



**BROCKTON PUBLIC SCHOOLS  
and  
CHAMPION CHARTER SCHOOL**

**COORDINATED PROGRAM REVIEW  
REPORT OF FINDINGS**

**Dates of Onsite Visit: November 3-7  
Date of Draft Report: February 10, 2004  
Due Date for Comments: February 27, 2004  
Date of Final Report: March 11, 2004 and amended April 5, 2004  
Action Plan Due: April 29, 2004**

**Department of Education Onsite Team Members:**

**Deirdre Keogh-Anderson, Chairperson**

**Barry Barnett**

**Dr. Joan Brinckerhoff**

**John Desses**

**Robyn Dowling**

**Gary Gomes**

**Nancy Hicks**

**Patricia Knipstein**

**Joanne Laubach**

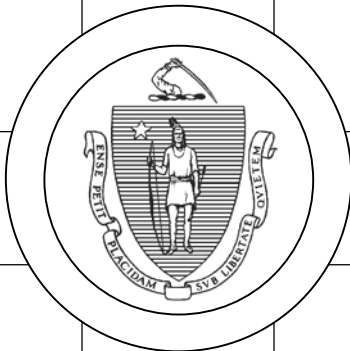
**Janice McManus**

**Judy Miller**

**Deborah Smith-Pressley**

**Kathryn Riley**

**Juan Tapia**



---

**David P. Driscoll, Commissioner of Education**

---

**MASSACHUSETTS DEPARTMENT OF EDUCATION  
COORDINATED PROGRAM REVIEW**

**Brockton School District**

**Table of Contents**

<b>OVERVIEW OF REVIEW PROCEDURES.....</b>	<b>3</b>
<b>REPORT INTRODUCTION.....</b>	<b>6</b>
<b>EXECUTIVE SUMMARY.....</b>	<b>8</b>
<b>DEFINITION OF TERMS.....</b>	<b>18</b>
<b>COMPONENT I: ASSESSMENT OF STUDENTS.....</b>	<b>19</b>
SPECIAL EDUCATION.....	20
CAREER AND TECHNICAL EDUCATION .....	34
ENGLISH LEARNER EDUCATION.....	37
<b>COMPONENT II: STUDENT IDENTIFICATION AND PLACEMENT .....</b>	<b>38</b>
SPECIAL EDUCATION.....	39
CIVIL RIGHTS METHODS OF ADMINISTRATION .....	48
TITLE 1 .....	53
CAREER AND TECHNICAL EDUCATION .....	54
ENGLISH LEARNER EDUCATION.....	56
<b>COMPONENT III: PARENTAL INVOLVEMENT.....</b>	<b>59</b>
SPECIAL EDUCATION.....	60
CIVIL RIGHTS METHODS OF ADMINISTRATION .....	67
TITLE 1 .....	67
SAFE AND DRUG FREE SCHOOLS.....	71
CAREER AND TECHNICAL EDUCATION .....	73
ENGLISH LEARNER EDUCATION.....	74
<b>COMPONENT IV: CURRICULUM AND INSTRUCTION .....</b>	<b>75</b>
SPECIAL EDUCATION.....	76
CIVIL RIGHTS METHODS OF ADMINISTRATION .....	86
TITLE 1 .....	88
SAFE AND DRUG FREE SCHOOLS.....	91
CAREER AND TECHNICAL EDUCATION .....	91
ENGLISH LEARNER EDUCATION.....	95
<b>COMPONENT V: STUDENT SUPPORT SERVICES .....</b>	<b>98</b>
SPECIAL EDUCATION.....	99
CIVIL RIGHTS METHODS OF ADMINISTRATION.....	106
TITLE 1.....	113
CAREER AND TECHNICAL EDUCATION .....	113
ENGLISH LEARNER EDUCATION.....	114

<b>COMPONENT VI: FACULTY, STAFF AND ADMINISTRATION.....</b>	<b>117</b>
SPECIAL EDUCATION.....	118
CIVIL RIGHTS METHODS OF ADMINISTRATION .....	122
TITLE 1 .....	124
CAREER AND TECHNICAL EDUCATION .....	126
ENGLISH LEARNER EDUCATION.....	127
<b>COMPONENT VII: SCHOOL FACILITIES .....</b>	<b>129</b>
SPECIAL EDUCATION.....	130
CIVIL RIGHTS METHODS OF ADMINISTRATION .....	131
CAREER AND TECHNICAL EDUCATION .....	132
ENGLISH LEARNER EDUCATION.....	132
<b>COMPONENT VIII: PROGRAM PLAN AND EVALUATION.....</b>	<b>134</b>
SPECIAL EDUCATION.....	135
CIVIL RIGHTS METHODS OF ADMINISTRATION .....	136
TITLE 1 .....	137
SAFE AND DRUG FREE SCHOOLS.....	141
CAREER AND TECHNICAL EDUCATION .....	143
ENGLISH LEARNER EDUCATION.....	144
<b>COMPONENT IX: RECORD KEEPING .....</b>	<b>146</b>
SPECIAL EDUCATION.....	147
TITLE 1 .....	148
SAFE AND DRUG FREE SCHOOLS.....	161
CAREER AND TECHNICAL EDUCATION .....	162
ENGLISH LEARNER EDUCATION.....	162
<b>APPENDIX: .....</b>	<b>164</b>
SCHOOL DISTRICT PROFILE INFORMATION.....	165

## MASSACHUSETTS DEPARTMENT OF EDUCATION

### COORDINATED PROGRAM REVIEW REPORT

#### Brockton Public School District and Champion Charter School

#### OVERVIEW OF REVIEW PROCEDURES

As one part of its Accountability System, the Department of Education oversees local compliance with education requirements through the Coordinated Program Review System (CPR). All reviews include the following selected requirements:

