

DATE

Kathleen Donovan, Superintendent  
Arlington Public Schools  
869 Massachusetts Avenue  
Arlington, MA.

Re: Onsite Follow-up Monitoring Report:  
Coordinated Program Review Corrective Action Plan  
and Special Education Mid-cycle Review

Verification

Dear Superintendent Donovan:

Enclosed is the Department's Coordinated Program Review Follow-up Monitoring Report together with findings regarding your district's Special Education Mid-cycle Review. This report contains the Department's findings based on the onsite activities conducted in your school district to verify the implementation status and effectiveness of corrective steps taken in response to your Coordinated Program Review Report issued on December 22, 1998.

While the Department of Education found certain noncompliance issues to be resolved, others were partially corrected, not addressed at all and/or new issues were identified by the Department's onsite team. In areas where the district has failed to implement fully its approved Corrective Action Plan, the Department views these findings to be serious. As the Department previously informed you, in cases where a district fails to fully and effectively implement a Corrective Action Plan, which was proposed by your district and approved by the Department, the Department must then prepare a Corrective Action Plan for the district, which must be implemented without further delay. You will find these requirements for corrective action included in the attached report together with any steps that must be taken by the district to fully implement new special education requirements. Please provide the Department with your written assurance that the Department's requirements for corrective action will be implemented by your school district within the timelines specified. Your statement of assurance must be submitted to the Department's Onsite Chairperson by **DATE WITHIN 10 BUSINESS DAYS OF THIS LETTER**. Failure to implement the Department's Corrective Action Plan within required timelines may result in the loss of funds to the district and/or other enforcement action by the Department of Education.

Your staff's cooperation throughout these Follow-up Monitoring activities is appreciated. Should you require additional clarification of information included in our report, please do not hesitate to contact the Onsite Team Chairperson at 781-338-3731.

Sincerely,

Donna Feinberg, Coordinated Program Review Follow-up Chairperson  
Program Quality Assurance Services

John D. Stager, Administrator  
Program Quality Assurance Services

c: David P. Driscoll, Commissioner of Education  
David McKenna, School Committee Chairperson  
Marilyn Bisbicos, District Program Review Follow-up Coordinator  
Encl.: Follow-up Monitoring Report

**MASSACHUSETTS DEPARTMENT OF EDUCATION  
COORDINATED PROGRAM REVIEW**

**Arlington Public Schools**

**ONSITE VERIFICATION OF CORRECTIVE ACTION PLAN IMPLEMENTATION  
AND/OR IDENTIFICATION OF ADDITIONAL FINDINGS REQUIRING CORRECTIVE ACTION**

**Action Plan Submitted on March 29, 1999  
Progress Reports Submitted on January 21, June 30, September 1, 2000  
Onsite Visit Conducted on December 17-18, 2001  
Date of this Report April 26, 2002**

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SE 2 Required Assessments	Partial  √	Documentation  Student Record Review	<u>A Procedures Handbook for Teachers and Specialists</u> , October 2001 has the current Evaluation Consent Form (N1A) documented.	Partial  √	The student record review indicated that, in some cases, outdated consent forms were still in use. .	Please conduct a random review of student records from January-May 2002 and submit four sample copies from each level (preschool, elementary, middle and high school) of the Evaluation Consent Form(N1 A) signed by the parent by <b>August 30, 2002.</b>
SE 3 Specific Learning Disability	Partial	Documentation  Student Record Review	<u>A Procedures Handbook for Teachers and Specialists</u> , October 2001 has the guidelines for the determination of a specific learning disability and a Specific Learning Disability Evaluation Form to summarize the	Partial	The student record review showed inconsistent documentation of the team's written determination of a specific learning disability	Please conduct a review of student records from the elementary, middle and high school records from January-May 2002 regarding compliance with the documentation of the Team's

