style="list-style-type: none"> 1. Each person conducting an assessment shall summarize in writing the procedures employed, the results, and the diagnostic impression, and shall define in detail and in educationally relevant and common terms, the student's needs, offering explicit means of meeting them. Assessors may recommend appropriate types of placements, but shall not recommend specific classrooms or schools. 2. Summaries of assessments are completed prior to discussion by the Team and, upon request, are made available to the parent at least two days in advance of the Team discussion. <p style="display: flex; justify-content: space-between;">State Regulations Federal Requirements</p> <p style="text-align: center;"><i>28.04(2)(c)</i> <i>300.532</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 5	<p>Participation in general State and district-wide assessment programs</p> <ol style="list-style-type: none"> 1. All students with disabilities whose placements are funded by the district are included in the Massachusetts Comprehensive Assessment System (MCAS) and other district-wide assessment programs.

CRITERION NUMBER					
	Legal Standard				
	2. The district's IEP Teams designate how each student will participate and, if necessary, provide an alternate assessment.				
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations</td> <td style="width: 50%;">Federal Requirements</td> </tr> <tr> <td></td> <td style="text-align: center;"><i>300.138; 300.139</i></td> </tr> </table>	State Regulations	Federal Requirements		<i>300.138; 300.139</i>
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CRITERION NUMBER	
	Legal Standard
SE 6	<p>Determination of transition services</p> <ol style="list-style-type: none"> 1. For a student who is 14 years of age, the Team considers the student's course of study in relation to the student's future goals and documents this in the IEP. 2. For a student who is 16 years of age, or younger if appropriate, the Team includes in the IEP services that promote 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. 3. The transition services are 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. 4. For any student approaching graduation or the age of twenty-two, the Team determines whether the student is likely to require continuing services from adult human service agencies. In such circumstances, the Administrator of Special Education makes a referral to the Bureau of Transitional Planning in the Executive Office of Health and Human Services in accordance with the requirements of M.G.L. c.71, §12A-§12C (known as Chapter 688). 5. 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. 6. The district ensures that students age 14, or younger if appropriate, are invited to and attend Team meetings at which transition services are discussed or proposed

CRITERION NUMBER				
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	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> State Regulations <i>M.G.L. Ch.71B, Sections 12A-C</i> <i>603 CMR 28.05(4)(c)</i> </td> <td style="width: 50%; vertical-align: top;"> Federal Requirements <i>300.344(b), 300.347</i> </td> </tr> </table>	State Regulations <i>M.G.L. Ch.71B, Sections 12A-C</i> <i>603 CMR 28.05(4)(c)</i>	Federal Requirements <i>300.344(b), 300.347</i>	
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CRITERION NUMBER	
	Legal Standard
SE 7	<p>Transfer of parental rights at age of majority and student participation and consent at the age of majority</p> <ol style="list-style-type: none"> 1. One year prior to the student reaching age eighteen, the district informs the student of his or her right at age 18 to make all decisions in relation to special education programs and services. 2. Upon reaching the age of eighteen, the school district implements procedures to obtain consent from the student to continue the student’s special education program. 3. The district continues to send the parent written notices and information but will no longer have decision-making authority, except as provided below. <ol style="list-style-type: none"> (a) If the parent has sought and received guardianship from a court of competent jurisdiction, then the parent retains full decision-making authority. The parent does not have authority to override any decision or lack of decision made by the student who has reached the age of majority unless the parent has sought or received guardianship or other legal authority from a court of competent jurisdiction (b) The student, upon reaching the age of majority and in the absence of any court actions to the contrary, may choose to share decision-making with his or her parent (or other willing adult), including allowing the parent to co-sign the IEP. Such choice is made in the presence of the Team and is documented in written form. The student’s choice prevails at any time that a disagreement occurs between the adult student and the parent or other adult with whom the student has shared decision-making. (c) The student, upon reaching the age of majority and in the absence of any court actions to the contrary, may choose to delegate continued decision-making to his or her parent, or other willing adult. Such choice is made in the presence of at least one representative of the

CRITERION NUMBER				
	Legal Standard			
	school district and one other witness and is documented in written form and maintained in the student record.			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> State Regulations <i>M.G.L. Ch. 231, Sec 3A</i> <i>603 CMR 28.08(5),</i> </td> <td style="width: 50%; vertical-align: top;"> Federal Requirements <i>300.347(c), 300.517</i> </td> </tr> </table>	State Regulations <i>M.G.L. Ch. 231, Sec 3A</i> <i>603 CMR 28.08(5),</i>	Federal Requirements <i>300.347(c), 300.517</i>	
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Rating: Implemented	District Response Required:	No		

CRITERION NUMBER	
	Legal Standard
SE 8	<p><u>Evaluation Team composition</u> The following persons are members of the evaluation Team:</p> <ol style="list-style-type: none"> 1. The child’s parents 2. 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. 3. A representative of the school district who has the authority to commit the resources of the district (and who may act as the Chairperson) 4. 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 must be included as a Team member. 5. The student, age fourteen and older, if he/she chooses 6. Other individuals at the request of the student's parents 7. At least one teacher or specialist trained in the area of the student's suspected special needs 8. Individuals who are qualified to interpret the instructional implications of evaluation results 9. Other individuals who may be necessary to write an IEP for the child, as determined by the Administrator of Special Education 10. When one purpose of the Team meeting is to discuss transition services, the student age sixteen or older (or younger, if appropriate) 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. 11. 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.

CRITERION NUMBER			
	Legal Standard		
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State Regulations 28.02(22)	Federal Requirements 300.344; 300.552		
	Rating: Implemented District Response Required: No		

CRITERION NUMBER	
	Legal Standard
SE 9	<p>Eligibility determination: Timelines for evaluation, provision of IEP and/or identification of other needed instructional programs</p> <ol style="list-style-type: none"> 1. Within forty-five school working days after receipt of the parent's written consent to an initial evaluation, unscheduled evaluation, or re-evaluation, the school district: <ol style="list-style-type: none"> a. provides an evaluation b. convenes a Team meeting c. determines whether the student has one or more disabilities d. determines if the student is making effective progress in school e. determines if any lack of progress is a result of the student's disability f. determines if the student requires special education and/or related services and/or accommodations in order to make effective progress or that the student requires related services in order to access the general curriculum g. develops an IEP where the student is found to need special education h. provides the parent with the proposed IEP, or a written explanation of the finding of no eligibility i. determines that a student is ineligible to receive special education and/or the student's lack of progress is due to a lack of instruction in reading or math or limited English proficiency or social maladjustment, the student is referred to a more appropriate instructional program or support service j. determines at the time of re-evaluation if the student would continue to make progress in school without the provision of special education services. 2. If a Team determines that a student is not eligible for special education but may be eligible for accommodation(s) for disability(ies) under Section 504, the student is referred for consideration by the district for eligibility under that regular education program.

CRITERION NUMBER	
	Legal Standard
	<p>3. When the development of a student’s IEP does not indicate a need for direct services, the Team makes a finding of no eligibility and appropriate services are provided through the district’s general education program.</p> <p>State Regulations 28.05(1) and (2)</p> <p style="text-align: right;">Federal Requirements 300.534</p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

Interviews and a review of student records indicated that the district does not consistently provide a proposed IEP within 45 days of receiving parental consent for evaluation.

CRITERION NUMBER	
	Legal Standard
SE 10	<p>End of school year evaluations If consent is received within thirty (30) to forty-five (45) school working days before the end of the school year, the school district ensures that a Team meeting is scheduled so as to allow for the provision of a proposed IEP or written notice of the finding that the student is not eligible no later than fourteen (14) days after the end of the school year.</p> <p>State Regulations 28.05(1)</p> <p style="text-align: right;">Federal Requirements 300.342</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 11	<p>School district response to parental request for independent evaluation: If a parent disagrees with an initial evaluation or re-evaluation completed by the school district, and the parent requests an independent educational evaluation, the district implements the following requirements:</p>

CRITERION NUMBER			
	Legal Standard		
	<p>1. All independent educational evaluations funded by the district are conducted by qualified persons who are registered, certified, licensed or otherwise approved and who abide by the rates set by the state agency responsible for setting such rates. Unique circumstances of the child are justified when an individual assessment rate is higher than that normally allowed.</p> <p>2. The school district has procedures to offer parents the option of participating in an income eligibility program for free or reduced cost independent educational evaluations that are equivalent to the types of assessments done by the school district.</p> <p>3. The district extends the right to a publicly funded independent educational evaluation (only if cost shared or funded for state wards or for students receiving free or reduced cost lunch) for sixteen (16) months from the date of the evaluation with which the parent disagrees.</p> <p>4. If the parent is requesting an evaluation in an area not assessed by the school district, or if the student does not meet or the parent does not choose to share the financial documentation regarding the income eligibility standards for free or reduced cost independent educational evaluation, then the school district responds in accordance with the requirements of federal law by paying for the independent educational evaluation or, within five school days, proceeding to Special Education Appeals to show that its evaluation was comprehensive and appropriate. Where the Department's Special Education Appeals finds that the school district's evaluation was comprehensive and appropriate, the school district does not pay for the independent educational evaluation requested by the parent.</p> <p>5. Whenever possible, the independent educational evaluation is completed and a written report sent no later than thirty (30) days after the date the parent requests the independent educational evaluation. If publicly funded, the report is sent to the parents and to the school district. The independent evaluator's report summarizes, in writing, procedures, assessments, results, and diagnostic impressions as well as educationally relevant recommendations for meeting identified needs of the student. The independent evaluator recommends appropriate types of placements but does not recommend specific classrooms or schools.</p> <p>6. Within ten (10) school days from the time the school district receives the report of the independent educational evaluation, the Team reconvenes and considers the independent educational evaluation (which may be publicly or privately funded) and whether a new or amended IEP is appropriate.</p> <p>State Regulations 28.04(5)</p> <p>Federal Requirements 300.503(a)(3)(i)</p>		
	Rating: Implemented	District Response Required:	No

CRITERION NUMBER	
	Legal Standard
SE 12	<p>Frequency of re-evaluation</p> <ol style="list-style-type: none"> 1. Every three years, or sooner if necessary, the school district, with parental consent, conducts a full three-year re-evaluation consistent with the requirements of federal law. 2. The district implements re-evaluation procedures in all cases where it is suspected that a student is no longer eligible for special education. <p>State Regulations 28.04(3)</p> <p style="text-align: right;">Federal Requirements 300.536</p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
SE 13	<p>Progress Reports and content</p> <ol style="list-style-type: none"> 1. 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. 2. Progress report information sent to parents includes written 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>State Regulations 28.07(3)</p> <p style="text-align: right;">Federal Requirements 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)(viii) 300.347</p>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

A review of student records indicated that progress reports are sent home as frequently as regular education report cards. However, narratives written on progress reports do not give parents meaningful feedback on the student's progress toward IEP goals and objectives or if progress is sufficient for the student to reach the annual goal.

CRITERION NUMBER	
	Legal Standard
SE 14	<p>Annual review Team meeting 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 re-evaluation, as appropriate.</p> <p>State Regulations 28.04(3)</p> <p>Federal Requirements 300.343(c)</p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	TITLE 1 I. ASSESSMENT OF STUDENT PROGRESS
	Legal Standard
TI 1	<p>MCAS testing has been used to measure the progress of schools and the school district, and the proficiency of students in the academic subjects, adopted by Massachusetts, which reflects challenging content and student performance standards.</p> <p><i>1111(b)(3)(D)</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 2	<p>In a Schoolwide Program all students are assessed in the selected grades during grade spans 3-5, 6-9, 10-12. <i>1114 (c)(1)(B)(I) ESEA, IASA</i></p>
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 3	In Targeted Assistance Schools (schools with less than 50% poverty) either: 1. all Title I identified students who are being served, or 2. all students are assessed in at least one grade of each of the spans (3-5, 6-9, and 10-12.) <i>1115 (c)(1)(A) ESEA, IASA</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 4	MCAS and other local assessment results are analyzed in at least mathematics and reading/language arts and are used a) to determine program needs of students most at risk, b) to inform Title I program design and services, and c) to evaluate the impact on student achievement. <i>1111 (b)(3) ESEA, IASA</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	PERKINS VOCATIONAL I. ASSESSMENT OF STUDENT PROGRESS
	Legal Standard
P 1	(a) Appropriate individual academic assessments are provided to all in-coming students. (Section 135) Appropriate academic assessments administered include, but are not limited to: <ul style="list-style-type: none"> • ABLE • APTICOM

CRITERION NUMBER	PERKINS VOCATIONAL I. ASSESSMENT OF STUDENT PROGRESS
	Legal Standard
	<ul style="list-style-type: none"> • CAT • METROPOLITAN • IOWA • MCAS • STANFORD 9 • WRAT <p>(b) Academic assessments provided to incoming students are used in planning students' academic program. (Sec. 135)</p>
	Rating: Implemented District Response Required: No

Department of Education Findings:

Interviews and documentation indicated that appropriate academic assessments are used to identify students' individual needs. In addition to previous MCAS results, incoming students are administered the Stanford 9 Assessment to assist with placement.

Interviews and documentation indicated that assessment results are used in planning students' academic program of study.

CRITERION NUMBER	
	Legal Standard
P 2	<p>(a) Appropriate individual career and technical assessments are provided to all <u>in-</u> <u>coming</u> students. (Section 135)</p> <p>Appropriate career and technical assessments administered include but are not limited to the following:</p> <ul style="list-style-type: none"> • ACT Career Planning • ACDM • CAB • CIT • SAGE • Myers Briggs Type Indicator • ASVAB • CAP/COP • Bennett Mechanical Comprehension

CRITERION NUMBER	
	Legal Standard
	<ul style="list-style-type: none"> • DISCOVER • Self-Directed Search (SDS) • Career Inventories for the Learning Disabled <p>(b) Career and Technical Education assessments provided to in-coming students are used in planning students' vocational and academic program. (Sec. 135)</p>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Interviews and documentation indicated that a vocational profile inventory is provided to ninth grade students at the end of their exploratory program; however, the SAGE career and technical assessment tool which has been purchased is not being utilized to assist incoming students. The record review indicated that not all students, particularly late enrollees, receive the full benefits of a career and technical assessment.

Interviews and documentation indicated that since the SAGE is not administered to incoming students, only the vocational inventory profile is used to assist students with planning their vocational course of study.

CRITERION NUMBER	
	Legal Standard
P 3	Methods of measuring academic competency gain and competency attainment are appropriate. (Sec. 122)
	Rating: Implemented District Response Required: No

Department of Education Findings:

Assessment results need to be uniformly analyzed and utilized to drive the curriculum, instruction and services provided to all students.

CRITERION NUMBER	
	Legal Standard
P 4	Methods of measuring career and technical competency gain and competency attainment are appropriate. (Section 122)
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Staff and student interviews and documentation indicated that the measurement of students' vocational competency gain and competency attainment are inconsistently documented among individual vocational programs and not uniformly provided to students and their parents/guardians. Currently, there is no documented competency skill gain and attainment process in place for students on a co-op education placement that insures that vocational skill attainment is appropriate and monitored regularly by a vocational instructor who is a technical expert in the students' area of study.