- special education under the federal Individuals with Disabilities Education Act (IDEA-97), and M.G.L. Chapter 71B (Chapter 766 of the Acts of 1972);
- federal civil rights requirements under Title VI of the Civil Rights Act of 1964, the Equal Educational Opportunities Act of 1974, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, together with related state requirements under M.G.L. Chapter 76, Section 5 (Chapter 622 of the Acts of 1971) and other Massachusetts General Laws;
- targeted standards from the Board of Education's Physical Restraint regulations (603 CMR 46.00);
- targeted standards from the federal McKinney-Vento Homeless Education Assistance Improvements Act of 2001 (included in the No Child Left Behind Act of 2001); and
- provisions of M.G.L. c. 71A, the state law that governs the provision of education to limited English proficient students. (Note that due to the voters' approval in 2002 of an initiative petition entitled "Question 2," M.G.L. c. 71A has been significantly amended. Under the amended Chapter 71A, limited English proficient students, now referred to as "English learners," must be provided instruction in sheltered English immersion or 2-way bilingual programs unless they have received a waiver. As a result of this change in the law, the Department's Coordinated Program Review standards under Chapter 71A are significantly revised for the 2003-2004 school year. All districts reviewed by the Department during the 2003-2004 Coordinated Program Review cycle and that enroll limited English proficient students have been implementing self-assessment activities using these updated standards. Six school districts throughout the state are participating in pilot monitoring activities to validate their self-assessment results as part of their scheduled Coordinated Program Review.)

Additional program areas reviewed during the Coordinated Program Review visits in selected districts may also include:

- Title I of the Elementary and Secondary Education Act of 1965, including related "No Child Left Behind" requirements in Title IIA;
- Safe and Drug-Free Schools and Communities Act;
- Career and Technical Education requirements under the federal Perkins Vocational and Technical Education Act and state M.G.L. c. 74; and
- Nutrition Programs and Services

The selected school districts for 2003-2004 were notified by the Commissioner of Education in June 2003 of scheduled visits and of requirements to implement self-assessment activities prior to the arrival of the Department's visiting team.

The Department's 2003-2004 schedule of Coordinated Program Reviews is posted on the Department's web-site at <<http://www.doe.mass.edu/pqa/review/cpr/schedule.html>>. The state-wide six-year Program

Review cycle together with the Department's Mid-cycle Special Education follow-up monitoring schedule are posted at <[http://www.doe.mass.edu/pqa/review/cpr/6yrcycle\\_ad.html](http://www.doe.mass.edu/pqa/review/cpr/6yrcycle_ad.html)>.

### **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 Department staff members together with any necessary outside consultants conducts a Coordinated Program Review over two to ten days in a school district or charter school.

**Scope:** Fifty-four school districts and charter schools are scheduled to receive visits in school year 2003-2004. 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 encompass the required elements for the specific program areas. In the case of special education, the elements selected for the 2003-2004 reviews contain, at a minimum, those required by the federal Office for Special Education Programs (OSEP) and revised requirements included under IDEA-97 as described in the Department's Special Education Advisories. Additionally, the 2003-2004 reviews incorporate updated state special education requirements as adopted by the Board of Education and effective on 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, and intended to promote high standards and achievement for all students.

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

- Interviews of administrative, instructional and support staff across all grade levels.
- Interviews of parent advisory council (PAC) representatives and other interviews as requested by persons from the general public.
- Student record reviews in the program areas of special education, English learner education (c. 71A), Career and Technical Education programs, and Section 504 (student accommodation plans). A representative sample of student records is selected by the Department. Student records are examined by the Onsite Team using standard Department student record review procedures to make determinations regarding the implementation of procedural and programmatic requirements. Parents of students with disabilities whose files are selected for the record review are sent a survey that solicits information regarding their experiences with the district's implementation of special education programs, related services and procedural requirements.
- Classroom and facilities observation. 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 requirements.
- Collaborative Programs and Services. Where the district is a member of a collaborative approved by the Department of Education and is a site for programs or services operated

by the collaborative, a sample of interviews, student record reviews and classroom and facility observations are conducted.

An Executive Summary and detailed findings for each program area describe determinations of the Department about the implementation status of each requirement (criterion) reviewed.

Response: The findings included in the Final Report note those criteria the implementation of which the Team found to be commendable or substantially implemented. Where compliance criteria are found to be not fully implemented, the local district, charter school, or educational collaborative must propose corrective actions to bring those areas into compliance with the respective statutes or regulations.

All recently issued Department of Education Coordinated Program Review Reports are posted on the agency's website at <http://www.doe.mass.edu/pqa/review/cpr/reports/> .

The Department believes that the Coordinated Program Review process is a positive experience and that the Final Report is a helpful planning document for the continued development and improvement of programs and services in each school district, charter school and educational collaborative.