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	<p>√</p>		<p>Team's determinations.</p>	<p>√</p>		<p>agreement and submit the results of the review by <b>August 30, 2002.</b></p>
<p>SE 6 Transition</p>	<p>Partial</p>	<p>Student Record Review</p>	<p>Students age 14 or younger, if appropriate, are invited to and sometimes attend Team meetings. Students, 16 years and older, are invited and regularly attend their IEP meetings.</p>	<p>Partial</p>	<p>The student record review showed that there is a lack of specificity regarding transition planning for the individual student.</p>	<p>Please send a memorandum to chairpersons and key personnel regarding the development of goals and objectives and the vision statement as it relates to transition planning for students 14 years and older. Submit a plan to monitor students' IEPs regarding transition planning and the key personnel responsible for the implementation by <b>August 30, 2002.</b></p> <p>Please conduct a review of IEPs for students 14-15 years old and 16-18 years old regarding transition planning from September-December 2002 and submit the results by <b>January 6, 2003.</b></p>

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<p>SE 7 Age of Majority</p>	<p>Yes</p>	<p>Documentation Student Record Review</p>	<p><u>A Procedures Handbook for Teachers and Specialists</u> , October 2001 has documented the mandated process and procedures regarding transfer of parental rights.</p>	<p>√</p>		
<p>SE 8 Team Composition</p>	<p>Partial</p>	<p>Student Record Review</p>	<p>There is a person who has the authority to commit the resources of the district in attendance at Team meetings at the preschool, elementary and middle school levels.</p>	<p>Partial</p>	<p>At the high school level, there is not always a person who has the authority to commit the resources of the district in attendance at Team meetings. In addition, there is not always regular education teacher participation at Team meetings.</p>	<p>Please send a memorandum to key personnel at the high school level regarding the district's policy and procedures regarding the required attendance of a person who has the authority to commit the resources of the district and regular education teacher(s) at Team meetings by <b>August 30, 2002</b>. Please submit copies of seven signed attendance sheets from the high school level for Team meetings conducted from September-December 2002 by <b>January 6, 2003</b>.</p>

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<p>SE 9 Eligibility Determination</p>	<p>Partial</p>	<p>Documentation  Student Record Review</p>	<p><u>A Procedures Handbook for Teachers and Specialists</u> , October 2001 documents the regulatory timelines. There is also documentation of the current N 1 form and a Team Findings Summary Form to which a service delivery grid is attached at the completion of an IEP meeting. There was evidence of adherence to the 45-day timeline regarding the completion of evaluations for initials and re-evaluations and the conducting of IEP meetings.</p>	<p>Partial</p>	<p>The proposed IEP and the determination of placement were not always provided to the parent within the mandated timelines. At the middle school level, there was inconsistent documentation of the district's proposal to act form with accompanying narrative (N 1) and the written Team meeting summary.</p>	<p>Please submit a system-wide plan to track the provision of the proposed IEP and the written notice(N1) to the parent within the current mandated timeframe and the key personnel responsible for the monitoring by <b>August 30, 2002</b>. Submit the results of a review from September-December regarding system-wide compliance with the above regulation by <b>January 6, 2003</b>.</p>
<p>SE 11 Independent Educational Evaluation</p>	<p>Yes</p>	<p>Documentation  Student Record Review</p>	<p>The district's policy and procedures are consistent with the current regulation 603 CMR 28.04(5).</p>			

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<p>SE 13 Progress Reports</p>	<p>Partial</p>	<p>Documentation  Student Record Review</p>	<p>The district is using the DOE Progress Report Form(PR) which is documented in the special education handbook <u>A Procedures Handbook for Teachers and Specialists</u> , October 2001. Progress reports are sent to the parent according to the report card cycle.</p>	<p>Partial</p>	<p>There was inconsistent documentation of progress reports in student records. Progress reports did not always specifically address the goals and objectives in a student's IEP.</p>	<p>Review with key personnel the required elements to be addressed when reporting a student's progress. Submit a sample of progress reports, three from each level-preschool, elementary, middle and high school from January-June 2002 by <b>August 30, 2002.</b></p>
<p>SE 14 Annual Review</p>	<p>Yes</p>	<p>Documentation  Student Record Review</p>	<p>The district conducts annual review meetings in accordance with 603 CMR 28.04(3).</p>			
<p>SE 16 Screening</p>	<p>Yes</p>	<p>Documentation  Interviews</p>	<p>The district conducts preschool and kindergarten screenings. Interpreters and translated documents are available for parents and children whose primary language is other than English.</p>			