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION I. ASSESSMENT OF STUDENT PROGRESS
	Legal Standard
TBE 1	Pupil's progress reports and report cards are: a) sent to parents or guardians of students enrolled in Transitional Bilingual Education program in the same manner and frequency as progress reports and reports cards are sent to parents or guardians of other students enrolled in the school district; and b) written in English and the native language of the parents or guardians of the student. <i>603 CMR 14.03(2)</i>
	Rating: Implemented District Response Required: No

Department of Education Findings:

Interviews and a review of student records indicated that notices and academic warnings to home are translated, as well as report cards. Parents can request a meeting with the Spanish speaking guidance counselor regarding any aspect of their child's program. There is also a Spanish speaking attendance secretary. Qualified personnel are utilized in the translation of all documents and in representing the school district at meetings and school events.

CRITERION NUMBER	
	Legal Standard
TBE 2	<p>Once a student has been enrolled in the TBE program, he/she is tested annually in the following English skills:</p> <ul style="list-style-type: none"> a) oral comprehension b) speaking c) reading d) writing <p>These assessments will be placed in the student's school record. <i>M.G.L. c.71A, 2</i></p>
	<p>Rating: Implemented District Response Required: No</p>

Department of Education Findings:

Interviews and a review of student records indicated that students are tested each May in oral comprehension, speaking, reading, writing, and listening skills with the LAS (Language Assessment Scales). For initial placement the following Assessment Instruments are also used: SLEP Reading, CELT, Writing Prompt. In Spanish the CTBS (California Test of Basic Skills) is also used.

CRITERION NUMBER	
	Legal Standard
TBE 2A	<p>As required by the Department of Education, the district has determined the participation of TBE and ESL students in the state mandated (MCAS) testing program and provides testing accommodations as appropriate to ensure equal participation of these students.</p>
	<p>Rating: Implemented District Response Required: Yes</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 15-23)
- Civil Rights Methods of Administration (MOA)
(Report Issues # MOA 1-6)
 - Title I (Report Issues # TI 5-9)
- Perkins Vocational and Technical Education (Report Issues # P 5-6)
- Transitional Bilingual Education (Report Issues # TBE 3-7)

CRITERION NUMBER	SPECIAL EDUCATION II. STUDENT IDENTIFICATION AND PLACEMENT	
	Legal Standard	
SE 15	Outreach by the School District (Child Find) 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: 1. professionals in community 2. private nursery schools 3. day care facilities 4. group homes 5. parent organizations 6. clinical /health care agencies 7. early intervention programs 8. other public/private/parochial schools 9. other agencies/organizations 10. the school itself, including charter schools 11. agencies serving migrant and/or homeless persons State Regulations Federal Requirements 300.125; 300.312	
	Rating: Not Implemented	District Response Required: yes

Department of Education Findings:

The district must show evidence of outreach to agencies and organizations that may have students in need of special education services. Interviews indicated that all administrators are not aware of this requirement.

CRITERION NUMBER		
	Legal Standard	
SE 16	Screening 1. The school district conducts screening for three and four year olds and for all children who are of age to enter kindergarten, designed to review a child's development and to assist in identification of those children who should be referred for an evaluation to determine eligibility for special education services. Participation in the screening program for three and four year olds is optional on the part of the parents. 3. Provision is made for ongoing and periodic screening of all students as required by the Department of Public Health (vision, hearing, and posture). State Regulations 28.03(1)(d) Chapter 71, section 57 Federal Requirements	
	Rating: Not Applicable	District Response Required:

CRITERION NUMBER	
	Legal Standard
SE 17	<p>Initiation of services at age three and Early Intervention transition procedures</p> <ol style="list-style-type: none"> 1. The school district encourages referrals from the Department of Public Health, other agencies, and individuals for young children when or before the child turns two-and-one-half years old in order to ensure continuity of services and to ensure the development and implementation of an IEP for eligible children by the date of the child's third birthday in accordance with federal requirements. 2. 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>State Regulations 28.06(7)(b)</p> <p>Federal Requirements 300.24(b)(3); 300.121(c); 300.132; 300.342(c)</p>
	<p>Rating: Not Applicable District Response Required:</p>

CRITERION NUMBER	
	Legal Standard
SE 18A	<p>IEP development and content</p> <ol style="list-style-type: none"> 1. Upon determining that the student is eligible for special education, the Team, including the parent(s), develops an IEP at the Team meeting using the evaluation data to guide development of measurable, annual goals and objectives/benchmarks for the student. If the district chooses to draft any element(s) of the IEP for discussion, the Team Chairperson ensures that those elements are genuinely considered prior to adoption at the Team meeting. All ideas and needs of the child as expressed by all Team members, especially the parents, are genuinely considered by the district prior to proposing the IEP. 2. The IEP includes specially designed instruction to meet the needs of the individual student and related services that are necessary to allow the student to benefit from the specially designed instruction, or consists solely of related services that are necessary to allow the student to access the general curriculum, consistent with federal and state requirements. 3. In developing the IEP, the Team proposes specially designed instruction and related services according to the needs of the child <u>and not</u> according to the availability of such instruction or related services.

CRITERION NUMBER			
	Legal Standard		
	<p>4. The IEP is completed addressing all elements of the most current IEP format provided by the Department of Education. Where applicable, the district includes in the IEP, or other notice to the parent, information regarding the implementation of any necessary restraint procedures for students as required under 603 CMR 46.00.</p> <p>5. If the Team members are unable to agree on the IEP, the Team chairperson states the elements of the IEP proposed by the school district.</p> <p>6. 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>7. The IEP is written in generally understandable language.</p>	<p>State Regulations 28.05(3), (4), (6) and (7) 28.06(2)</p>	<p>Federal Requirements 300.340-300.350; 300.343(a) 34 CFR Part 300, Appendix A, Question #22.</p>
	Rating: Implemented	District Response Required:	No

CRITERION NUMBER			
	Legal Standard		
SE 18B	<p>Determination of placement; provision of IEP to parent</p> <ol style="list-style-type: none"> 1. At the Team meeting, after the IEP has been fully developed, the Team determines the appropriate placement to deliver the services on the student's IEP. 2. Unless the student's IEP requires some other arrangement, the student is educated in the school that he or she would attend if the student did not require special education. 3. The decision regarding placement is based on the IEP, including the types of related services that are to be provided to the child, the type of settings in which those services are to be provided, the types of service providers, and the location at which the services are to be provided. 4. The placement selected by the Team is the least restrictive environment consistent with the needs of the student. 5. Immediately following the development of the IEP, and within 45 school working days after receipt of the parent's written consent to an initial evaluation or reevaluation, the district provides the parent with two (2) copies of the proposed IEP and proposed placement along with the required notice, except that the proposal of placement may be delayed according to the provisions of 603 CMR 28.06(2)(e) in a limited number of cases. 		

CRITERION NUMBER				
	Legal Standard			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center;">State Regulations 28.05(6) and (7)</td> <td style="width: 50%; text-align: center;">Federal Requirements 300.346</td> </tr> </table>	State Regulations 28.05(6) and (7)	Federal Requirements 300.346	
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Rating: Partially Implemented	District Response Required:	Yes		

Department of Education Findings:

Documentation and staff and student interviews indicated that all students are not provided equal access to all vocational classes (particularly no inclusion model in Regular Education Vocational shops, for example, Culinary Arts), and therefore placement is not always in the least restrictive environment. IEP's are not consistently provided within 3-5 days of the IEP Team meeting. (See SE 28)

CRITERION NUMBER				
	Legal Standard			
SE 19	<p>Extended evaluation If the Team finds a student eligible for special education and finds the evaluation information insufficient to develop a full or partial IEP, the Team, with the parents' consent, agrees to an extended evaluation period.</p> <ol style="list-style-type: none"> 1. The extended evaluation period is not used to deny programs or services determined to be necessary by the Team. If, prior to the extended evaluation, the Team determines that sufficient information is available to determine eligibility and to determine, in part, necessary annual goals and services, the Team writes a partial IEP that, if accepted by the parent, is immediately implemented by the district while the extended evaluation is occurring. 2. The extended evaluation period is not be used to allow additional time to complete the required assessments and does not deny programs and services to the student. 3. If the parent consents to an extended evaluation, the Team documents their findings and determines what evaluation time period is necessary and the types of information needed to determine eligibility and/or develop an IEP, if appropriate. The Team may decide to meet at intervals during the extended evaluation, but in all cases reconvenes promptly to make their eligibility determination and/or develop an IEP when the evaluation is complete. 4. The extended evaluation may extend longer than one week, but does not exceed eight school weeks. 5. The extended evaluation is not considered a placement. <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center;">State Regulations 28.05(2)(b)</td> <td style="width: 50%; text-align: center;">Federal Requirements</td> </tr> </table>	State Regulations 28.05(2)(b)	Federal Requirements	
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CRITERION NUMBER	
	Legal Standard
SE 20	<p>Least restrictive program selected</p> <ol style="list-style-type: none"> 1. The 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 that he or she needs. 2. If the student is removed from the general education classroom at any time, the Team states why the removal is considered critical to the student's program and 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. 3. The district does not remove an eligible child from the general education classroom solely because of needed modification in the curriculum. <p>State Regulations 28.06(2)(a)</p> <p style="text-align: right;">Federal Requirements 300.130; 300.550-300.556</p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

Interviews and a review of student records indicated that there is limited access and limited supports for special education students in regular education classes and vocational settings. Documentation did not address what procedures are followed when a child is removed from the general education classroom.

CRITERION NUMBER	
	Legal Standard
SE 21	<p>School day and school year requirements</p> <ol style="list-style-type: none"> 1. The school district ensures that every eligible elementary level student is scheduled to receive a minimum of 900 hours per school year of structured learning time and every secondary school student is scheduled to receive a minimum of 990 hours per school year of structured learning time unless otherwise provided for below. 2. The Team routinely considers the need for an educational program that is less than or more than the regular school day or school year, including extended day, or year, and/or residential services and indicates on the IEP why the shorter or longer program is necessary. 3. The daily duration of the child's program is equal to that of the regular school day unless the Team states that a different duration is necessary to provide a free appropriate public education to the child. 4. Specialized transportation schedules do not impede a student's access to a full

CRITERION NUMBER	
	Legal Standard
	<p>school day and program of instruction.</p> <p>5. An extended day or year program is identified if the student has demonstrated or is likely to demonstrate substantial regression in his or her learning skills and/or substantial difficulty in relearning such skills if an extended program is not provided.</p> <p>6. If residential services are required, the IEP clearly specifies the reasons for such determination and how such services will be coordinated with the day education services provided to the student. Additionally, the annual goals and services on the student's IEP reflects the comprehensive nature of the educational program required.</p> <p>7. Camping or recreation programs provided solely for recreational purposes and with no corresponding IEP goals or specially designed instruction are not to be considered for extended year programs.</p> <p>State Regulations 28.05(4) Chapter 69, section 1G</p> <p style="text-align: right;">Federal Requirements 300.309(b)</p>
	<p>Rating: Commendable District Response Required: No</p>

Department of Education Findings:

The district is commended for its numerous extended day and extended year programs for students that are apt to demonstrate substantial regression without such services. The Team routinely considers the need for these services.

CRITERION NUMBER	
	Legal Standard
SE 22	<p>IEP implementation and availability</p> <ol style="list-style-type: none"> 1. 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 provides the mutually agreed upon services without delay. 2. At the beginning of each school year, the district has an IEP in effect for each eligible student within its jurisdiction. 3. Each teacher and provider described in the IEP is informed of his or her specific responsibilities related to the implementation of the student's IEP. 4. The school district does not delay implementation of the IEP due to lack of classroom space or personnel, provides as many of the services on the accepted IEP as possible and immediately informs parents in writing of any delayed services, reasons for delay, actions that the school district is taking to address the lack of space or personnel and offers alternative methods to meet the goals on the accepted IEP. Upon agreement of the parents, the school district implements alternative methods immediately until the lack of space or personnel issues are

CRITERION NUMBER			
	Legal Standard		
	resolved.		
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations 28.05(7)(b); 28.06(2)(b)(2)</td> <td style="width: 50%;">Federal Requirements 300.342</td> </tr> </table>	State Regulations 28.05(7)(b); 28.06(2)(b)(2)	Federal Requirements 300.342
State Regulations 28.05(7)(b); 28.06(2)(b)(2)	Federal Requirements 300.342		
	Rating: Partially Implemented District Response Required: Yes		

Department of Education Findings:

Staff and parent interviews indicated that the school does not always have an IEP in effect at the beginning of the school year.

CRITERION NUMBER			
	Legal Standard		
SE 23	<p>Confidentiality of personally identifiable information The district protects the confidentiality of any personally identifiable information that is collected, used or maintained in accordance with federal and state law.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations 603 CMR 23.00 (Student Records Regulations)</td> <td style="width: 50%;">Federal Requirements 300.560-576; Family Educational Rights and Privacy Act (FERPA)</td> </tr> </table>	State Regulations 603 CMR 23.00 (Student Records Regulations)	Federal Requirements 300.560-576; Family Educational Rights and Privacy Act (FERPA)
State Regulations 603 CMR 23.00 (Student Records Regulations)	Federal Requirements 300.560-576; Family Educational Rights and Privacy Act (FERPA)		
	Rating: Implemented District Response Required: No		

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION II. STUDENT IDENTIFICATION AND PLACEMENT
	Legal Standard
MOA 1	<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 need special language assistance.</p> <p><i>Title VI; MGL, Ch.76, Section 5</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 2	<p>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</p>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

There is no documentation that the school has a policy in place to have shops or classrooms fully accessible to limited English proficient students. Bilingual aides are available in shops and classrooms only part of the time.

CRITERION NUMBER	
	Legal Standard
MOA 3	<p>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.</p> <p><i>Title II, Title VI, Title IX, S. 504, MGL, Ch.76, Section 5</i></p>
	Rating: Implemented District Response Required: No

Department of Education Findings: *See MOA 2*

CRITERION NUMBER	
	Legal Standard
MOA 4	<p>Placement of linguistic, racial minority and female/male students Patterns of placement in district programs and services for disabled students, linguistic and racial minority students, and females are consistent with patterns of placement for non-disabled students, linguistic and racial majority students, and males. If these patterns of placement are not consistent, the district is able to demonstrate that placements have been made for valid educational reasons.</p> <p><i>Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 5	<p>Placement of disabled students in occupational/vocational education programs When occupational/ vocational placement needs of disabled students are being considered:</p> <p>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</p> <p>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> <p><i>Title II, S. 504</i></p>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Observations, interviews and a review of student records indicated limited supports are available to accommodate disabled students in vocational certificate programs.