## REPORT INTRODUCTION

A 14-member Massachusetts Department of Education team visited Brockton Public School District and Champion Charter School during the week of November 3, 2003 to evaluate the implementation of selected criteria in the program areas of Special Education, Civil Rights, Title 1, Career and Technical Education, and Safe and Drug Free Schools. 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 Brockton Public School District and Champion Charter School. These areas are as follows:

*Administration and staff are to be commended for their commitment and dedication to high student achievement.*

*The Champion Charter School staff is to be commended for their clear commitment to students. The charter school provides an atmosphere of challenge, support and respect for diversity for both students and staff.*

*The early childhood programs show a strong commitment to high quality curriculum and classroom environments. Through the use of a video developed by the Brockton Public Schools the district has helped improve transition from Early Intervention programs to PreK.*

*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.*

*Brockton Public School District is committed to the practice of providing education in the least restrictive environment. Commendable staffing in the classroom and ongoing teacher training to best learn how to educate children with diverse learning needs supports this commitment. Emphasizing Brockton's commitment to least restrictive environment are the inclusion classes.*

*Brockton Public School District makes a tremendous effort in working with students whose behavior impedes their learning. The district works closely with a behavior psychologist in addressing the needs of students in both the Phoenix and Ithaca programs. The staff is trained to collect data, interpret the data and use that information to appropriately help students be more successful in their learning.*

*The district has an outstanding assistive technology program with emphasis on assessing children and their needs in this area and providing them with a diverse range of educational technology. The assistive technology department emphasizes training teachers and staff on these materials.*

*The district is committed to the practice of helping parents of students in the community with limited English language skills understand general announcements by sending out a liaison into the home. In addition, the district has an impressive array of placement notification letters, report cards, notices of school events, progress reports, home language surveys, and special education documents translated into all of the native languages represented in the district.*

*Parents, teachers, principals and program administrators were interviewed and all have expressed their appreciation for the opportunities provided to parents to be actively involved in the educational process of the children.*

*Parents participate in workshops and meetings offered at the schools, and all requirements on parental involvement are met according to the guidelines of NCLB.*

*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 58 administrative staff.
- Interviews of 203 teaching and support services staff across all levels.
- Interviews of six parent advisory council (PAC) representatives, four Title 1 Parent Advisory Council members, and seven Safe and Drug Free Health Advisory Council parent representatives and 57 students.
- Seven interviews as requested by persons from the general public.
- Student record reviews: A sample of 102 student records was 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: 60 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. 14 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 61 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 plans.



# COORDINATED PROGRAM REVIEW REPORT

## EXECUTIVE SUMMARY

### **Brockton Public School District and Champion Charter School**

The following summary synthesizes the findings for criteria included in the Coordinated Program Review as they respond to essential questions that 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 Students**

*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?*

The district has a procedure in place to ensure that students with disabilities receive evaluations, that they are re-evaluated every three years and that Individual Education Plans (IEPs) are reviewed annually. Students with IEPs participate in general State and district-wide assessment programs and IEP Teams designate how each of these students will participate. The district has implemented an assessment system that ensures that students are evaluated in all of their areas of suspected disability. The district does consistently complete all required assessments consented to by the parent. Special requirements for the determination of specific learning disabilities have been implemented. IEP teams do an outstanding job considering completed functional behavior assessments when developing an IEP for a student with behavior issues. The district consistently implements the requirements for independent evaluations.

For some students age 14 and above, the IEP vision statements often do not reflect student preferences and interests and are often not individualized. Additionally, IEPs being written for students being placed out-of-district need to have goals and objectives written that are aligned either with previously written IEPs for that student and /or academic goals that are more aligned with the student's disability.

Although progress reports went out in a timely manner they did not always clearly state whether a student had made progress on the yearly annual goal.

Career and Technical Education (CTE) students are evaluated using the SAGE and IOWA tests, and assessment results are recorded in student folders. Although largely in compliance with DOE Career and Technical Education Coordinated Program Review standards, there were a couple of students whose records were reviewed who missed assessment because of absenteeism. The CTE program needs to determine an alternate method for assessing students who are absent on scheduled testing dates.

All required assessment procedures are implemented in all Title I schools for the Brockton Public Schools.

There are no Safe and Drug Free criteria in this component for Brockton Public Schools.

At the Champion Charter School not all assessments were appropriately selected to assess specific areas of educational need for the student. For a student who is 16 years or older, the Team includes in the IEP possible services that would promote movement of the student from school to post-school activities. The vision statements in the IEPs did not always contain sufficient detail regarding the student's plans beyond graduation from school. Champion Charter School had not performed required eligibility determinations. The school does not currently have in place procedures to ensure that referrals for special education are handled within the required timelines. And the school has not conducted a full three-year re-evaluation for students with disabilities in need of them. There were no progress reports found in student records.

There are no Title I criteria in this component for the Champion Charter School.

### **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 Brockton public school system maintains a continuous and effective liaison with various public and private entities to ensure the transition of children who require special education services. The district successfully facilitates the transition of young students with disabilities from Early Intervention Programs by ongoing, cooperative involvement in coordination with Early Intervention programs or agencies.

The district's most impressive accomplishment noted by the review team was the district's ability to ensure students are educated in the Least Restrictive Environment (LRE). Inclusion as a practice and as a model has been in place in the district for almost 11 years. The December 1, 2002 Massachusetts Urban Project analysis reports that 77% of students with disabilities were enrolled in programs less restrictive than a substantially separate program. Emphasizing Brockton's commitment to least restrictive environment are the inclusion classes that are well supported by staffing requirements. These classes are taught by a dual certified teacher, a regular education teacher, an aide and a master teacher assistant (MTA) who is a college graduate.

Students in more restrictive settings are placed in appropriate settings for clearly articulated reasons that are vital to the individual student's success. A commendable practice in the Brockton Public Schools is the district's dedication to servicing all children with behaviors that impede learning. Brockton's commitment to servicing all students can be seen at the Ithaca School (the district's special education day school), at the Phoenix School (an alternative program), and in many other classrooms. The consultation of a behavior psychologist and the training of teachers and paraprofessionals on how to collect data, how to interpret it, and how to make changes using that data really drives the district to be innovative and effective.

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.

Career and Technical Education student placement was thoughtful and reflected the input of both assessment and exploratory program experiences. Student and parent input are part of the

process. The sequence of courses takes student need and ability into account. Special needs aides are assigned to vocational classes when appropriate.