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<p>SE 18 IEP Development</p>	<p>Partial</p>	<p>Documentation  Student Record Review Interviews</p>	<p>The district has developed a special education handbook for key personnel <u>A Procedures Handbook for Teachers and Specialists</u>, October 2001 that provides policies, procedures and forms to guide personnel through the IEP process. The district has implemented the current mandated IEP process and procedures system-wide regarding the development of the IEP and the determination of placement.</p>	<p>Partial</p>	<p>As referenced in SE 9, the proposed IEP and the determination of placement were not always provided to the parent within the mandated timelines. In addition, the placement form was inconsistently documented in the student records and was not always accurately completed. At the middle school level, there was inconsistent documentation of the district's proposal to act form with accompanying narrative (N 1) and the written Team meeting summary.</p>	<p>Refer to the corrective action in SE 9. In addition, include the tracking of the provision of the determination of placement form(PL-1) into the system-wide plan. Submit samples of completed determination of placement forms provided to parents, three from each level- preschool, elementary, middle and high school from January-June 2002. Submit documentation by <b>August 30, 2002.</b></p>
<p>SE 20 Least Restrictive Environment</p>	<p>Yes</p>	<p>Documentation Interviews Student Record Review</p>	<p>The district considers the least restrictive environment for students through Team discussion at IEP meetings.</p>			

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SE 21 Extended School Day/Year	Yes √	Documentation Student Record Review	The district appropriately considers extended school/year for a student through Team discussions at IEP meetings.	√		
SE 22 IEP Implementation	Yes	Student Record Review Interviews	The district implements the student's IEP services without delay upon receipt of signed parental consent.			
SE 24 Notice	Partial	Student Record Review Documentation	A Procedures Handbook for Teachers and Specialists, October 2001 has the N1 and N2 forms and guidelines for their use.	Partial	The student record review indicated that, in some cases, outdated notices forms regarding the district's proposal to act were still in use.	Please conduct a random review of student records from January-May 2002 and submit four sample copies from each level (preschool, elementary, middle and high school) of the N1/N2 forms sent to the parent by <b>August 30, 2002.</b>
SE 25 Parent Consent		Student Record Review Documentation	The district demonstrates compliance with federal and state regulations in obtaining written parental consent prior to providing services or making a placement.			

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<p>SE 26 Parent Participation</p>	<p>√</p>	<p>Student Record Review  Documentation</p>	<p>The district has high parent participation at IEP meetings and makes multiple attempts to reschedule, when necessary.</p>	<p>√</p>		
<p>SE 27 Team Meeting Notice</p>		<p>Student Record Review  Documentation</p>	<p>A Procedures Handbook for Teachers and Specialists, October 2001 has the Team meeting notice form with the required elements.</p>	<p>Partial</p>	<p>The student record review indicated that, in some cases, outdated Team meeting notice forms were still in use and did not contain all the required elements, including date of notice.</p>	<p>Please conduct a random review of student records from January-May 2002 and submit four sample copies from each level (preschool, elementary, middle and high school) of Team meeting notices sent to the parent by <b>August 30, 2002</b>.</p>
<p>SE 28 Provision of The IEP</p>	<p>Partial</p>	<p>Student Record Review  Documentation</p>	<p>Refer to SE 9 regarding the implementation of this criterion.</p>	<p>Partial</p>	<p>Refer to previous finding in SE 9.</p>	<p>Refer to corrective action ordered in SE 9.</p>

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SE 29 Communications	Yes	Documentation  Student Record Review	The district submitted policy and procedures for the provision of translated documents and interpreters for evaluations and the IEP process. In addition, samples of mandated forms that have been translated into the major languages other than English for parents were submitted. There was verification of the district's provision of interpreters and translated documents to parents in the student records.			
SE 30 Parents Rights Brochure	Yes	Documentation	The district provided a copy of current Parents Rights Brochure and a list of the languages other than English that the district has provided translations for parents.			
SE 32 Parent Advisory Council	Yes	Documentation	The district provided the Parent Advisory Council's current membership list and a newsletter sent to parents regarding PAC meetings and workshops.			
SE 33 General Curriculum	Yes	Student Record Review  Documentation	The district provides full access to students with disabilities to the general curriculum and the student's participation is documented in the individual student's IEP.			