CRITERION NUMBER	
	Legal Standard
MOA 6	<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, and after giving birth are permitted to return to the same academic and extracurricular program as before the leave.</p> <p><i>Title IX</i></p>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

A review of documentation indicated that the school does not have a written policy that addresses the right of pregnant students to remain in school prior to and after the birth of a child.

CRITERION NUMBER	TITLE 1 II. STUDENT IDENTIFICATION AND PLACEMENT
	Legal Standard
TI 5	<p>Targeted Assistance Schools: a description is available of the multiple, objective, educationally-related criteria used to identify eligible students in grade 3 and above who are failing or most at-risk of failing to meet the high quality student performance and assessment standards required of all students.</p> <p><i>1115 (b)(1)(B) ESEA, IASA</i> <i>200.28 (Federal Register) CFR; 200.63 (c)(3)(i) (Federal Register) CFR.</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 6	<p>Targeted Assistance Schools: preschool through grade 2 students are selected based on teacher judgment, parental interviews and developmentally appropriate measures.</p> <p><i>1115 (b)(1)(B) ESEA, IASA</i></p>
	Rating: Not Applicable District Response Required:

CRITERION NUMBER	
	Legal Standard
TI 7	<p>Targeted Assistance Schools: The criteria for the identification of students are developed in consultation with parents, administrators, and pupil services personnel.</p> <p><i>1115 ESEA, IASA; 1112 (b)(6) ESEA, IASA</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 8	<p>There is evidence that students with limited-English proficiency are identified as eligible and selected for Title I services on the same basis as other children selected to receive services.</p> <p><i>1115(b)(2)(A)(i) ESEA, IASA; 200.63 (c)(3)(ii) (Federal Register) CFR</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 9	<p>There is evidence that students with special education needs are identified as eligible and selected for Title I services on the same basis as other children selected to receive services.</p> <p><i>1115(b)(2)(A)(i); 200.63 (c)(3)(ii) (Federal Register) CFR</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	PERKINS VOCATIONAL II. STUDENT IDENTIFICATION AND PLACEMENT
	Legal Standard
P5	<p>Career and technical education students are appropriately identified for Perkins funded services and activities. <i>(Section 135)</i></p>
	<p>Rating: Implemented District Response Required: Yes</p>

Department of Education Findings:

A review of documentation indicated that Keefe Tech's program of studies reflects the Perkins Act definition of vocational education; however, integrating the academic and technical courses into one unified program of studies would provide students a comprehensive approach for course/program selection.

CRITERION NUMBER	
	Legal Standard
P 6	<p>Special population students are appropriately identified for services and include the following groups:</p> <ul style="list-style-type: none"> • individuals with disabilities • individuals from economically disadvantage families, including foster children • individuals preparing for nontraditional training and employment • single parent, including single pregnant women • displaced homemakers • individuals with other barriers to educational achievement, including individuals with limited English proficiency <p><i>(Section 134)</i></p>
	<p>Rating: Implemented District Response Required: No</p>

Department of Education Findings:

Record review and staff and student interviews indicated that a bilingual aide is provided to assist with LEP students in academic classes

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION II. STUDENT IDENTIFICATION AND PLACEMENT
	Legal Standard
TBE 3	<p>The October 1 school census report identifies all students whose:</p> <ol style="list-style-type: none"> a. first language is not English, and b. who are not able to perform ordinary class work in English. <p><i>G.L. c. 71A, sec. 2 and 603 CMR 19(03)</i></p>
	<p>Rating: Implemented District Response Required: No</p>

Department of Education Findings:

A review of student records indicated that Keefe High School fulfills all of its obligations in identifying students whose first language is not English and who are not able to perform ordinary coursework in English. Keefe responds to all requests for data on October 1 as well as the new student information management system.

CRITERION NUMBER			
	Legal Standard		
<p>TBE 4</p>	<p>a. The school district shall establish procedures that use qualified staff and appropriate assessments to annually classify and evaluate each student considered for placement in Transitional Bilingual Education and to determine if the student is of limited English-speaking ability and is not able to perform ordinary class work in English.</p> <p>b. Such determination shall be placed in the student’s school record.</p> <p>c. The parent or guardian of any student resident in the school district may request and receive such an evaluation of her or his child.</p> <p><i>603 CMR 14.02 and G.L. c.71A, 2</i></p>		
	<p>Rating: Partially Implemented</p>	<p>District Response Required:</p>	<p>Yes</p>

Department of Education Findings:

A review of documentation indicated that Keefe has established the required procedures for its Spanish TBE program; however, the school should also have a TBE Portuguese program.

CRITERION NUMBER			
	Legal Standard		
<p>TBE 5</p>	<p>Placement procedures of limited English-speaking students are implemented district-wide as follows:</p> <p>a) when the district has fewer than twenty students of limited English-speaking ability from a particular language classification, the students receive native language and English language instruction, English as a Second Language, or other curriculum offerings of a supportive nature as appropriate. G.L. c.76, Sec. 5 and 603 CMR 26.03(4)</p> <p>b) when there are twenty or more students of limited English-speaking ability from the same language classification within the district, then the students are placed in an appropriate (by age and language) full-time TBE program</p> <p>The Transitional Bilingual Education program is a full-time program of instruction that includes:</p> <p>a) all courses required by law and by the school district taught in English and in the native language;</p> <p>b) reading and writing taught in the native language;</p>		

CRITERION NUMBER	
	Legal Standard
	c) oral comprehension, speaking, reading, and writing in English; d) courses in the history and culture of the native land of the students' parents; and e) courses in the history and culture of the United States. <i>G.L. c.71A, Sec. 1 and Sec. 2</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Interviews and a review of documentation indicated that Keefe fulfills the requirements for (a) of this section, but not for section (b) as there is no Portuguese TBE Program.

The school must provide a full time program of instruction for Portuguese students that includes:

- a) Reading and writing in Portuguese*
- b) Courses in the history and culture of Brazil*

CRITERION NUMBER	
	Legal Standard
TBE 6	If it is determined that a student who has spent three years in the TBE program has not attained the appropriate level of English language proficiency to perform at grade level, the student may continue in the TBE program at the discretion of the school committee and subject to the written approval of the parent/guardian. <i>G.L. c.71A, 2</i>
	Rating: Implemented District Response Required: No

Department of Education Findings:

Interviews and a review of documentation indicated that, if a student needed to continue in the TBE program, the school would do whatever would be necessary to ensure that such a student received the additional TBE scheduling, or support of another nature. (See also TBE 7)

CRITERION NUMBER	
	Legal Standard
TBE 7	<p>Transfer procedures of students from the bilingual to the monolingual program have been implemented on a district-wide basis as follows:</p> <p>a) no school committee shall transfer a student of limited English-speaking ability out of a program of TBE prior to the student's third year, unless:</p> <p style="padding-left: 40px;">(i) the parents approve of the transfer in writing; and the student receives a score on the examination of oral comprehension, speaking, reading and writing of English which reflects a level of English language skills appropriate to his/her grade level, OR</p> <p style="padding-left: 40px;">(ii) the parents request the transfer in writing. G.L. c.71A Sec. 2</p> <p>b) once a student is transferred into regular classes, the student continues to be provided with other curriculum offerings of a supportive nature as appropriate.</p> <p><i>G.L. c.76, Sec. 5 and 603 CMR 26.03(4)</i></p>
	<p>Rating: Implemented District Response Required: No</p>

Department of Education Findings:

Documentation and interviews indicated that student transfer is based upon recommendations, ESL grades, content class grades and test scores on the annual LAS Assessment, as well as number of years in the program. Parents can initiate transfer from the TBE Program prior to three years if done so in writing. Such students are monitored for progress in the mainstream and are allowed to return if it does not work out well and they choose to return.

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 24-32)
- Civil Rights Methods of Administration (MOA) (Report Issue # MOA 7)
 - Title I (Report Issues # TI 10-11B)
- Perkins Vocational and Technical Education (Report Issues # P 7-8)
 - Transitional Bilingual Education (Report Issue # TBE 8)

CRITERION NUMBER	SPECIAL EDUCATION III. PARENTAL INVOLVEMENT	
	Legal Standard	
SE 24	<p>Notice to parent regarding proposal or refusal to initiate or change the identification, evaluation, or educational placement of the child or the provision of FAPE</p> <ol style="list-style-type: none"> 1. A student may be referred for an evaluation by a parent or any person in a caregiving or professional position concerned with the student's development. 2. When a student is referred for an evaluation to determine eligibility for special education, the school district sends written notice to the child's parent(s) within 5 school days of receipt of the referral. 3. Notice is given by the district within a reasonable time for all other actions. 4. The school district provides the student's parent(s) with an opportunity to consult with the Special Education Administrator or his/her designee to discuss the reasons for the referral and the nature of the proposed evaluation 5. The district provides parents with an opportunity to consult with the Administrator of Special Education or his/her designee regarding the evaluators to be used and the proposed content of all required and optional assessments 6. The school district does not limit a parent's right to refer a student for timely special education evaluation because the district has not fully explored and/or attempted some or all of the available instructional support programs or other interventions available in general education that may be described in the district's Curriculum Accommodation Plan, including any pre-referral program. 7. The school district refuses to conduct an initial evaluation only when the circumstances of a student make clear that there is no suspicion of a disability and that there is no concern about the student's development. <p>State Regulations 28.04(1)</p> <p>Federal Requirements 300.503(a)</p>	
	Rating: Implemented	District Response Required: No

CRITERION NUMBER		
	Legal Standard	
SE 25	<p>Parental consent In accordance with state and federal law, the school district obtains informed parental consent as follows:</p> <ol style="list-style-type: none"> 1. The school district obtains written parental consent before conducting an initial evaluation or making an initial placement of a student in a special education program. Written parental consent is obtained before conducting a reevaluation and before placing a student in a special education placement subsequent to the initial placement in special education. 2. The school district obtains consent before initiating extended evaluation services. 	

CRITERION NUMBER			
	Legal Standard		
	<p>3. The school district obtains consent to the services proposed on a student's IEP before providing such services.</p> <p>4. The school district obtains consent prior to placing a student in an initial special education placement and for any subsequent placement.</p> <p>5. A parent is informed that consent may be revoked at any time. Except for initial evaluation and initial placement, consent may not be required as condition of any benefit to the child.</p> <p>6. When the participation or consent of the parent is required and the parent fails or refuses to participate, the attempts to secure the consent of the parent are implemented through multiple attempts using a variety of methods which are documented by the district. Such efforts may include letters, written notices sent by certified mail, electronic mail (e-mail), telephone calls, or, if appropriate, TTY communications to the home, and home visits at such time as the parent is likely to be home. Efforts may include seeking assistance from a community service agency to secure parental participation.</p> <p>7. If, subsequent to initial evaluation and initial placement and after following the procedures required by the regulations, the school district is unable to obtain parental consent to a reevaluation or to placement in a special education program subsequent to the initial placement, or the parent revokes consent to such reevaluation or placement, the school district considers with the parent whether such action will result in the denial of a free appropriate public education to the child. If, after consideration, the school district determines that the parent's failure or refusal to consent will result in a denial of a free appropriate public education to the student, it seeks resolution of the dispute through Special Education Appeals</p>		<p>State Regulations 28.07(1)</p> <p>Federal Requirements 300.500(b)(1)</p>
	Rating: Partially implemented	District Response Required:	Yes

Department of Education Findings:

Staff interviews indicated that the school has, on occasion, provided services on a student's IEP prior to receiving the parent signature.

CRITERION NUMBER			
	Legal Standard		
SE 26	<p><i>Parent participation in meetings</i></p> <p>1. <i>The district ensures that one or both parents of a child are members of any group that makes decisions on the educational placement of their child.</i></p> <p>2. <i>The Administrator of Special Education notifies parent(s) in writing of any Team meeting early enough to ensure that they have an opportunity to attend.</i></p>		

CRITERION NUMBER				
	Legal Standard			
	<p>3. <i>The district schedules the meeting at a mutually agreed upon time and place; and documents such efforts.</i></p> <p>4. <i>If neither parent can attend, the district uses other methods to ensure parent participation, including individual or conference telephone calls, or video conferencing.</i></p> <p>5. <i>In cases where the district, after reasonable efforts, is unable to obtain the parents' participation in Team meeting discussions and decisions, the district conducts the Team meeting and documents its attempts to facilitate the parents' participation.</i></p>			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations 28.02(22)</td> <td style="width: 50%;">Federal Requirements 300.345(d), 300.501</td> </tr> </table>	State Regulations 28.02(22)	Federal Requirements 300.345(d), 300.501	
State Regulations 28.02(22)	Federal Requirements 300.345(d), 300.501			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Rating: Implemented</td> <td style="width: 33%;">District Response Required:</td> <td style="width: 33%; text-align: right;">Yes</td> </tr> </table>	Rating: Implemented	District Response Required:	Yes
Rating: Implemented	District Response Required:	Yes		

Department of Education Findings:

Interviews and a review of documentation indicated that the school should employ a formal system to record the multiple attempts it employs to obtain parental participation.

CRITERION NUMBER				
	Legal Standard			
SE 27	<p>Content of Team meeting notice to parents</p> <p>1. The parent notice of an evaluation required by 603 CMR 28.04(1)(a) meets all of the content requirements set forth in MGL c.71B, §3, and in federal law and seeks the consent of the parent for any evaluation to occur, and provides the parent with the opportunity to express any concerns or provide information on the student's skills or abilities and to consult regarding the evaluators to be used.</p> <p>2. The parent notice of any Team meeting states the purpose, time and location of the meeting as well as who will be in attendance.</p>			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations 28.04(b)</td> <td style="width: 50%;">Federal Requirements 300.503-504</td> </tr> </table>	State Regulations 28.04(b)	Federal Requirements 300.503-504	
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	<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Rating: Implemented</td> <td style="width: 33%;">District Response Required:</td> <td style="width: 33%; text-align: right;">No</td> </tr> </table>	Rating: Implemented	District Response Required:	No
Rating: Implemented	District Response Required:	No		

CRITERION NUMBER	
	Legal Standard
SE 28	<p><i>Parent provided the IEP or notice of no eligibility together with notification of procedural safeguards and parents' rights</i> <i>Immediately following the development of the IEP and without undue delay, the district provides the parents with a copy of the proposed IEP or a written explanation of the finding of no eligibility for special education together with the required notice of procedural safeguards and parents' rights.</i></p> <p>State Regulations 28.05(7)</p> <p style="text-align: right;">Federal Requirements 300.345(f)</p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

Interviews and a review of student records indicated that the district does not always provide parents with a copy of the proposed IEP immediately upon development. Parents do not always leave the Team meetings with at least a copy of goals and the service delivery grid, nor receive a full proposed IEP within 3-5 days.