All Title I schools in the Brockton School District are schoolwide and identification of students for services is not required.

There are no Safe and Drug Free criteria required in this component for Brockton Public Schools.

The Champion Charter School has not implemented child find activities within its program, and does not currently have in place effective measures to identify and refer students who may be in need of special education. When parents do attend IEP team meetings they do not always leave with a written copy of agreements reached at the Team meetings, nor are copies of typed IEPs always sent out to parents within the required timelines. The school does a commendable job of providing an inclusive setting for the delivery of special education services. Students with disabilities receive specialized instruction from a certified special educator in a small group classroom alongside their regular education peers. The school does not use qualified staff or appropriate procedures and assessments to annually classify and evaluate students who are limited English proficient and who need special language assistance.

The criteria in this component are not applicable to Title I Schoolwide Programs for the Champion Charter School.

### **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 responds to parental requests for special education evaluations in a timely manner and sends out the required notices, translated into the appropriate language as needed, within the timelines mandated by special education regulation. If a parent has a concern regarding the purpose of the evaluation or the process of the identification of a student's eligibility for special education services, the administrator of special education provides parents with opportunities to discuss parental concerns. The district obtains parental consent in all circumstances required by state and federal law. Additionally, the district's Team invitation and parents' rights notice include all of the required elements.

The district has established a Special Education Parent Advisory Council with by-laws and procedures to implement its advisory role within the district.

In shaping programs at the Brockton Public Schools, the district has focused on improving interagency collaboration and communication. At the high school level in order to help students with disabilities transition into adult life, the Head of the Special Education Department meets monthly with members of the Department of Mental Retardation, Massachusetts Rehabilitation Commission, the University of Massachusetts at Boston and Brockton Public Schools guidance staff to develop strategies to transition students to adult agencies.

The district does publish general announcements, counseling materials and notices of extracurricular activities in many other languages other than English.

There is evidence of parental involvement and notification in student files, in advisory group minutes, and in program records. Several bilingual staff are assigned to work with Limited English Proficient (LEP) parents. Brockton should, however, make more materials available in Creole/Portuguese (for the Cape Verdean and Portuguese students and parents). Although parents are encouraged to attend exploratory and career nights, attendance is often disappointing. Brockton should re-examine its announcements of these events to ensure greater parent participation. Current publicity is extensive but is failing to draw in representative numbers from certain cultural populations.

The parent involvement activities funded by Title I satisfy all the requirements. Interviews with parents and staff indicate that parents are actively involved in the educational process of their children. A rating of commendable is awarded to the Brockton school district for the efforts of all the staff to inform and engage parents.

The Safe and Drug Free Schools program in the Brockton school district promotes, involves, trains and maintains a strong parent component from the early learning center to the high schools. Parent programs were offered every month in almost every school and/or district wide. These trainings along with parents' programming are open to all BPS parents, private school parents as well as any parent in the community.

Required notice letters are not always sent to the parent or the student over 18 years in a timely manner from Champion Charter School. When the school was unable to obtain parental consent for a re-evaluation or placement, the school does not proceed to the Bureau of Special Education Appeals as required. Communications with the parents from the charter school are in both English and the primary language of the home.

The Title I requirements under this component are partially implemented for the Champion Charter School because parents are not offered opportunities to be involved in the planning and implementation process of Title 1 services. The Champion Charter School has not developed a written parental involvement policy or provided parents with "right to know" information.

#### **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 its curriculum with the Massachusetts Curriculum Frameworks. The district provides or arranges for the provision of each of the elements of the students' IEPs. IEPs are implemented without delay upon parent consent and programs and services are provided without expense to the child's parent. A full continuum of services and all necessary specialized materials and assistive technology are provided for special education students. The district follows the requirements regarding the evaluation of and provision of services to students with special needs who are enrolled in private schools at private expense.

In order for the district to hold all students to high expectations, monitoring plans need to be consistently developed for all students in out-of-district placements.

Curriculum and instruction are definitely geared to individual student needs. All students in the CTE classes are quite engaged. However, only a limited number of academic teachers seem to have an understanding of contextualizing academics for vocational students. Brockton is a large comprehensive high school that does not separate technical students from academic students. Consequently, contextualized learning requires extra planning for academic teachers. Professional development efforts should be made to this end.

All Title I schoolwide schools for the Brockton school district have met the requirements.

Within the Safe and Drug Free Schools program in the Brockton school district the Director of Health and the SDFCA Coordinator meet minimally once a month with the Directors of Special Education, Title I, Bilingual Education, Guidance, Early Childhood, Senior Director of Curriculum and Senior Director of K-8 Education to address their specific needs and collaborate in the development and implementation of all programs and activities for Brockton students, staff and parents.

At the Champion Charter School personnel have an understanding of the connection between the Massachusetts Curriculum Frameworks and the expectations of the state for student performance.

At Champion Charter School services described in student's IEPs have not been implemented at the school from its inception until the current (2003-04) school year. A special education teacher and assistant are now on staff to remedy this situation.

The Title I requirements under this component are partially implemented for the Champion Charter School because the Schoolwide Plan does not contain all ten required components.

### **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?*

All extra curricular activities and clubs sponsored by the district are open to all students regardless of race, color, sex, religion, national origin, sexual orientation or disability, and equal opportunity is provided for male and female students to participate in intramural and interscholastic sports.

The district provides support to those students who need it through their commendable assistive technology department. The district's commitment to assistive technology is demonstrated as a means of further helping students both access the curriculum and access the world around them. Additionally the district provides ongoing training and support to teachers in order for them to use equipment that is becoming increasingly more sophisticated.

The district makes information available to all students regarding occupational/vocational opportunities, and counseling materials and activities are free from bias and stereotypes. Students over 16 years old who are withdrawing from school without a diploma are appropriately notified and counseled regarding other options that are available to them.