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SE 34 Continuum of Services	Yes	Student Record Review  Documentation Interviews	The district provided a written description of continuum of services available to students with disabilities system-wide			
SE 35 Assistive Technology	Yes	Documentation  Student Record Review	The district provided lists of assistive devices/materials/equipment purchased for students at all levels, in-district and out-of-district. The student records verified the Team's consideration of the use of assistive technology for individual students.			
SE 37 Approved/ Unapproved Placements	Yes	Documentation  Student Record Review	The district implements the required procedures consistent with the state regulations.			
SE 39 Private School at Private Expense	Yes	Documentation  Student Record Review	The district provided policy and procedures for the provision of special education services to eligible students attending private school consistent with the current state regulation. In addition, a letter sent to directors of private schools with a needs assessment to determine effective ways to support students on IEPs within the individual private schools.			

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SE 49 Counseling Services	Yes	Documentation Student Record Review Interviews	The district provides counseling and occupational therapy services to the individual student if determined necessary by the Team through the IEP process.			
SE 49A Transportation	Yes	Documentation Student Record Review	The district considers and provides specialized transportation to the individual student if determined necessary by the Team through the IEP process.			
SE 50 Curriculum Accommodation Plan	Implementation In progress	Documentation Interviews	The principals are in the process of developing curriculum accommodation plans for their school buildings. There are instructional intervention support procedures in place at all levels. Documentation included a list of support services available in regular education for all students from preschool to high school. Submit copies of the building based curriculum accommodation plans by <b>January 6, 2003</b> .			
MOA 4 Identification of Students with limited English Proficiency	Yes	Documentation Interviews	The district identifies students with limited English proficiency upon enrollment. The district uses standardized assessment instruments, the preLAS and the LAS to determine a student's proficiency and amount of instructional services needed. In addition, the district has developed an ESL intake form to assist in the determination of need for ESL instruction.			

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<p>MOA 5 Program Modifications for Students with limited English Proficiency</p>	<p>Yes</p>	<p>Documentation Interviews</p>	<p>The district provided documentation regarding the ESL services and program modifications provided to individual students of limited English proficiency at the building based level. In addition, the methods of coordination and collaboration among the ESL and regular education personnel to monitor the provision of services and program modifications was addressed.</p>	<p>√</p>		
<p>MOA 7 Information in languages other than English</p>	<p>Yes</p>	<p>Documentation</p>	<p>The district provided samples of information translated into the major languages of the district, Spanish, Chinese, Korean, Arabic, Greek, Japanese and Portuguese. The district also places in its publications, a statement translated into the major languages indicating whom to contact regarding a request for translation of a school document. In addition, a list of translators, interpreters and agencies used, was submitted.</p>			
<p>MOA 10 Notification</p>	<p>Partial</p>	<p>Documentation</p>	<p>All the district's handbooks contain the full nondiscrimination clause. The student handbooks from the Dallin, Brackett and Stratton elementary schools identify the names and contact information for the district's Title VI, Title IX and 504 Coordinators.</p>	<p>Partial</p>	<p>The Arlington High School, Ottoson Middle School, Bishop and Hardy elementary school handbooks do not identify the names and contact information for the district's Title VI, Title IX and 504 Coordinators regarding policy notification.</p>	<p>Please revise and update the policy notification as an addendum to be inserted into the Arlington High School, Ottoson Middle School, Bishop and Hardy elementary school handbooks for the 2002-03 school year by <b>August 30, 2002.</b></p>

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MOA 11  Non-discrimination Clause	Yes	Documentation	The district's publications and handbooks contain the full non-discrimination notice.			
MOA 17A  Use of Physical Restraint	Implementation in Progress	Documentation	Key personnel have been trained and are in the process of conducting restraint trainings in-district to principals and 2-3 staff in each school building. A set of policies and procedures and written guidelines are in the approval process and an orientation for all new staff is being instituted. Submit a copy of the district's policy and procedures and written guidelines by <b>August 30, 2002</b> .			