CRITERION NUMBER	
	Legal Standard
SE 29	<p>Communications are in English and primary language of home</p> <ol style="list-style-type: none"> 1. Communications with parents 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 and familiar with special education procedures, programs and services. 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. 2. If the district provides notices orally or in some other mode of communication that is not written language, the district keeps written documentation (1) that it has provided such notice in an alternate manner, (2) that the content of the notice and (3) the steps taken to ensure that the parent understands the content of the notice. <p>State Regulations 28.07(g)</p> <p style="text-align: right;">Federal Requirements 300.345(e)</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 30	<p>Elements of notice of parents' rights The district's notice of parental rights contains all required elements included in the most current version of the Massachusetts Parent's Rights Brochure.</p> <p>State Regulations <i>MGL c. 71B, Sec. 3</i></p> <p style="text-align: right;">Federal Requirements <i>300.503-504</i></p>
	<p>Rating: Implemented District Response Required: Yes</p>

CRITERION NUMBER	
	Legal Standard
SE 31	<p>State and district responsibility for educational surrogate parents</p> <ol style="list-style-type: none"> 1. When a student is without parental representation and requires an educational surrogate parent to be appointed in accordance with federal law and regulations, upon request of the Department, the district responsible for services to the student assists in identifying a person willing to serve as an educational surrogate parent. 2. Upon assignment by the Department, such educational surrogate parent has all the rights and responsibilities of a parent in making decisions regarding eligibility and services for special education for the assigned student. The Department provides notice of appointment to the school district and any state agency with custody of the student. 3. A person identified by the district and willing to serve as an educational surrogate parent has no conflict of interest and is not in the employ of the school district or any state or local agencies involved with the care of the student . 4. A person identified by the district, appointed by the Department, and serving as an educational surrogate parent does not receive financial remuneration from the district except that the school district reimburses the person for reasonable expenses related to the exercise of his or her responsibilities as an educational surrogate parent for a student enrolled in the district. <p>State Regulations <i>28.07(7)</i></p> <p style="text-align: right;">Federal Requirements <i>300.515</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION III. PARENTAL INVOLVEMENT		
	Legal Standard		
	<i>Title VI; MGL, Ch.76, Section 5</i>		
	Rating: Implemented	District Response Required:	No

CRITERION NUMBER	TITLE 1 III. PARENTAL INVOLVEMENT		
	Legal Standard		
TI 10	<p>The program demonstrates evidence of having met the following Title I requirements:</p> <ul style="list-style-type: none"> • parents are involved in writing, and have agreed upon, both the district’s and school ‘s written parental involvement policies; • plans/policies are developed which ensure that parents are involved in program planning, implementation and review; • parents are involved in a timely, organized, and ongoing manner in the planning, review, and improvement of programs; • parents are provided the following information in a timely manner: <ul style="list-style-type: none"> - school performance profiles and their child’s individual assessment results and interpretation of those results; - a curriculum description and explanation, forms of assessment used, and expected proficiency levels; - opportunities for regular meetings; - and timely responses to parental suggestions • parents are involved in School-Parent Compacts and annual assessment of the effectiveness of parent involvement; and • an annual Title I informational meeting is conducted for parents together with other pertinent meetings of interest to parents. <p><i>1118 (a)-(e) ESEA, IASA</i></p>		
	Rating: Partially Implemented	District Response Required:	Yes

Department of Education Findings:

District documentation and interviews indicated that policies do not ensure that parents are actively involved on an ongoing basis.

CRITERION NUMBER	
	Legal Standard
TI 11	All policies and procedures regarding parental involvement are in writing and available and/or distributed to Title I parents in a language and form that they can understand. <i>1118 (f) ESEA, IASA</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 11A	The district provides materials and training to Title I parents to enable them to improve their children’s achievement. (e.g., curriculum descriptions; school performance profiles) <i>1118(e)(2)(A) and (B)</i>
	Rating: Implemented District Response Required: No

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CRITERION NUMBER	
	Legal Standard
TI 11B	Parents of Title I students have equal opportunity to be represented on local School Councils. <i>The Education Reform Act of 1993</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	PERKINS VOCATIONAL III. PARENT AND COMMUNITY INVOLVEMENT	
	Legal Standard	
P 7	<i>Parents, students, teachers, representatives of business and industry, labor organizations, advisory committees and/or school councils, representatives of special populations, and other interested individuals are involved in the development, implementation and evaluation of career and technical programs. (Section 135)</i>	
	Rating: Implemented	District Response Required: No

Department of Education Findings:

Program advisory committee documentation and staff and student interviews indicated that advisory committee membership, participation and effectiveness is evident. Continued efforts are needed to ensure that the School Council, the School Improvement Plan and all Advisory Committees consistently reflect the needs of career and technical students.

CRITERION NUMBER		
	Legal Standard	
P 8	Appropriate information concerning career and technical education programs is provided to students and to their parents at least once a year before students enter the programs, and in no case later than the beginning of the ninth grade. Such information shall include: (a) the opportunities available in career and technical education (b) eligibility requirements for enrollment in career and technical programs (c) specific courses that are available (d) employment and/or further education opportunities; and (e) placement <i>(Section 135)</i>	
	Rating: Implemented	District Response Required: No

Department of Education Findings:

Interviews and documentation indicated that information concerning career and technical education programs are provided to students and their parents/guardians. The guidance department provides career information and counseling to all students.

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION III. PARENTAL INVOLVEMENT	
	Legal Standard	
TBE 8	Each school district required to provide Transitional Bilingual Education programs shall develop means for including parents or guardians of students participating in such programs in matters pertaining to their children’s education. This involvement may be through the development of a parent advisory council on Transitional Bilingual Education, through membership on a school-based council, or through other means determined by the district. <i>603 CMR 14.03(1)</i>	
	Rating: Implemented	District Response Required: No

Department of Education Findings:

Interviews and a review of student records indicated that Keefe High School involves the parents of TBE students as well as other low incidence language groups in every aspect of the school’s academic and extra-curricular offerings. Keefe does extensive outreach to TBE and low incidence families through written communication in English and native languages. Bilingual staff are on duty at any school initiated function such as Parents Night and social events. There is also one Hispanic member of the School Committee, one Bilingual Teacher on the School Council and an ESL High School Teacher on the High Schools That Work School Reform Steering Committee.

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 33-42)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 8-9)
 - Title I (Report Issues # TI 12-14F)
- Perkins Vocational and Technical Education (Report Issues # P 9-16)
 - Transitional Bilingual Education (Report Issues # TBE 9-11)

CRITERION NUMBER	SPECIAL EDUCATION IV. CURRICULUM AND INSTRUCTION		
	Legal Standard		
SE 33	<p>Involvement in the general curriculum</p> <ol style="list-style-type: none"> 1. District personnel reflect a full understanding of the connection between the Massachusetts Curriculum Frameworks and the expectations of the state for student performance as well as the rights of students with disabilities to be full participants in the general curriculum. 2. The district has either aligned its district curriculum with the Frameworks or has taken steps to provide students (including all students with disabilities) with essential learning opportunities that prepare the students to reach the state graduation standards. 3. At least one member of all IEP Teams is familiar with the general curriculum and is able to discuss an eligible student's appropriate access to the general curriculum. 4. In the IEP the district documents the student's participation in the general curriculum. <p>State Regulations 28.05(4)(a) and (b)</p> <p style="text-align: right;">Federal Requirements 300.347(a)(1)(i); 300.137</p>		
	Rating: Implemented	District Response Required:	No

CRITERION NUMBER	Legal Standard		
SE 34	<p>Continuum of alternative services and placements</p> <p>The district provides or arranges for the provision of each of the elements of the IEPs of students in need of special education from the ages of three through twenty-one, ensuring that a continuum of services and alternative placements is available to meet the needs of all students with disabilities, and takes all steps necessary to ensure compliance with all elements of the IEPs, including vocational education.</p> <p>State Regulations</p> <p style="text-align: right;">Federal Requirements 300.551;300.305; 300.123</p>		
	Rating: Partially Implemented	District Response Required:	Yes

Department of Education Findings:

Interviews, observation, and a review of documentation and student records indicated that the district offers many services and alternative placement opportunities. Although there is a continuum of services and placements, students are not as often provided these services in regular education classes especially in English, math and vocational areas. It is not clear how students may move within the continuum and what procedures are in place to provide inclusion programming.

CRITERION NUMBER	
	Legal Standard
SE 35	<p>Specialized materials and assistive technology</p> <ol style="list-style-type: none"> 1. Specialized materials and equipment specified in IEPs are provided, are of good quality and are suitable for the role they play in the IEP. 2. The 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>State Regulations Federal Requirements <i>34 CFR 300.308, 34 CFR 300.346</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 36	<p><i>IEP implementation, accountability and financial responsibility</i></p> <ol style="list-style-type: none"> 1. <i>The district ensures that IEPs are implemented without delay upon parent consent.</i> 2. <i>The district oversees in an ongoing manner the full implementation of each in-district and each out-of-district IEP it proposes which has been consented to by a child's parents.</i> 3. <i>The district makes a good faith effort to assist the child to achieve the goals and objectives or benchmarks listed in the IEP.</i> 4. <i>The district provides all programs and services without expense to the child's parents.</i> 5. <i>Each time the school district proposes to access the parent's private insurance proceeds to support the costs of IEP implementation, the school district obtains the parent's consent and informs the parents that their refusal to permit the school district to access their private insurance does not relieve the district of its responsibility to ensure that all required services are provided at no cost to the parents.</i> <p>State Regulations <i>28.06(3)</i> Federal Requirements <i>300.142; 300.350</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 37	<p>Procedures for approved and unapproved out-of-district placements</p> <ol style="list-style-type: none"> 1. <u>Individual student program oversight</u>: The school district monitors the provision of services to and the programs of individual students placed in public and private out-of-district programs. Documentation of monitoring plans and all actual monitoring are placed in the files of every eligible student who has been placed out-of-district. To the extent that this monitoring requires site visits, such site visits are documented and placed in the students' files for review. The duty to monitor out-of-district placements is not delegated to parents or their agents, to the Department of Education, or to the out-of-district placement. 2. <u>Student right to full procedural protections</u>: The school district retains full responsibility for ensuring that the student is receiving all special education and related services in the student's IEP, as well as all procedural protections of law and regulation. Any Team meetings conducted during the time that a student is enrolled in the out-of-district program are initiated by the school district in coordination with the out-of-district placement. 3. <u>Preference to approved programs</u>: The school district, in all circumstances, first seeks to place a student in a program approved by the Department pursuant to the requirements of 603 CMR 28.09. Preference is also given to approved programs located within the Commonwealth of Massachusetts if the choice of such program is consistent with the needs of the student and the choice of such program complies with LRE requirements. When an approved program is available to provide the services on the IEP, the district makes such placement in the approved program in preference to any program not approved by the Department. 4. <u>Written contracts</u>: At a minimum, the school district enters into written contracts with all public and private out-of-district placements. Such contracts meet the content requirements of 28.06(3)(f)(1-5). 5. <u>Use of unapproved programs</u>: A school district that places a student in a program that has not been approved by the Department according to the requirements under 603 CMR 28.09 ensures that such programs and services are provided in appropriate settings by appropriately credentialed staff able to deliver the services on the student's IEP. Students placed by the school district in such programs are entitled to the full protections of state and federal special education law and regulation. 6. <u>Placement documentation</u>: The following documentation is maintained by the school district pursuant to its placement of children in unapproved out-of-district programs: <ol style="list-style-type: none"> a. <u>Search</u>: The Administrator of Special Education documents the search for and unavailability of a program approved by the Department. The Administrator places such documentation in the student record. b. <u>Evaluation of facility</u>: The Administrator of Special Education or his/her designee thoroughly evaluates the appropriateness of any unapproved facility prior to placement of the student in such program. Such evaluation determines whether the unapproved facility can appropriately

CRITERION NUMBER			
	Legal Standard		
	<p>implement the student’s IEP in a safe and educationally appropriate environment. Such evaluation additionally determines whether the unapproved facility can and will provide the student with all the rights that are accorded to the student under state and federal special education law. Such evaluation is documented in detail and placed in the student record for review. To the extent that this evaluation requires a site visit, such site visits are documented and placed in the student record for review. The duty to evaluate the appropriateness of any unapproved facility is not delegated to the parents or their agents or the proposed unapproved facility.</p> <p>c. <u>School district approval to operate a private school in Massachusetts</u>: If services in an unapproved program are provided in a school setting, the Administrator of Special Education ensures that such school has received approval from the local school committee under MGL c.76, §1 and a copy of such approval is retained in the student record.</p> <p>d. <u>Pricing</u>: Pursuant to the requirements for Compliance, Reporting and Auditing for Human and Social Services at 808 CMR 1.00, the Administrator obtains pricing forms required to set program prices for programs receiving publicly funded students. Such pricing forms are completed by the proposed placement and document that the price proposed for the student’s tuition is the lowest price charged for similar services to any student in that program.</p> <p>e. <u>Notification of the Department of Education</u>: Prior to placement, if the Team determines that placement in such facility is appropriate, the Administrator notifies the Department of the intent to place the student and the name and location of the proposed placement. In addition, the Administrator forwards the notice of proposed placement and completed pricing forms to the Department along with the information on the proposed terms of the contract that will govern such placement and documentation of a monitoring plan pursuant to 603 CMR 28.06(3)(b). The district maintains any documentation of the Department’s objections to such placement and the steps the district has taken in regard to such objection. The district maintains documentation of the approved price for publicly funded students as set by the state agency responsible for setting program prices.</p> <p>f. <u>Out of state programs</u>: If out-of-district programs are provided in a placement outside of Massachusetts, and such school has not received approval by the Department under 603 CMR 28.09, the Administrator of Special Education ensures that such school has received approval from the host state.</p>		
	<p>State Regulations 28.02(13), 28.06(3)</p>	<p>Federal Requirements 300.2(c)</p>	
	Rating: Not Applicable	District Response Required:	No

CRITERION NUMBER	
	Legal Standard
SE 38	<p>Educational services in institutional settings (ESIS)</p> <p><u>Department of Education responsibility:</u> In cases where the Department provides certain special education services to eligible students in certain facilities operated by or under contract with the Department of Mental Health, the Department of Youth Services, County Houses of Corrections, or the Department of Public Health, the Department retains the discretion to determine, based upon resources, the type and amount of special education and related services that it provides in such facilities.</p> <p><u>School district responsibility:</u></p> <ol style="list-style-type: none"> 1. The district implements its responsibilities to students in institutional settings by acting on requests for evaluation, issuing proposed IEPs in a timely manner, and providing special education and/or related services in accordance with state and federal law. 2. Where a student's IEP requires a type or amount of service that the facility does not provide, it remains the responsibility of the parent's school district to implement the student's IEP by arranging and paying for the provision of such service(s). 3. The parent's school district coordinates with the state agency to ensure that the student receives an evaluation, an annual review, and special education services as identified at a Team meeting convened by the parent's school district. <p>State Regulations 28.06(9)</p> <p style="text-align: center;">Federal Requirements</p>
	<p>Rating: Not Applicable District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 39	<p>Procedures used to provide services to eligible students enrolled in private schools at private expense</p> <ol style="list-style-type: none"> 1. On or before December 1, the district determines the number of eligible private school students in consultation with private school representatives. 2. To the extent that the school district provides and pays for special education services for eligible students enrolled in private schools at private expense, the following requirements and procedures are implemented:

CRITERION NUMBER			
	Legal Standard		
	<p>a. The district provides special education and/or related services designed to meet the needs of eligible children who are attending private schools at private expense and whose parents reside in the jurisdiction of the school district. The school district provides to such children genuine opportunities to participate in the public school special education program consistent with state constitutional limitations.</p> <p>b. The district provides or arranges for the provision of evaluation services and an IEP for any eligible private school child whose parent resides in the jurisdiction of the school district. The evaluation may take place in the public school, the private school, or an appropriate contracted facility, and the school district ensures that a representative of the child's private school is invited to participate as a member of the Team pursuant to §28.05.</p> <p>c. The district provides or arranges for the provision of the special education and/or related services described by the child's IEP and the district ensures that special education services funded with state or local funds are provided in a public school facility or other public or neutral site. When services are provided using only federal funds, services are provided on public or private school grounds.</p> <p>d. The district does not withdraw or withhold services from a child solely because the school district has met the spending requirements of federal law.</p> <p>3. Special education services and/or related services provided by the district to a private school child are comparable in quality, scope, and opportunity for participation to that provided to public school children with needs of equal importance.</p> <p>4. The district ensures that programs in which both public and private school children participate do not include classes that are separated on the basis of school enrollment or the religious affiliation of the children.</p> <p>State Regulations <i>28.03(e)</i></p> <p>Federal Requirements <i>300.450-300.462</i></p>		
	Rating: Not Applicable	District Response Required:	No

CRITERION NUMBER	
	Legal Standard
SE 40	<p>Instructional grouping requirements for students aged five and older</p> <ol style="list-style-type: none"> 1. The size and composition of instructional groupings for eligible students receiving services outside the general education classroom are compatible with the methods and goals stated in each student's IEP. 2. Instructional grouping size requirements are maximum sizes and the school district exercises judgment in determining appropriate group size and supports for smaller instructional groups serving students with complex special needs. 3. When eligible students are assigned to instructional groupings outside of the general education classroom for 60% or less of the students' school schedule, group size does not exceed eight (8) students with a certified special educator, twelve (12) students if the certified special educator is assisted by one aide, and sixteen (16) students if the certified special educator is assisted by two aides. 4. For eligible students served in settings that are substantially separate, serving solely students with disabilities for more than 60% of the students' school schedule, the district provides instructional groupings that do not exceed eight (8) students to one certified special educator or twelve (12) students to a certified special educator and an aide. 5. After the school year has begun, if instructional groups have reached maximum size as delineated in paragraphs 3 and 4 of this criterion, the Administrator of Special Education and the certified special educator(s) providing services in an instructional group may decide to increase the size of an instructional grouping by no more than two additional students if the additional students have compatible instructional needs and then can receive services in their neighborhood school. 6. In such cases, the Administrator provides written notification to the Department and the parents of all group members of the decision to increase the instructional group size and the reasons for such decision. Such increased instructional group sizes are in effect only for the year in which they are initiated. 7. The district takes all steps necessary to reduce the instructional groups to the sizes outlined in paragraph 3 or 4 of this criterion for subsequent years. Such steps are documented by the district. <p>State Regulations 28.06(6)</p> <p style="text-align: right;">Federal Requirements</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 41	<p>Age span requirements The ages of the youngest and oldest child in any instructional grouping do not differ by more than forty-eight months. A written request for approval of a wider age range is submitted to the Commissioner of Education in cases where the district believes it is justified. Such requests are implemented only after approval of the Department of Education.</p> <p>State Regulations 28.06(6)(f)</p> <p style="text-align: right;">Federal Requirements</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 42	<p>Programs for young children three and four years of age <u>General requirements:</u></p> <ol style="list-style-type: none"> 1. The school district ensures programs are available for eligible children three and four years of age. Such programs shall be developmentally appropriate and specially designed for children ages three and four years. 2. Where at all possible the school district accepts referrals from the Department of Public Health, other agencies, and individuals for young children when or before the child turns two-and-one-half years old in order to ensure continuity of services and to ensure the development and implementation of an IEP for eligible children by the date of the child's third birthday in accordance with federal requirements. 3. Where appropriate, the school district elects, consistent with federal requirements to use the format and services of the Individualized Family Service Plan (IFSP), if appropriate, for an additional year as a means of transitioning eligible children to public school services. 4. Where appropriate the Team allows a child to remain in a program designed for three and four year old children for the duration of the school year in which the child turns five years old (including the summer following the date of the child's fifth birthday). <p><u>Types of Settings:</u></p> <ol style="list-style-type: none"> 5. <u>Inclusionary programs</u> for young children are located in a setting that includes children with and without disabilities and meet the following standards: <ol style="list-style-type: none"> a. Services in such programs are provided in the home, the public school, Head Start, or a licensed childcare setting.

CRITERION NUMBER				
	Legal Standard			
	<p>b. For public school programs that integrate children with and without disabilities, the class size does not exceed twenty (20) with one teacher and one aide and no more than five (5) students with disabilities. If the number of students with disabilities is six (6) or seven (7) then the class size does not exceed fifteen (15) students with one teacher and one aide.</p> <p>6. <u>Substantially separate programs</u> for young children are located in a public school classroom or facility that serves primarily or solely children with disabilities. Substantially separate programs adhere to the following standards:</p> <p>a. Substantially separate programs are programs in which more than 50% of the children have disabilities.</p> <p>b. Substantially separate programs operated by the district limit class sizes to nine (9) students with one teacher and one aide.</p>			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">State Regulations 28.06(7)</td> <td style="width: 50%;">Federal Requirements 300.342(c)</td> </tr> </table>	State Regulations 28.06(7)	Federal Requirements 300.342(c)	
State Regulations 28.06(7)	Federal Requirements 300.342(c)			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Rating: Not Applicable</td> <td style="width: 33%;">District Response Required:</td> <td style="width: 33%; text-align: right;">No</td> </tr> </table>	Rating: Not Applicable	District Response Required:	No
Rating: Not Applicable	District Response Required:	No		

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION IV. CURRICULUM AND INSTRUCTION		
	Legal Standard		
MOA 8	<p>Accessibility of extra curricular activities Extra curricular activities sponsored by the district are non-discriminatory in that:</p> <p>X the school provides equal opportunity for male and female students to participate in intramural and interscholastic sports</p> <p>X extracurricular activities or clubs sponsored by the school do not exclude students on the basis of race, sex, color, religion, national origin, sexual orientation and disability.</p> <p><i>Title II; Title IX ; S. 504; MGL, Ch.76, Section 5</i></p>		
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Rating: Commendable</td> <td style="width: 50%;">District Response Required: No</td> </tr> </table>	Rating: Commendable	District Response Required: No
Rating: Commendable	District Response Required: No		

Department of Education Findings:

The district offers a wide range of extracurricular activities. They include sports, clubs, student government and many others. All students are included and encouraged to participate.

CRITERION NUMBER	
	Legal Standard
MOA 9	<p>Promotional, recruitment, and employment practices of prospective employers of students</p> <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> <ul style="list-style-type: none"> X depicting students from both sexes and under represented groups in all pictorial representations 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 X requiring employers recruiting at the school to sign a statement that they do not discriminate in hiring or employment practices <p><i>Title I, Title VI, Title IX, S. 504, MGL, Ch.76, Section 5</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	TITLE 1 IV. CURRICULUM AND INSTRUCTION
	Legal Standard
TI 12 - TAS	<p>Title I services provided to students are designed to assist the students to meet the expectations and standards of the regular education curriculum and of the state curriculum frameworks.</p> <p><i>1115 (c)(1)(D) (ii) ESEA,IASA; 1001 (a)(1); 1001 (d)(1) ESEA,IASA</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 13 - TAS	<p>There is an established process for coordination and collaboration of Title I services with the instructional and assessment programs provided in regular education, special education, TBE/ESL, vocational education, early childhood (including Even Start and Head Start), and for the Homeless.</p> <p><i>1112 (b)(4)(A-B); 1115 (c)(1)(E); 1120(b)(a)ESEA, IASA</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 14 - TAS	<p>Efforts are being made to minimize removing students from the regular classroom during school hours. Title I inclusion services are provided in a manner to accelerate learning and do not result in in-class pull-out models.</p> <p><i>1115(c)(1)(D)(iii) ESEA, IASA</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 14A - TAS/SWP	<p>The school district provides opportunities for Title I students to participate in extended day/week/year programs and activities which may be funded through the integration of district resources.</p> <p><i>1115(c)(1)(D)(i) ESEA, IASA</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 14 - SWP	<p>A comprehensive Schoolwide Programs (SWP) plan has been developed with involvement of community to be served and individuals who will carry out the plan, including:</p> <ul style="list-style-type: none"> • teachers, principals and other staff, and where appropriate • pupil services personnel, • parents, and • secondary school students, if applicable. <p><i>1114(b)(2)(C)(ii) ESEA, IASA; 200.6(e)(2)(ii)(Federal Register)(CFR)</i></p>
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 14A - SWP	<p>The comprehensive SWP plan is in effect for the duration of the school's participation and reviewed and revised, as necessary, by the school.</p> <p><i>1114(b)(2)(C)(iii) ESEA, IASA; 200.6(e)(3) and (4)(Federal Register)(CFR)</i></p>
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 14B - SWP	<p>The SWP plan includes a comprehensive needs assessment of the entire school that is based on information on the performance of children in relation to the State content standards and the State student performance standards.</p> <p><i>1114(b)(1)(A) ESEA, IASA; 200.6(d)(1)(i)(Federal Register)(CFR)</i></p>
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 14C - SWP	The SWP plan includes reform strategies that provide opportunities for all children to meet the State’s proficient and advanced levels of student performance. <i>1114(b)(1)(B)(i) ESEA, IASA; 200.6(d)(2)(i) (Federal Register (CFR))</i>
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 14D - SWP	The district acts to fully implement its assurance that it provides technical assistance and support to schoolwide programs and works in consultation with these programs as they develop and implement such plans. <i>1112(c)(1)(B) and (C) ESEA, IASA</i>
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 14E - SWP	In providing technical assistance and support to schoolwide programs, the district ensures that the programs and plans contain all required schoolwide components and plan requirements. <i>1112(c)(1)(B); 1114(b)(1) and (2) (Federal Register)(CFR)</i>
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	
	Legal Standard
T1 14F - SWP	The schoolwide plan is made available to school district staff, parents, and the public, and the information contained in such plan is translated, to the extent feasible, into any languages that a significant percentage of parents of participating children in the school speak as their primary language. <i>1114(b)(2)(C)(iv) ESEA, IASA; 200.6(e)(2)(iii) and (iv) (Federal Register)(CFR)</i>

CRITERION NUMBER	
	Legal Standard
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	PERKINS VOCATIONAL IV. CURRICULUM AND INSTRUCTION
	Legal Standard
P 9	Strategies to improve academic success of all students exists. <i>(Section 135)</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Record reviews and student and staff interviews indicated course offerings need to be streamlined to provide opportunities for rigorous academic programs for all students. All academic offerings need to be aligned with Keefe Tech’s academic standards. Policies regarding student placement and course transfer need to be reviewed. Policies and strategies need to be developed and implemented for LEP students and ACCESS students including access to systems of extra help.

CRITERION NUMBER	
	Legal Standard
P 10	Strategies to improve career and technical skills of all students exist. <i>(Section 135)</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Record reviews, student and staff interviews indicated that LEP students are not provided sufficient support to improve career and technical skills. All career and technical programs and related courses need to be aligned with Keefe Tech’s academic standards.

CRITERION NUMBER	
	Legal Standard
P 11	(a) Technology is used to improve academic education. (Section 135) (b) Technology is used to improve career and technical education.
	Rating: Implemented District Response Required: No

Department of Education Findings:

Observations, interviews and a review of documentation indicated that all academic classrooms are equipped with at least one computer and current software. Professional development should be provided to assist instructors with using application software including spreadsheets and databases, as part of challenging projects.

Though shops/labs are equipped with state-of-the-art computers and current software, all vocational programs need continued evaluation, acquisition and maintenance of state-of-the-art technology. Professional development should be provided to assist instructors with using application software including spreadsheets and databases as part of challenging projects.

CRITERION NUMBER	
	Legal Standard
P 12	Linkages between secondary and postsecondary programs exist and are accessible to all students. (Section 135)
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Record reviews and student and staff interviews indicated that there is little to no linkage between secondary and postsecondary programs. The postsecondary opportunities like Tech Prep need to be more of a presence in the school culture (i.e., course selection guide, bulletin boards, staff training, etc.), and articulated pathways need to be developed and kept current.

CRITERION NUMBER	
	Legal Standard
P 13	All students are provided with strong experience in and an understanding of all aspects of a modern industry. <i>(Section 135)</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Staff interviews and class observations indicated that sporadic classroom instruction of all aspects of a modern industry is provided. Academic and career and technical curricula should include all aspects of a modern industry to ensure that it is provided to all students.

CRITERION NUMBER	
	Legal Standard
P 14	Instructional supplies and equipment meet the demands of the workforce. <i>(Section 135)</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

*Interviews and documentation indicated that *instructional supplies and equipment meet the demands of the workforce with the exception of the ACCESS program located in an area designated as the SHED (garage). All students must have access to supplies and equipment that meet the demands of the workforce.*

**(Note that M.G.L. c.74 603 CMR 4.07 (1) Each school ...shall demonstrate that it will be conducted in a suitable facility or facilities...that the location(s) meets modern occupational standards with respect to safety... (3) The Regulations of the Occupational Safety and Health Act governing work sites should serve as the minimum standards... M.G.L. c.74 603 4.08 (3) Such equipment shall meet or simulate modern occupational standards...)*

CRITERION NUMBER	
	Legal Standard
P 15	The required 15% minimum expenditure is being expended for activities consistent with the two priorities of the Massachusetts State Plan for Professional Development. <i>(Section 135)</i>
	Rating: Implemented District Response Required: No

Department of Education Findings:

Interviews and documentation indicated that the 15% set aside is expended for professional development that is impacting curriculum and instruction.

CRITERION NUMBER	
	Legal Standard
P16	Individuals who are members of special populations {which include (A) individuals with disabilities; (B) individuals from economically disadvantaged families, including foster children; (C) individuals preparing for nontraditional training and employment; (D) single parents, including single pregnant women; (E) displaced homemakers; and (F) individuals with other barriers to educational achievement including individuals with limited English proficiency} are provided with equal access to recruitment activities, admission and opportunities to a full range of courses of study without regard to race, color, gender, religion, national origin, English language proficiency, disability or sexual orientation, and with programs that enable them to meet or exceed state adjusted levels of performance. <i>(Section 122, Chapter 76, section 5 [Chapter 622], Title IX)</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Documentation and student and staff interviews indicated that all LEP students are not provided consistent and full day access to support services for technical programs. Efforts to provide further improved services and materials for LEP students and their parents need to be continued. Current Admissions materials must be reviewed and revised to meet current policy.