The district provides support to students who need it through their mentoring program for Brockton High School students with disabilities. This is a drop out prevention program that provides assistance with homework, academic support, MCAS tutoring and development of social skills.

Brockton Public Schools makes tremendous efforts in helping parents of students in the community with limited English language skills understand general announcements by sending out a liaison into the home. In addition, the district has an impressive array of placement notification letters, report cards, notices of school events, progress reports, home language surveys, and special education documents translated into all of the native languages represented in the district.

Student Support Services are provided to students with special needs and to LEP students on a regular basis. Special needs aides are assigned to CTE classes and assist students in all assignments. The district has made several accommodations for physically disabled students as well, and it provides language translation and LEP services. One noted weakness in the service strategy is that students in the alternative high school do not have access to the full range of career and technical programs. This is a dilemma for the school as alternative high school students are prohibited from attending the main high school during the regular school day hours.

Services funded by Title I in schoolwide schools are integrated in the regular education program and all requirements are met for the Brockton school district.

There are no Safe and Drug Free criteria required in this component for Brockton Public Schools.

The Champion Charter School has recently developed procedures for recording the suspensions of special education students and permanent implementation of this new practice will bring the school into full compliance. When students with disabilities at the school have been found in need of counseling as a related service, this has not been provided to them. The Champion Charter student handbook does not contain procedures for the discipline of students with special needs and students with Section 504 Accommodations Plan. The school does not have in place clear procedures covering the filing and resolution of complaints regarding harassment and/or discrimination. Champion Charter School has not implemented notice requirements for students 16 or over leaving school without a high school diploma.

The Title I requirements are not applicable to the Champion Charter School. Charter schools are not required to meet obligations associated with serving students in private schools.

#### **Component VI: Faculty, Staff and Administration**

*Does the district maintain licensed 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 maintains appropriately certified and/or licensed staff to carry out their respective

responsibilities in specific program areas. The district has provided the required special education related training for regular and special education teachers regarding state and federal special education requirements, district policies and procedures, confidentiality of records, analyzing and accommodating diverse learning needs and physical restraint procedures. Regular education teachers would like to see more training on teaching students with diverse learning needs.

The district conducts annual, mandatory civil rights training that provides comprehensive civil rights information to implement the requirements of state and federal law. The district has developed a Curriculum Accommodation Plan as required by recent state law, and will work on further disseminating this plan throughout the district.

Communication between the administrator of Special Education and the team chairs is ongoing and supportive. The district's administration works closely with staff members in designing professional development plans to ensure that individual building and district wide needs are addressed.

MCAS portfolio assessments and how the district has improved the quality of these is impressive. Staff were sent to the Department of Education trainings and became qualified as trainers both for the state and for the school district. This practice of identifying something that the district needs to improve on, spending money on sending someone from the district to receive training and then having that person return to the district to provide training is an effective one.

Brockton Public Schools were awarded a grant called, "Exploring the options for children with Autism" through the Department of Education, which allowed the district the opportunity to hire an Autism Specialist, who works with staff, administration, and parents to provide training opportunities and support for the district's ASD population. Brockton effectively used this grant to provide ongoing professional development to the district's staff that teach these children.

Brockton Public Schools does attempt to recruit staff from diverse groups but is not as successful as it would like to be.

CTE staff are all appropriately certified and take part in excellent professional development opportunities provided by the district. However, teachers and other school staff must co-pay for these courses, which may act as a deterrent to participation; the co-pay requirement should be reconsidered by the administration. Many of the teachers in this division hold Master's degrees. The CTE Director is consistently and effectively engaged with his staff and has a good working relationship with the central administration.

All Title 1 schoolwide schools for the Brockton school district have met the requirements for this component.

There are no Safe and Drug Free criteria required in this component for Brockton Public Schools.

The Champion Charter School employs a special education teacher with the appropriate teacher certification. Paraprofessionals are appropriately trained to assist in providing special education. School employment practices in general are free from discrimination on the basis

of race, color, national origin, sex, or disability. The Champion Charter School has not offered all required trainings to staff as required by state regulations.

The Title I requirements under this component are partially implemented for the Champion Charter School because not all staff are appropriately licensed or hold current licensure waivers for their job title or demonstrate subject matter competency in the subject areas that they teach in accordance with federal No Child Left Behind requirements.

### **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?*

The district has a number of special education instructional spaces that are not comparable to the instructional spaces used for the delivery of regular education. In addition, there are a number of schools in which special education classrooms have been clustered in one hallway or area of the school, and thereby, not maximizing the inclusion of disabled students into the life of the school and not minimizing the separation and stigmatization of such students. Additionally the early intervention program at the Howard School is called the Howard Diagnostic Program, which is felt to be an outdated name for a program and discriminatory in what it signifies.

The district is technically in compliance with Section 504 requirements that the district make available and entirely accessible to students with disabilities all educational programs and services offered at each level. It is not, however, in compliance with ADA standards.

Classrooms meet established safety standards according to the criteria used by DOE CTE staff. Safety plans are in place. Several classes would benefit from more space for students and less clutter. More storage space should be made available to the program. Computers and/or clutter obstruct some safety features. This should be corrected.

There are no Safe and Drug Free criteria required in this component for Brockton Public Schools.

All classrooms at the Champion Charter School are small. The room used for the delivery of special education service, however is overcrowded compared to the average standard present in the regular education program.

There are no Title I criteria in this component for the Champion Charter School.

### **Component VIII: Program Plan and Evaluation**

*Does the district evaluate its programs in accordance with regulatory requirements? Does it use the results of its evaluations to improve programs? Do parents have opportunities for input on program needs, program implementation, and program evaluation and improvement?*



The district conducted an evaluation of special education services and programs. The school committee reviews policies of the district on a revolving schedule. The district uses the result of program evaluation to update policies and practices as needed, further ensuring that the district is in compliance with regulatory requirements. The district has established written guidelines for the selection of new curriculum purchases and existing materials.

The district does evaluate its programs annually, and Brockton met virtually all of its Career and Technical Education performance standards in FY 2003, for which it should be commended. There is evidence (see Component III) that parents are invited to provide input into program design, implementation, evaluation and improvement.

Title I requirements in schoolwide schools are met for the Brockton Public Schools.

Within the Safe and Drug Free Schools program in the Brockton school district an evaluation process is employed to measure the district's progress towards achieving its goals and objectives. The SDFSCA Coordinator with the advisory council, teachers and other program coordinators have developed a very effective assessment to evaluate the effectiveness of the programs. There is documentation that some evaluation results are used to refine, improve and strengthen programs and their implementation.

Not all special education programs and services are regularly evaluated at the Champion Charter School. However, the school has a process to ensure that curriculum that is being used is balanced and free of stereotypes.

The Title I requirements under this component are partially implemented for the Champion Charter School because the implemented program is not evaluated for effectiveness annually.

### **Component IX: Record keeping**

*Does the District maintain required records and documentation for each program area? Are entitlement grants appropriately designed, amended, and monitored? Does the district use federal grant funds in accordance with statutory fund-use rules, including supplement not supplant provisions where applicable? Does the district meet applicable maintenance of effort requirements?*

The district maintains a special education register and submits all required reports to the Department of Education. Those administrators responsible for the implementation of the local special education programs and services design the local Special Education Entitlement Grant.

Student records are well maintained and comprehensive, including items like student assignment and career plans. There are no major issues in this area.

Title I requirements are met for this component for the Brockton Public Schools.

The Safe and Drug Free Schools program in the Brockton school district uses appropriate accounting and budget procedures in order to assure that budgets and amendments are on file for fiscal years 2003 and 2004. Excellent documentation was found in the Business Office and with the SDFSCA Coordinator ensuring that the expenditures were strictly related to the intent of the grant. The SDFSCA Coordinator meets regularly with staff in the business office and alerts them about expenditures.

Champion Charter School does not maintain an accurate register of students currently enrolled at the school and who are in need of special education.

The Title I requirements under this component are partially implemented for the Champion Charter School because the school has not developed a written Supplement Not Supplant policy and procedure plan and therefore has not implemented one.

**DEFINITION OF TERMS**  
**FOR THE RATING OF EACH COMPLIANCE CRITERION**

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

Several key areas of compliance with federal special education requirements have been highlighted in **SHADED TEXT** in the Program Review Criteria. These highlighted areas are included in the Massachusetts Continuous Improvement Plan (CIP) that is being used by the U.S. Department of Education, Office of Special Education Programs (OSEP), to track over time this state's compliance in these key areas.

## COMPONENT I: ASSESSMENT OF STUDENTS

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)
- Career and Technical Education (Report Issues #CTE1-4)
- English Learner Education (Report Issues # ELE 1-2)

CRITERION NUMBER	SPECIAL EDUCATION I. ASSESSMENT OF STUDENTS		
	Legal Standard		
SE 1	<p><b>Assessments are appropriately selected and interpreted for students referred for evaluation</b></p> <ol style="list-style-type: none"> <li>1. Tests and other evaluation materials are:               <ol style="list-style-type: none"> <li>a. validated</li> <li>b. administered and interpreted by trained individuals</li> <li>c. tailored to assess specific areas of educational need</li> <li>d. selected and administered to reflect aptitude and achievement levels</li> <li>e. as free as possible from cultural and linguistic bias</li> <li>f. provided in the student's native language or other mode of communication where feasible</li> <li>g. not the sole criterion for determining an appropriate educational program</li> <li>h. not only those designed to provide a single general intelligence quotient</li> <li>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</li> <li>j. technically sound instruments that may assess the relative contribution of cognitive and behavioral factors, in addition to physical or developmental factors</li> </ol> </li> <li>2. In interpreting evaluation data and making decisions, the district:               <ol style="list-style-type: none"> <li>a. uses information from a variety of sources to gather relevant functional and developmental information, including information provided by the parent</li> <li>b. ensures that information obtained from these sources is considered</li> <li>c. ensures that the placement decision conforms with placement in the least restrictive environment</li> <li>d. includes information related to enabling the student to be involved in and progress in the general curriculum</li> </ol> </li> </ol> <p><b>State Regulations</b> 28.04</p> <p><b>Federal Requirements</b> 300.532, 300.535</p>		

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Several of the student records indicate that not all assessments were appropriately selected and interpreted for students at the Champion Charter School.

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>
<b>SE 2</b>	<p><b>Required and optional assessments</b></p> <ol style="list-style-type: none"> <li>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"> <li>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.</li> <li>b. Educational assessment by a representative of the school district, including a history of the student’s educational progress in the general curriculum.</li> <li>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.</li> <li>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.</li> </ol> </li> <li>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"> <li>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.</li> <li>b. A psychological assessment by a certified school psychologist, licensed psychologist, or licensed educational psychologist, including an individual psychological examination.</li> <li>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</li> </ol> </li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p style="text-align: center;">and home situation and may include a home visit, with the agreement of the parent</p> <p>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:</p> <ul style="list-style-type: none"> <li>a. that no further assessments are needed and the reasons for this; and</li> <li>b. the right of such parents to request an assessment.</li> </ul> <p><b>State Regulations</b> 28.04 (1) and (2)</p> <p style="text-align: right;"><b>Federal Requirements</b> 300.532; 300.346.(a)(2)(v)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------------	--------------------------------------	--	------------