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION IV. CURRICULUM AND INSTRUCTION	
	Legal Standard	
TBE 9	<p>Upon placement in the TBE program, a notice is mailed to the parents in the following manner:</p> <ul style="list-style-type: none"> (i) not later than ten days after each student's enrollment; (ii) containing a simple, non-technical explanation of TBE; (iii) written in the primary/home language as well as in English; (iv) stating the parent's right to visit the TBE program; (v) stating the parent's right to withdraw the child; and (vi) stating the parent's right to a conference to discuss the TBE program. <p><i>G.L. c.71A, Sec. 2 and Sec. 5</i></p>	
	Rating: Implemented	District Response Required: No

Department of Education Findings:

Interviews and a review of documentation indicated that Keefe sends out an information packet in August that contains a letter in Spanish and Portuguese describing all of the essential items (i) - (vi). If a parent chooses to remove his/her child from the TBE program a copy of the letter is kept in the cumulative folder in the Guidance Office.

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION IV. CURRICULUM AND INSTRUCTION	
	Legal Standard	
TBE 10	<p><i>TBE students participate fully with their English-speaking contemporaries and are provided support in the regular public school classes for courses such as, but not limited to art, music, and physical education.</i></p> <p><i>G.L. c.71A, 5</i></p>	
	Rating: Partially Implemented	District Response Required: Yes

Department of Education Findings:

Interviews and observations indicated that in some of the shop and related classes there is little or no native language support for lower level (LEP and NEP) students. In visits to approximately seven shops, either teachers said it themselves or this DOE Reviewer noticed it. In two examples students were being used to translate material to other students. Native language aides are used for academic support, albeit insufficiently, in shops, related and academic areas.

CRITERION NUMBER	
	Legal Standard
TBE 11	The age span in any Transitional Bilingual Education class shall be no more than four years from the eldest to the youngest student, except that (1) the age span in any Transitional Bilingual Education kindergarten class shall be no more than three years and (2) the age span in any class in grades 9-12 shall be no more than five years. <i>G.L. c.71A, 5 and 603 CMR 14.05</i>
	Rating: Implemented District Response Required: No

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 43-49A)
- Civil Rights Methods of Administration (MOA)
(Report Issues MOA 10 –17A)
 - Title I (Report Issues # TI 15-18)
- Perkins Vocational and Technical Education (Report Issues # P 17-18)
- Transitional Bilingual Education (Report Issues # TBE 12-13)

CRITERION NUMBER	SPECIAL EDUCATION V. STUDENT SUPPORT SERVICES					
	Legal Standard					
SE 43	Behavioral interventions For a student whose behavior impedes their learning or the learning of others, the Team considers the student's behavior including positive behavioral interventions, ability to follow school discipline codes, any needed code modifications and the possible need for a functional behavioral assessment. <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">State Regulations</td> <td style="width: 50%; border: none;">Federal Requirements</td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;"><i>300.346</i></td> </tr> </table>		State Regulations	Federal Requirements		<i>300.346</i>
State Regulations	Federal Requirements					
	<i>300.346</i>					
	Rating: Partially Implemented	District Response Required: Yes				

Department of Education Findings:

Interviews and a review of documentation and student records indicated that the district does not use Functional Behavioral Assessments. The district should be using this assessment or comparable methods of determining if and how a student's behavior is impacting on learning, and develop a Behavioral Intervention Plan for all applicable students. A BIP should be used for each student in the ACCESS program to clearly identify individualized behavioral requirements for returning to the regular program.

CRITERION NUMBER						
	Legal Standard					
SE 44	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). <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">State Regulations</td> <td style="width: 50%; border: none;">Federal Requirements</td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;"><i>300.121(d)(2)</i></td> </tr> </table>		State Regulations	Federal Requirements		<i>300.121(d)(2)</i>
State Regulations	Federal Requirements					
	<i>300.121(d)(2)</i>					
	Rating: Implemented	District Response Required: No				

CRITERION NUMBER	
	Legal Standard
SE 45	<p>Procedures for suspension up to 10 days and after 10 days: General requirements</p> <ol style="list-style-type: none"> 1. All students, including eligible students with disabilities, receive prior written notice regarding the school's Code of Conduct. 2. The school's Code of Conduct includes required procedural safeguards such as opportunity for a hearing (per Goss v. Lopez). 3. Any eligible student may be suspended up to 10 days in any school year without implementation of procedures described in criterion SE 46 below. 4. After a student with special needs has been suspended for 10 days in any school year, during any subsequent removal the public school provides sufficient services for the student to continue to receive a free and appropriate public education. 5. The school provides 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. <p>State Regulation MGL c. 76, sec. 16-18 Chapter 71, section 37 H</p> <p style="text-align: right;">Federal Requirements 300.519-300.529</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
SE 46	<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> <ol style="list-style-type: none"> 1. 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. 2. Prior to a suspension that constitutes a change in placement of a student with disabilities, the Team convenes <ol style="list-style-type: none"> a. to develop or review a functional behavioral assessment of the student's behavior to modify a behavior intervention plan or develop an assessment plan; b. to identify appropriate alternative educational setting(s); and c. 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?)

CRITERION NUMBER	
	Legal Standard
	<p style="text-align: center;">Can student control behavior?).</p> <ol style="list-style-type: none"> 3. 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. 4. 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 <ol style="list-style-type: none"> a. if the behavior involves weapons or illegal drugs or another controlled substance while at school or a school function; or b. 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 c. 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. 5. 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. 6. 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>State Regulations Federal Requirements 300.519-300.528</p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

The description of the process in the Student Handbook on page 6 is outdated. It refers to old procedures for suspensions of more than ten days.

CRITERION NUMBER	
	Legal Standard
SE 47	<p>Procedural requirements applied to students not yet determined to be eligible for special education</p> <ol style="list-style-type: none"> 1. 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

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION V. STUDENT SUPPORT SERVICES
	Legal Standard
MOA 10	<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> <p>X notified that all programs, activities and employment opportunities are offered without regard to race, color, sex, religion, national origin, sexual orientation and disability</p> <p>X given the name(s), address(es) and telephone number(s) of Title VI, Title IX and Section 504 coordinator(s)</p> <p><i>Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 11	<p>Publication of notices of non-discrimination All publications for students, parents and employees, including written materials and other media used to publicize a school, specifically affirm that the school does not discriminate on the basis of race, sex, religion, national origin, sexual orientation or disability.</p> <p><i>Title VI; Title IX; Section 504; MGL, Ch.76, Section 5</i></p>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

A review of the submitted, 2001-2002, Integrated Academic Program of Studies has no non-discrimination statement.

CRITERION NUMBER	
	Legal Standard
MOA 12	<p>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.</p> <p><i>Title II, Title VI, Title IX, S. 504</i></p>
	Rating: Implemented District Response Required: NO

CRITERION NUMBER	
	Legal Standard
MOA 13	<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.</p> <p><i>Title VI, Title IX, S. 504</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 14	<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

CRITERION NUMBER	
	Legal Standard
X	and facilitate their access to all programs and services offered by the district support students in non-traditional educational and occupational pursuits for their gender <i>Title II, Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 15	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: 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 <i>Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 16	Notice to students who have left or are about to leave school without a high school diploma The district provides timely notice in writing (in English and the student's native language with a copy to parents) to students age 16-21 who have left or are about to leave school without obtaining a high school diploma or its equivalent and which

CRITERION NUMBER	
	Legal Standard
	<p>includes the following information:</p> <ul style="list-style-type: none"> a. their attendance is voluntary; b. their right to meet with a school representative to discuss the reasons for withdrawal; c. their rights to return to school; and d. all program options available to them. <p><i>MGL, Ch. 76, S.18</i></p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

There is no evidence in the documentation that the school uses a written notice to inform parents or students of issues related to leaving school without a high school diploma.

CRITERION NUMBER	
	Legal Standard
MOA 17	<p>Codes of conduct and student handbooks</p> <ol style="list-style-type: none"> 1. All school and district codes of conduct and student handbooks contain a nondiscrimination policy based on race, sex, religion, national origin, sexual orientation and disability. 2. The district has complaint resolution procedures that include the disciplinary measures that may be imposed upon students who harass or discriminate. 3. The principal of each school ensures that the district and school codes of conduct are distributed annually to students, parents and school personnel. <p><i>Title VI, Title IX, Section 504, MGL, Ch.76, Section 5</i></p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

The Student Handbook and the Manual for Teachers do not contain a nondiscrimination policy statement of sexual orientation or disability. The Manual for Teachers complaint procedures refers to an outdated procedure appeal to the DOE and Bureau of Equal Educational Opportunity.

CRITERION NUMBER	
	Legal Standard
MOA 17A	<p>Use of physical restraint on any student enrolled in a publicly funded education program</p> <ol style="list-style-type: none"> 1. The district has developed and implemented staff training at least annually on the use of restraint consistent with regulatory requirements. 2. The district administers physical restraint on students only when needed to protect a student and/or a member of the school community from imminent, serious, physical harm. The district implements restraint procedures consistent with Department of Education regulations in order to prevent or minimize any harm to the student as a result of the use of physical restraint. 3. The district has developed written procedures regarding appropriate responses to student behavior that may require immediate intervention. Such procedures are annually reviewed and provided to school staff and made available to parents of enrolled students. 4. The district has developed and implemented reporting requirements and procedures for administrators, parents and the Department of Education consistent with the regulations. 5. The district has developed and implemented any applicable individual waiver procedures consistent with the regulations. <p><i>603 CMR 46.00</i></p>
	<p>Rating: In Process District Response Required: Yes</p>

Department of Education Findings:

Interviews and a review of documentation indicated that the district has begun to train staff in passive restraint procedures but not all of the required training has occurred. Staff training needs to happen at least once per year. The district needs to develop written procedures as to how they deal with behaviors requiring immediate attention and intervention. See also SE 43 and P 18 in this component.

CRITERION NUMBER	TITLE 1 V. STUDENT SUPPORT SERVICES
	Legal Standard
TI 15	<p>The program design serves to supplement, not supplant:</p> <ul style="list-style-type: none"> • regular education • special education • transitional bilingual education • services for low incidence limited-English proficient students. <p><i>200.63 (Federal Register) CFR; 1115 (b)(2)(ii) ESEA, IASA</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 16	<p>Representatives from non-public school and/or Neglected or Delinquent (N or D) facilities are consulted and informed about the availability of Title I services and the priority needs of their schools.</p> <p><i>200.10 (a) (Federal Register) CFR</i></p>
	<p>Rating: Not Applicable District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 17	<p>The Title I services provided in non-public schools and N or D facilities are equivalent to those provided in public schools and minimize the use of pull-out program models.</p> <p><i>1120(a), 200.10 (a) (Federal Register) CFR; 200.11(b) (Federal Register) CFR</i></p>
	<p>Rating: Not Applicable District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 18	<p>Additional assistance is provided through teacher-parent conferences for any students not meeting the standards to discuss:</p> <ul style="list-style-type: none"> • what the school will do to help the student meet the standards; • what the family can do to help the student improve performance; and • additional assistance for the student at the school or elsewhere in the community. <p><i>1114(b)(1)(H)(iii)</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	PERKINS VOCATIONAL V. STUDENT SUPPORT SERVICES	
	Legal Standard	
P 17	Programs and services exist that support student participation in and completion of nontraditional training and employment activities. <i>(Section 135)</i>	
	Rating: Implemented	District Response Required: No

Department of Education Findings:

Documentation and student and staff interviews indicated that services are provided to support student participation in and completion of nontraditional training and employment activities.

CRITERION NUMBER		
	Legal Standard	
P18	The needs of students in alternative education programs are adequately addressed. <i>(Section 122)</i>	
	Rating: Not Implemented	District Response Required: Yes

Department of Education Findings:

*Documentation, staff and student interviews, and observations indicated that the ACCESS program does not adequately address the academic and technical needs of students placed into the program. There is no clear, defined process for student placement and services for the ACCESS Program. The programs including exploratory program for 9th grade students are not comparable to the *Chapter 74 approved programs provided to students who use Keefe Tech's main facility.*

***Academic instruction is provided by an instructor who does not have the appropriate teacher certifications to instruct all academic courses for all grade levels. The vocational facility does not meet minimum OSHA standards.*

**(Note that M.G.L. c.74 603 CMR 4.07 (1) Each school ...shall demonstrate that it will be conducted in a suitable facility or facilities...that the location(s) meets modern occupational standards with respect to safety... (3) The Regulations of the Occupational Safety and Health Act governing work sites should serve as the minimum standards...)*

****(Note that M.G.L. c.74 603 CMR 4.10 (3) Teachers of academic subjects taught in a vocational technical programs shall be certified in their respective areas of instruction...)*

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION V. STUDENT SUPPORT SERVICES		
	Legal Standard		
TBE 12	<p>The school district shall ensure that limited-English speaking students have equal access to the educational services and extracurricular activities available to other students in the school district.</p> <p><i>603 CMR 14.06; 603 CMR 26.08(1) G.L. c.71A, 5; G.L. c.76, 5; 603 CMR 26.06(1) and 26.08(1)</i></p>		
	Rating: Implemented	District Response Required:	No

Department of Education Findings:

The school ensures that there is equal access for all such activities. Visits to classes and written documentation supports this. Further interviews and visual inspection gave sufficient evidence that limited-English speaking students have equal access to the educational services and extracurricular activities available to other students in the school.

CRITERION NUMBER			
	Legal Standard		
TBE 13	<p>All students, including bilingual students, are notified in their primary language of the provisions of G.L.c.76, 5 (Place of Attendance; Anti-Discrimination) and 603 CMR 26.00 (C.622). In addition, all students enrolled in TBE programs are notified in their primary language of the provisions of the Student Record Regulations.</p> <p><i>603 CMR 23.00. 603 CMR 26.08(5)</i></p>		
	Rating: Implemented	District Response Required:	No

Department of Education Findings:

Students and parents are notified of their rights on the school application and in the Student Handbook, which is fully translated in Portuguese and Spanish.

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. Additionally, the component examines whether the district implements an effective system of program leadership and oversight which fosters high standards and performance expectations for all students and staff consistent with the goals of applicable federal and state requirements and Education Reform Act of 1993.

:

- Special Education (Report Issues # SE 50-54)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 18-21)
 - Title I (Report Issues # TI 19-23)
- Perkins Vocational and Technical Education (Report Issue # P 19)
 - Transitional Bilingual Education (Report Issues # TBE 15-17)

CRITERION NUMBER	SPECIAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
SE 50	<p>Responsibilities of the School Principal and Administrator of Special Education <u>Principal:</u></p> <ol style="list-style-type: none"> 1. <u>Instructional support.</u> The principal in each of the district's schools promotes instructional practices responsive to student needs and ensures that adequate instructional support is available for students and teachers. Instructional support includes remedial instruction for students, consultative services for teachers, availability of reading instruction at the elementary level, appropriate services for linguistic minority students, and other services consistent with effective educational practices and the requirements of MGL c. 71B, §2. The principal consults with the Administrator of Special Education regarding accommodations and interventions for students. Such efforts and their results are documented and placed in the student record. Additionally, when an individual student is referred for an evaluation to determine eligibility for special education, the principal ensures that documentation on the use of instructional support services for the student is provided as part of the evaluation information reviewed by the Team when determining eligibility. 2. <u>Curriculum Accommodation Plan.</u> The principal implements a curriculum accommodation plan adopted by the district to ensure that all efforts have been made to meet the needs of diverse learners in the general education program. The plan assists the regular classroom teacher in analyzing and accommodating diverse learning styles of all children in the regular classroom and in providing appropriate services and support within the regular education program including, but not limited to, direct and systemic instruction in reading and provision of services to address the needs of children whose behavior may interfere with learning. The Plan includes teacher training in (1) analyzing and accommodating diverse learning styles of all students in order to achieve an objective of inclusion in the regular classroom of students with diverse learning styles; (2) methods of collaboration among teachers, paraprofessionals and teacher assistants to accommodate such styles; and (3) training in the provision of pre-referral services within regular education, teacher mentoring and collaboration and parental involvement. 3. <u>Coordination with special education.</u> The principal with the assistance of the Administrator of Special Education coordinates the delivery and supervision of special education services within each school building. 4. <u>Educational services in home or hospital.</u> Upon receipt of a physician's written order verifying that any student enrolled in a public school or placed by the public school in a private setting must remain at home or in a hospital on a day or overnight basis, or any combination of both, for medical reasons and for a period of not less than fourteen school days in any school year, the principal arranges for provision of educational services in the home or hospital. Such services are provided with sufficient frequency to allow the student to continue his or her educational program, as long as such services

CRITERION NUMBER	SPECIAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
	<p>do not interfere with the medical needs of the student. The principal coordinates such services with the Administrator for Special Education for eligible students. Such educational services are not be considered special education unless the student has been determined eligible for such services, and the services include services on the student's IEP.</p> <p><u>Administrator of Special Education:</u></p> <p>5. The school district has an appointed person to be its Administrator of Special Education. The Administrator supervises all special education for the school district and ensures compliance with all federal and state special education laws. As appropriate, and in accordance with the requirements of MGL c.71B, §3A, the Administrator may designate other school district personnel to carry out some of the duties of the Administrator.</p> <p>State Regulations 28.03(3) <i>Chapter 71, sec. 38Q and 38Q ½ as amended by FY '01 State Budget Out Side Sections 146 and 147</i></p> <p style="text-align: right;">Federal Requirements</p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

The district has not begun to develop a District Curriculum Accommodation Plan, (DCAP).

CRITERION NUMBER	
	Legal Standard
SE 51	<p>Appropriate special education teacher certification Individuals who design and/or provide direct special education services described in IEPs, or who supervise the provision of special education services by other teachers or paraprofessionals, are appropriately certified.</p> <p>State Regulations 28.02(3) 603 CMR 7.00</p> <p style="text-align: right;">Federal Requirements 300.23; 300.36</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER		
	Legal Standard	
SE 52	<p>Appropriate certifications or other credentials -- related services Any person, including non-educational personnel, who provides related services described under federal special education law, 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.</p> <p>State Regulations 28.02(3)</p> <p>Federal Requirements 300.23; 300.24; 300.136</p>	
	Rating: Implemented	District Response Required: No

CRITERION NUMBER		
	Legal Standard	
SE 53	<p>Use of paraprofessionals</p> <ol style="list-style-type: none"> 1. Paraprofessionals and assistants (e.g., teacher aides, tutors and student teachers) are appropriately trained to assist in providing special education or related services. 2. Persons employed as paraprofessionals and assistants do not design instruction for students with disabilities but are expected to implement instruction under the supervision of an appropriately certified or licensed professional who is proximate and readily available to provide such supervision. <p>State Regulations</p> <p>Federal Requirements 300.136(f)</p>	
	Rating: Implemented	District Response Required: No

CRITERION NUMBER	
	Legal Standard
SE 54	<p>Professional development regarding special education</p> <ol style="list-style-type: none"> 1) The district considers the needs of all staff in developing training opportunities for professional and paraprofessional staff and provides a variety of offerings which at a minimum include the following training topics offered on an annual basis: 2) state and federal special education requirements and related local special education policies and procedures; 3) confidentiality of student records; 4) training in analyzing and accommodating diverse learning styles of all students in order to achieve an objective of inclusion in the regular classroom of students with diverse learning styles; 5) methods of collaboration among teachers, paraprofessionals and teacher assistants to accommodate diverse learning needs of all students in the regular classroom; 6) training in the provision of pre-referral services within regular education, teacher mentoring and collaboration and parental involvement; 7) training for all locally hired <u>and</u> contracted transportation providers on the unique needs of all students being transported in regular and special transportation vehicles; and 8) in cooperation with the special education parent advisory council, at least one workshop annually within the district on the rights of students and their parents and guardians under the state and federal special education laws and makes written materials explaining such rights available upon request. <p>State Regulations <i>Chapter 71, sec. 38g 28.03(1)(a) Chapter 71, sec. 38Q and 38Q ½ as amended by FY '01 State Budget Out Side Sections 146 and 147</i></p> <p style="text-align: right;">Federal Requirements 300.382</p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

Staff interviews and documentation indicated that some required training is not offered annually; specifically, a review of state and federal special education requirements, training for transportation providers, confidentiality of student records and joint training conducted with the special education parent advisory council.

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> <p><i>Title I, Title VI, Title IX, S. 504</i></p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

Documentation was not found of any procedures or policies that address these issues.

CRITERION NUMBER	Legal Standard
MOA 19	<p>Employment application and interview procedures Job application forms and interview questions do not include inquiries regarding a candidate's race, ethnicity, age, marital and parental status, national origin, physical attributes, religious background, health, health history and physical or mental condition.</p> <p><i>Title I, Title VI, Title IX, S. 504</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	Legal Standard
MOA 20	<p>Non-discriminatory personnel policies and procedures District personnel policies and procedures are free of discrimination and bias in the following areas:</p> <ul style="list-style-type: none"> 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

CRITERION NUMBER	
	Legal Standard
	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. <i>Title I, Title VI, Title IX, S. 504</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Documentation of Non-discriminatory personnel policies and procedures was not provided, although interviews indicated that staff felt the policies were non-discriminatory.

CRITERION NUMBER	
	Legal Standard
MOA 21	Staff training regarding civil rights responsibilities The district provides in-service training for all school personnel at least annually regarding civil rights responsibilities, including the prevention of discrimination and harassment on the basis of disability, race, color, sex, religion, national origin and sexual orientation and the appropriate methods for responding to it in the school setting. <i>Title VI, Title IX, S. 504, MGL, Ch. 76, Section 5</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Staff interviews and a review of the documentation indicated this training has not been provided annually for all staff.

CRITERION NUMBER	TITLE 1 VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
TI 19	All professional staff providing Title I services are appropriately certified or hold current waivers for their job title and function. <i>Chapter 71, 38G</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 20	Teacher aides work under the direct supervision and in close proximity of certified teachers who are employed in that capacity. <i>1119 (I)(1)(c) ESEA, IASA</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 21	Professional development activities: <ul style="list-style-type: none"> • support instructional practices that are conducive to the high achievement and challenging content expectations of the state's education reform efforts (e.g., Curriculum Frameworks); and • are provided to all of the district's instructional staff who serve Title I eligible students. <i>1119 (b)(1)(A) ESEA, IASA</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 22	Title I professional development activities are designed by principals, teachers, and other school staff to ensure that Title I students' needs are addressed. The district devotes sufficient resources to effectively carry out its responsibilities for professional development. <i>1119 (a)(2) ESEA, IASA; 1114(b)(1)(H)(i).</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 23	Each school identified to be in need of improvement, as part of its school improvement plan, improves the skills of its staff by providing effective professional development activities and by devoting to such activities, over a period of 2 consecutive years, an amount equivalent to 10% of the Part A funds received by the school during 1 fiscal year (or otherwise document how the school is effectively carrying out professional development activities. Decisions about the use of these funds are made by teachers, principals, and other school staff in that school. <i>1116(c)(3)(A)(i), (ii), and (C) ESEA, IASA</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	PERKINS VOCATIONAL VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
P 19	All career and technical education staff in Perkins eligible programs appropriately certified, approved, or otherwise qualified. (<i>M.G.L. c.74 s. 18, M.G.L. c.71.s.38G</i>)
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Documentation and staff interviews indicated that not all technical staff members are certified in the technical area that they are currently teaching (egs.: Culinary; CAD; Information Systems; Auto Tech; Metal Fabrication; all academic subjects for ACCESS program and all technical areas for ACCESS program, i.e., exploratory program).

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION
	Legal Standard
TBE 15	The school district provides the following personnel for its TBE Programs: a) certified TBE teachers, G.L. c.71A, Sec. 6 B) CERTIFIED ESL TEACHERS, G.L. C.71, SEC. 38G c) native language teacher aides if class ratio exceeds maximum, 603 CMR 14.04 d) an individual to be responsible for administration of the programs. 603 CMR 14.01(2)
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Documentation and staff interviews indicated that there is one aide that acts in the position as an 'Associate Teacher'. Because she pulls out Spanish speaking students and teaches them in a specific classroom and subject areas on her own, she needs to be certified or working towards certification. Also there is no Portuguese Bilingual teacher and therefore no Portuguese TBE Program by definition. Observations indicated there is insufficient coverage in numerous shops and related classes.

CRITERION NUMBER	
	Legal Standard
TBE 16	The maximum student-teacher ratio for Transitional Bilingual Education classes grades K-12 shall be an average of 20:1, except that the student-teacher ratio may be an average of 25:1, where a teacher's aide is assigned to the class. No individual class enrollment may be larger than the largest regular education class at the same grade level(s). <i>G.L. c.71A, 5 and 603 CMR 14.05</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TBE 17	The school district is implementing a professional development plan that addresses the need for training and skills for all staff in second language acquisition and in working with culturally and linguistically diverse student populations. <i>G.L. c.71, 59C</i>
	Rating: Implemented District Response Required: No

Department of Education Findings:

Documentation and staff interviews indicated programs on the second language acquisition and issues involved in working with culturally diverse students are provided. Spanish and Portuguese conversation classes have been offered. All of these courses can be taken for professional development and PDP's. Teachers are allowed a certain amount of professional development allowance as part of their contract (\$750 per year). They can take courses at Keefe or at local colleges. All courses are taught by trained professionals.

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)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 22-23)
 - Perkins Vocational and Technical Education (Report Issue # P 20)
 - Transitional Bilingual Education (Report Issues # TBE 18-19)

CRITERION NUMBER	SPECIAL EDUCATION VII. SCHOOL FACILITIES
	Legal Standard
SE 55	<p>Special education facilities and classrooms</p> <ol style="list-style-type: none"> 1. The school district provides facilities and classrooms for eligible students which maximize the inclusion of such students into the life of the school; 2. provide accessibility in order to implement fully each child's IEP; 3. are at least equal in all physical respects to the average standards of general education facilities and classrooms; and 4. are given the same priority as general education programs for access to and use of instructional and other space in public schools in order to minimize the separation or stigmatization of eligible students. <p>State Regulations <i>28.03(b)</i></p> <p>Federal Requirements <i>Section 504 of the Rehabilitation Act of 1973</i></p>
	Rating: Commendable District Response Required: No

Department of Education Findings:

All classrooms and facilities are accessible and equal in all respects to general education classroom and facilities.

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION VII. SCHOOL FACILITIES
	Legal Standard
MOA 22	<p>Accessibility of district programs and services for students with limited physical mobility</p> <p>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).</p> <p><i>Title II of the Americans with Disabilities Act; S. 504; MGL, Ch. 71B; Individuals with Disability Act (IDEA-97)</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
MOA 23	<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:</p> <p>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;</p> <p>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.</p> <p><i>Title II, Title VI, Title IX, S. 504, MGL, Ch. 76, Section 5</i></p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

Observations indicated that the majority of the facilities are commendable, with the exception of the ACCESS Program. (See Criteria P 18 in Component V)

CRITERION NUMBER	PERKINS VOCATIONAL VII. SCHOOL FACILITIES
	Legal Standard
P 20	<p>Instructional facilities meet the demands of the workforce including those for state of the art facilities as well as for a healthy, safe environment.</p> <p><i>(Section 122 and Sec. 135)</i></p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

The development and implementation of the Annual Programmatic Review along with the implementation of the Facility Checklist is commendable; however, all of the findings, including those of the Keefe Tech Safety Committee, as a result of the needs assessment process, should be addressed, implemented and completed.

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION VII. SCHOOL FACILITIES	
	Legal Standard	
TBE 18	Whenever feasible, the TBE program is located in regular public schools rather than separate facilities. <i>G.L. c.71A, 5</i>	
	Rating: Not Applicable	District Response Required:

CRITERION NUMBER		
	Legal Standard	
TBE 19	TBE classrooms are comparable to those provided for regular education students (including physical characteristics, materials, and equipment). <i>G.L. c.71A, 1; G.L. c.76, 5; 603 CMR 26.03(4)</i>	
	Rating: Implemented	District Response Required: Yes

Department of Education Findings:

TBE/ESL classes are located on the third floor in the same area as mainstreamed classes and special education classes. The classrooms are near the Media Center and the library. The Bilingual Guidance Counselor is located in the Guidance Office and the Bilingual Department secretary is located in the main office.

There could be more translated text/handout material for TBE students as well as software or other devices that could translate shop instructions, for times when aides are not present.

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 56)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 24-25)
 - Title I (Report Issues # TI 24-26)
- Perkins Vocational and Technical Education (Report Issue # P 21)
 - Transitional Bilingual Education (Report Issue # TBE 20)

CRITERION NUMBER	SPECIAL EDUCATION VIII. PROGRAM PLAN AND EVALUATION
	Legal Standard
SE 56	<p>Special education programs and services are evaluated</p> <ol style="list-style-type: none"> 1. Special education programs, services and administrative areas are regularly evaluated. 2. The district develops methods for determining the effectiveness of programs in assisting students with disabilities to achieve the goals set forth in their IEPs in the least restrictive environment. 3. The 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. 4. As part of these evaluation procedures, the district measures the success of programs based on students' local and statewide assessment results, drop out rates and graduation rates for special education students. <p>State Regulations Chapter 71B Chapter 71, sec. 59C</p> <p style="text-align: right;">Federal Requirements 300.137</p>
	<p>Rating: Partially Implemented District Response Required: Yes</p>

Department of Education Findings:

Interviews and a review of documentation indicated that there is no comprehensive method for evaluating the effectiveness of programs within the district. The district has sent out a parent survey, but more extensive and measurable procedures must be incorporated. The Parent Advisory Council needs to be involved in the program evaluation process.