**Department of Education Findings:**

Student records at the Champion Charter School indicate that not all assessments in all areas related to the suspected disability were consistently found in the records.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 3</b>	<p><b>Special requirements for determination of specific learning disabilities</b> When the district proposes to evaluate a child suspected of having a specific learning disability, the following requirements are implemented: <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. <u>Criteria for determining the existence of a specific learning disability:</u></p> <ul style="list-style-type: none"> <li>1. the achievement is determined not to be commensurate with the age and ability of the child;</li> <li>2. a severe discrepancy exists in one or more areas between achievement and</li> </ul>





<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 4</b>	<p><b>Reports of assessment results</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> 28.04(2)(c)</p> <p><b>Federal Requirements</b> 300.532</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

In instances when assessments were completed by the school, reports were appropriately documented and made available (see SE 1 and SE 2).

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 5</b>	<p><b>Participation in general State and district-wide assessment programs</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>The district’s IEP Teams designate how each student will participate and, if necessary, provide an alternate assessment.</li> </ol> <p><b>State Regulations</b></p> <p><b>Federal Requirements</b> 300.138; 300.139</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

Interviews indicate that the district places a high priority in training teachers in how to give alternate assessments, particularly portfolio assessments for those applicable students. Several teachers within the district have been trained by the Department of Education in how to give alternate assessments and are now qualified to train teachers within districts as well as for the state.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>SE 6</b>	<p><b>Determination of transition services</b></p> <ol style="list-style-type: none"> <li>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 document this in the IEP.</li> <li>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.</li> <li>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.</li> <li>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).</li> <li>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.</li> <li>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</li> </ol> <p style="text-align: center;"><b>State Regulations</b> <span style="float: right;"><b>Federal Requirements</b></span></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	M.G.L. Ch.71B, Sections 12A-C 603 CMR 28.05(4)(c)

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

In the review of student records and documentation there is evidence to support that when a student is approaching graduation or the age of twenty-two and is in need of continuing services from adult human service agencies the district makes the referral to the appropriate agency. Through reviewing student records, vision statements for students 14 years and older were weak and often did not reflect the goals and ambitions of the student but rather the team.

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

In the review of student records and in interviews with staff and administrators, the onsite team found that at the Champion Charter School, the requirements of this criterion are only partially implemented. Vision statements did not contain sufficient detail regarding the student’s plans beyond graduation from school. Although graduation from school may be the most immediate objective of the student, the academic program including internships must be developed in relation to a student’s long term vision of future plans.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 7</b>	<p><b>Transfer of parental rights at age of majority and student participation and consent at the age of majority</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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"> <li>(a) If the parent has sought and received guardianship from a court of</li> </ol> </li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>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</p> <p>(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</p> <p>(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 school district and one other witness and is documented in written form and maintained in the student record.</p> <p><b>State Regulations</b> 603 CMR 28.08(5)</p> <p><b>Federal Requirements</b> 300.347(c), 300.517</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 8</b>	<p><b><u>Evaluation Team composition</u></b>  The following persons are members of the evaluation Team:</p>

CRITERION NUMBER		
	Legal Standard	
	<ol style="list-style-type: none"> <li>1. The child's parents</li> <li>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.</li> <li>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)</li> <li>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.</li> <li>5. The student, age fourteen and older, if he/she chooses</li> <li>6. Other individuals at the request of the student's parents</li> <li>7. At least one teacher or specialist trained in the area of the student's suspected special needs</li> <li>8. Individuals who are qualified to interpret the instructional implications of evaluation results</li> <li>9. Other individuals who may be necessary to write an IEP for the child, as determined by the Administrator of Special Education</li> <li>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.</li> <li>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.</li> </ol>	<p style="text-align: center;"><b>State Regulations</b> 28.02(22)</p> <p style="text-align: center;"><b>Federal Requirements</b> 300.344; 300.552</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

CRITERION NUMBER			
	Legal Standard		
SE 9	<p><b>Eligibility determination: Timelines for evaluation, provision of IEP and/or identification of other needed instructional programs</b></p> <ol style="list-style-type: none"> <li>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"> <li>a. provides an evaluation</li> <li>b. convenes a Team meeting</li> <li>c. determines whether the student has one or more disabilities</li> <li>d. determines if the student is making effective progress in school</li> <li>e. determines if any lack of progress is a result of the student's disability</li> <li>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</li> <li>g. develops an IEP where the student is found to need special education</li> <li>h. provides the parent with the proposed IEP, or a written explanation of the finding of no eligibility</li> <li>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</li> <li>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.</li> </ol> </li> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> 28.05(1) and (2)</p> <p><b>Federal Requirements</b> 300.534</p>		

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Champion Charter School has not performed required eligibility determinations. The school does not currently have in place procedures to ensure that referrals for special education are handled within the required timelines.

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>		
<b>SE 10</b>	<p><b>End of school year evaluations</b>            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>		
	<b>State Regulations</b> 28.05(1)	<b>Federal Requirements</b> 300.342	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 11</b>	<p><b>School district response to parental request for independent educational evaluation</b></p> <p>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> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> 28.04(5)</p> <p><b>Federal Requirements</b> 300.502(a)(3)(i)</p>



Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>		
<b>SE 12</b>	<b>Frequency of re-evaluation</b> 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.		
	<b>State Regulations</b> 28.04(3)	<b>Federal Requirements</b> 300.536	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Champion Charter School has not implemented the requirements of this criterion. In an effort to remedy this, the school has recently initiated a series of steps to improve its program in this area and to update the evaluative information on students with disabilities. It is essential that these revised program procedures be made permanent in order to bring the school into compliance with applicable standards and to effectively serve students with disabilities.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 13</b>	<p><b>Progress Reports and content</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> 28.07(3)</p> <p><b>Federal Requirements</b> 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)(viii) 300.347</p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Record reviews indicated that the progress report information sent to parents did not always include written information on the student's progress toward the annual goals in the IEP.