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION VIII. PROGRAM PLAN AND EVALUATION
	Legal Standard
MOA 24	<p>Curriculum review process</p> <p>The district has a process to ensure that teachers in the district regularly review all instructional and educational materials for simplistic and demeaning generalizations, lacking intellectual merit on the basis of disability, race, color, sex, religion, national origin and sexual orientation.</p> <p><i>MGL, Ch.76, Section 5; 603 CMR 26.05(2)</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
MOA 25	<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.</p> <p><i>Title VI; Title IX; S. 504; MGL, Ch.76, Section 5</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	TITLE 1 VIII. PROGRAM PLAN AND EVALUATION
	Legal Standard
TI 24	<p>A needs assessment and data analysis is conducted annually in each school to determine the types of programs and services to be provided to Title I students. Such assessment is conducted in consultation with school staff and parents.</p> <p><i>1115 (c)(2)(B); IASA 1114 (b)(1)(A) ESEA, IASA</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 24A	<p>The effectiveness of the Title I program/services at each school is evaluated on at least an annual basis, and Title I program changes are implemented which reflect the recommendations of this evaluation. The Title I Schoolwide Plan is integrated into the school's Improvement Plan.</p> <p><i>1115 (c)(2)(B)ESEA, IASA</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 25	<p>Each Title I school identified in need of improvement develops an improvement plan in consultation with parents, the district, and the school support team, or revises its school plan in a manner that demonstrates the greatest likelihood of improving the performance of participating children.</p> <p><i>1116(c)(2)(C)(i) ESEA, IASA</i></p>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

District documentation and interviews indicated that the improvement plan needs to be revised to focus in a manner that demonstrates the greatest likelihood of improving the performance of participating children.

CRITERION NUMBER	
	Legal Standard
TI 26	<p>For districts with one or more Title I schools identified as in need of improvement, the district:</p> <ul style="list-style-type: none"> • provides technical or other assistance as the school develops and implements or revises its school improvement plan. (Such technical assistance may be provided directly or by other entities with experience in helping schools improve achievement.); • (for the 2002-2003 school year) implements corrective action in the identified school during the third year following identification, if the school continues to fail to make adequate yearly progress (e.g., withhold funds, revoke authority to operate a schoolwide program, reconstitution of school staff, etc.); and • provides as many students as possible in an identified school with the opportunity to transfer to another school in the district not in need of improvement. <p><i>1116©(4) and (5) ESEA, IASA 2763A-32 of P.L. 106-554 (Education Appropriations Act, 2001)</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	PERKINS VOCATIONAL VIII. PROGRAM PLAN AND EVALUATION
	Legal Standard
P 21	<p>The school has developed and implemented a system of program evaluation that includes, at a minimum, the following four core indicators: (Section 116)</p> <p>(i) Student attainment of challenging State established academic and career and technical skill proficiencies.</p> <p>(ii) Student attainment of a secondary school diploma or its recognized equivalent, proficiency credentials in conjunction with a secondary school diploma or a post secondary degree or credential.</p> <p>(iii) Placement in, retention in, and completion of, postsecondary education or advanced training, placement in military service, or placement or retention in employment/</p> <p>(iv) Student participation in and completion of career and technical education programs that lead to nontraditional training and employment.</p>
	Rating: Implemented District Response Required: No

Department of Education Findings:

Document review, classroom observations and staff interviews indicated that an annual program review process was developed and is in the initial stages of implementation. The program evaluation process includes the four core indicators outlined in Perkins III, identifies areas of strength, makes recommendations, and has a process for correcting any deficiencies. Other programmatic offerings should develop a similar program review process. This should include student support services, academic offerings and cooperative education.

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION VIII. PROGRAM PLAN AND EVALUATION
	Legal Standard
TBE 20	<p>The school district provides information as requested to the Department of Education that describes an Annual Performance Evaluation of its program of Transitional Bilingual Education in accordance with <i>G.L. c.69, 11, 10.</i></p>
	Rating: Implemented District Response Required: No

Department of Education Findings:

A review of documentation indicated that Keefe provides all relevant data for the October 1 reports and the Student Information Management System. Keefe does its own annual performance evaluations.

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 57-58)
 - Title I (Report Issues # TI 27-29A)
- Perkins Vocational and Technical Education (Report Issue # P 22)
 - Transitional Bilingual Education (Report Issue # TBE 21)

CRITERION NUMBER	SPECIAL EDUCATION IX. RECORD KEEPING	
	Legal Standard	
SE 57	<p>Special education child count</p> <ol style="list-style-type: none"> 1. A child count is maintained representing students with current, accepted IEPs who are provided, at a minimum, direct special education and/or related 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 and does not reveal the identity of individual students or their parents. 2. The child count also 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 IEPs developed by the district. 3. The district does not include as part of its special education child count students who are determined by the Department to be erroneously classified as eligible to be counted under federal or state special education requirements or who are no longer receiving special education and/or related services. <p>State Regulations 603 CMR 23.00</p> <p>Federal Requirements 300.750-754; 300.145; 300.560-300.577; <i>Family Educational Right and Privacy Act (FERPA)</i>; 300.133</p>	
	Rating: Partially Implemented	District Response Required: Yes

Department of Education Findings:

There was no evidence in the documentation that indicated the child count data is maintained representing only students with current, accepted IEP's.

CRITERION NUMBER	
	Legal Standard
SE 58	<p>Federal Special Education Entitlement Grant</p> <ol style="list-style-type: none"> 1. 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. 2. 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. 3. Appropriate local administrators monitor the entitlement grant in an ongoing manner to ensure its full implementation as the Department of Education has approved it. 4. The district has secured the approval of the Department of Education for all amendments prior to their implementation. 5. The district spends at least a proportionate share of its federal special education funds on services for children enrolled in private schools at private expense. <p>State Regulations <i>28.03(1)(e)</i></p> <p style="text-align: right;">Federal Requirements <i>300.230; 300.340-300.500</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	TITLE 1 IX. RECORD KEEPING
	Legal Standard
TI 27	<p>For each split-funded staff member, the district maintains an appropriate log (time and efforts record) verifying the time actually spent on Title I activities.</p> <p><i>200.63 (Federal Register) CFR</i></p>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 28	<p>Documentation is on file at the local Title I office verifying comparability and the district is in compliance with such comparability.</p> <p><i>1120 (A)(c)(3)(B) ESEA, IASA</i></p>
	Rating: Not Applicable District Response Required: No

CRITERION NUMBER	
	Legal Standard
TI 29	<p>The district has submitted all required reports to the Department of Education including the Local Title I Plan/Application and Performance and Achievement Report.</p> <p>The district maintains appropriate Title I records in a central location or at each Title I school and keeps correspondence on file, including documentation for identifying schools eligible for Title I services (Target Area Selection), and the form for determining school allocations.</p> <p>Information is made available to the Department regarding the allocation of Title I funds to schools and the rank order list and student selection criteria determined by the district.</p> <p><i>ESEA 1116 (d)(1)(A), 1111(b)(2)(A)(ii), 1120A(c)(2)</i></p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	
	Legal Standard
TI 29A	<p>Federal Title I Grant: The district's Title I grant is designed by appropriate local administrators who are responsible for the implementation of the local Title I programs and services.</p> <p>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>Appropriate local administrators monitor the grant in an ongoing manner to ensure its full implementation as the Department of Education has approved it.</p> <p>The district secures the approval of the Department of Education for all amendments prior to their implementation.</p>
	<p>Rating: Implemented District Response Required: No</p>

CRITERION NUMBER	PERKINS VOCATIONAL IX. RECORD KEEPING
	Legal Standard
P 22	Student records contain the items listed in the Perkins Student Record Review Checklist. (<i>Section 122</i>)
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Student record review revealed a pattern of deficiency with the documentation of incoming student assessments in native languages for LEP students and with the documentation of career and technical assessments

CRITERION NUMBER	TRANSITIONAL BILINGUAL EDUCATION IX. RECORD KEEPING
	Legal Standard
TBE 21	Cumulative records on bilingual students are maintained in a confidential fashion as required by the Student Record Regulations and provided to parents upon request. Such records include: a) results of tests and evaluations, and b) information about student's previous school experiences. <i>G.L. c.71, 34 D and E, 603 CMR 23.00</i>
	Rating: Commendable District Response Required: No

Department of Education Findings:

Keefe does commendable work in this regard. Records are very well organized and thorough. The cumulative student record includes the results of tests and evaluations and information about students' previous school experiences. Seventh and eight grade transcripts are required for admission to Keefe, although many students provide a full record of previous school documents. Student records are kept in the Bilingual Counselor's office where parents and staff can review them upon request. During the program review all such records and documents were also presented in an organized and understandable fashion, thereby making the review of the material very effective.

APPENDIX I:
NUTRITION PROGRAMS AND SERVICES

Code of Federal Regulations:

7 CFR Parts: 210 National School Lunch Program

215 Special Milk Program for Children

220 School Breakfast Program

227 Nutrition Education and Training Program

245 Determining Eligibility for Free and Reduced Price Meals and Free Milk in Schools

The criteria in this component of the Coordinated Program Review examine whether the School Food Authority ensures that the requirements for participation in the National School Lunch, School Breakfast, Special Milk and Commodity School Programs are being implemented. These requirements specify program responsibilities of local officials in the areas of program administration, preparation and service of nutritious meals, use of program funds, program monitoring, reporting and record keeping. The findings included in this section of the report have been made through on-site activities completed by the Department's Nutrition Programs and Services team member.

CRITERION NUMBER	NUTRITION PROGRAMS AND SERVICES
	Legal Standard
NS 1	All free and reduced price and paid lunches claimed for reimbursement are served to students eligible for free, reduced price and paid lunches respectively; and are counted, recorded, consolidated and reported through a system which consistently yields correct claims. <i>7 CFR 210.18 (g) (1).</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

Application errors were noted. Five applications were approved incorrectly. See S-5 of the School Data booklet that was sent directly by Nutrition Programs and Services.

CRITERION NUMBER	
	Legal Standard
NS 2	Records indicate that lunches claimed for reimbursement within the school food authority contain food items/components as required by program regulations. <i>7 CFR 210.18 (g) (2)</i>
	Rating: Partially Implemented District Response Required: Yes

Department of Education Findings:

The School Food Authority is in violation of Performance Standard #2. Meal pattern errors were noted of the menu for January 16, 2002.

CRITERION NUMBER	
	Legal Standard
NS 3	School Food Authorities account for all revenues and expenditures of their nonprofit school food service. In order to participate in the NSLP, the School Food Authority maintains records to demonstrate compliance with program requirements. Retention of these documents is for three years after the close of the fiscal year to which they pertain except in cases where audit findings are unresolved. <i>7CFR210.9 (a) (17); 210.14, 210.15</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
NS 4	The School Food Authority works to strengthen the following school nutrition program participation and management practices: a. school nutrition participation b. nutrition education activities c. productivity evaluation <i>7CFR 210.19; 7CFR 220.8; 7CFR 210.9</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
NS 5	All eligible students have access to the school food services program. <i>7 CFR 15b; 7 CFR 210.23(c).</i>
	Rating: Implemented District Response Required: No

CRITERION NUMBER	
	Legal Standard
NS 6	The School Food Authority ensures that established sanitation and health standards are implemented. Facilities are properly safeguarded against theft, spoilage and other loss. <i>7 CFR 210.13</i>
	Rating: Implemented District Response Required: No

**APPENDIX II:
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. This district-wide information, together with more detailed school building data, is periodically updated by the school district and is available in an evercurrent form on the Department's internet web site at <<http://profiles.doe.mass.edu/>>.

School and District Profiles

Definitions of Terms

Profiles

The Massachusetts Department of Education collects information about schools and districts. Some of the information collected is published in School and District Profiles on DOE web pages. The information provides a snapshot of the educational picture in communities across the state.

Now districts view, add, update and delete their own district and school information over the web to make sure that the information is as up-to-date and accurate as possible. In addition, the general public will be able to view Directory information about each school district in the state. Individuals can retrieve for themselves information such as school personnel, school programs (e.g. School Choice and TBE) and the location of specialized services such as Special Education Collaboratives, and Vocational Training Programs.

The list below provides an explanation of information presented in the Profiles.

Directory Information

DOE Code: The DOE Code, also referred to as the Organization Code, is an eight digit numeric code assigned by the Massachusetts Department of Education to every organization listed in the Directory Profiles, including every district and school in the Commonwealth. For districts and schools, the first four digits represent the District Code and the last four digits represent the School Code. Thus the organization code "02660505" stands for "0266" (Sharon Public Schools) + "0505" (Sharon High). If a form requires the 8-digit DOE school code it is calling for the entire organization code.

Prior to the 2001 school year, organization codes contained six digits (three for the district and three for the school.) With the exception of some special needs schools, the eight digit codes are the same as the six digit codes with one zero added before the district code and another zero added before the school code. Thus, Sharon High's old six digit organizational code was 266505.

Please Note: The Department's Organization Code is not the same as the Institution codes assigned by the College board for SAT and AP results. Nor is it the same as the NCES code assigned to Massachusetts schools by the U.S. Department of Education.

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 "PK" indicates the district has pre-kindergarten. A high school range ending in "13" or "14" indicates the district has a post-graduate program. Kindergarten starting age indicates the age as of a particular date at which children are eligible to begin kindergarten.

Services: Services include:

- **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.
 - **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 class work 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.

Relationships: Relationships include:

- Member of Regional Districts*: 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.

* District level data only.

Enrollment

Enrollment by Grade: indicates the enrollment for grades Pre-kindergarten (PK), kindergarten through 12, post-graduate grades 13 and 14, and ungraded (u/g) students for the listed school year.

Race/Ethnicity: indicates the percent of enrollment by race/ethnicity for the listed 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 listed school year.

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

* District level data only.

Test Results

Massachusetts Comprehensive Assessment System (MCAS): Click the MCAS link to see MCAS results for the district or school.

For additional information about Massachusetts Comprehensive Assessment System (MCAS), please refer to the Department of Education's MCAS web site at www.doe.mass.edu/mcas.

SAT: The district or school's SAT results are displayed for the listed years.

People

A list of people who work in the organization. Each name is linked to contact information for the person.

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 listed school years.

Teacher Salary*: indicates the minimum and maximum teacher salaries available, for the listed 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 listed 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.

Click one of the links in the Finance section for more school finance information.

* District level data only.

Other Data

Dropout/Attendance Rates: indicates the percentage of students in grades 9-12 who dropped out of school between July 1 and June 30 prior to the listed year and who did not return to school by October 1.

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 listed school year.

Student Exclusions: indicates the number of student exclusions that occurred during the listed 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 for the listed school year.

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

The electronic version of this profile information is available at:

<http://profiles.doe.mass.edu/home.asp?mode=ot&view=&ot=5>

SE, MOA, TI, P, TBE, N

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2002.doc

Last Revised on: July 24, 2002

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