Champion Charter School	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

At Champion Charter School, no progress reports were found in student records.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 14</b>	<p><b>Annual review Team meeting</b></p> <p>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><b>State Regulations</b></p> <p><b>Federal Requirements</b></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	28.04(3) 300.343(c)

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

In the review of student records and in interviews with staff and administrators at the Champion Charter School, the onsite team found that annual IEP review meetings have not been conducted as required. Recent efforts by the school have led to the updating of certain student’s IEPs. These revised program procedures must be made permanent in order to the school to be in compliance with the regulations and to effectively serve the needs of students with disabilities.

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION I. ASSESSMENT OF STUDENTS</b>
	<b>Legal Standard</b>
<b>CTE 1</b>	<p>(a) Appropriate individual academic assessments are provided to all in-coming students. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 4.d</i></p> <p>Appropriate academic assessments administered include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• ABLE</li> <li>• APTICOM</li> <li>• CAT</li> <li>• METROPOLITAN</li> <li>• IOWA</li> <li>• MCAS</li> <li>• STANFORD 9</li> <li>• WRAT</li> </ul> <p>(b) Academic assessments provided to incoming students are used in planning students’ academic program. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)(d)</i></p>

CRITERION NUMBER	CAREER AND TECHNICAL EDUCATION I. ASSESSMENT OF STUDENTS		
	Legal Standard		
	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>

**Department of Education Findings:**

(a.) Appropriate individual academic assessments are provided to all incoming students. *Implemented.* Student files showed all but two having undergone SAGE and IOWA testing. Both individuals who had not undergone these two tests were unavailable for testing because of absenteeism, and Brockton’s scheduling does not allow re-scheduling of the test. Since all students who apply are allowed into the CTE program, this factor did not prevent enrollment, but Brockton should develop an alternate assessment methodology for those students who miss these scheduled tests as well as transfer students. The school also considers academic records as academic assessments.

(b.) Academic assessments provided to incoming students are used in planning students’ academic program.

*Implemented.* Please refer to CTE 1 for special conditions.

CRITERION NUMBER	Legal Standard		
<b>CTE 2</b>	<p>Appropriate career</p> <p>(a) Appropriate individual career and technical assessments are provided to all <u>in-</u> <u>coming</u> students. Appropriate career and technical assessments administered might include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• ACT Career Planning</li> <li>• ACDM</li> <li>• CAB</li> <li>• CIT</li> <li>• SAGE</li> <li>• Myers Briggs Type Indicator</li> <li>• ASVAB</li> <li>• CAP/COP</li> <li>• Bennett Mechanical Comprehension</li> <li>• DISCOVER</li> <li>• Self-Directed Search (SDS)</li> <li>• Career Inventories for the Learning Disabled</li> </ul> <p>(b) Career and Technical Education assessments provided to in-coming students are</p>		

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	used in planning students' technical and academic program. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)(d)</i>
	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

- i) Appropriate individual career and technical assessments are provided to all in-coming students. *Implemented* (see CTE 1 above).
- ii) Career and Technical Education assessments provided to incoming students are used in planning students' vocational and academic program.

*Implemented.* See 1 above.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>CTE 3</b>	Methods of measuring <u>academic</u> competency gain and competency attainment are appropriate. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)(c)</i>
	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

The school has sets of competency attainment, department tests, and even portfolio assessments in order to measure academic gain.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>CTE 4</b>	Methods of measuring <u>vocational</u> competency gain and competency attainment are appropriate. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)(c)</i>
	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

The school has a well-documented set of competencies that each instructor keeps. Some teachers have

portfolio systems in place. The auto program and culinary program are linked to national certification programs that document competency gains (NATEF and ProStart), and the Business program has a Microsoft MOUS program certification component. Internship and cooperative education programs record competency attainment using the work-based learning model. There is ample documentation of competency attainment.

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION I. ASSESSMENT OF STUDENT PROGRESS</b>	
	<b>Legal Standard</b>	
<b>ELE 1</b>	<p><b>Annual Assessment</b></p> <ol style="list-style-type: none"> <li>1. The district annually assesses the English proficiency of all limited English proficient (LEP) students.</li> <li>2. The following tests selected by the Massachusetts Board of Education are administered annually by trained staff to students who are English learners:               <ol style="list-style-type: none"> <li>i. the Massachusetts Comprehensive Assessment System (MCAS) in grades 3-12; and</li> <li>ii. the Language Assessment Scales for Reading and Writing (LAS-R and W) in grades 3-12, and the Massachusetts English Language Assessment – Oral (MELA-O) in grades K-12.</li> </ol> </li> </ol> <p style="text-align: center;"><b>Authority: G.L. c. 71A, § 7; 603 CMR 14.02</b></p>	
	<b>Rating: Implemented</b>	<b>District Response Required: No</b>

<b>CRITERION NUMBER</b>		
	<b>Legal Standard</b>	
<b>ELE 2</b>	<p><b>MCAS</b></p> <p>All limited English proficient students participate in the annual administration of the MCAS (Massachusetts Comprehensive Assessment System) exam in accordance with Department guidelines.</p> <p style="text-align: center;"><b>Authority: GL. C. 71A, § 7; G.L. c. 69, § 1I; N.C.L.B., Title I, Title VI</b></p>	
	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED: No</b>

## 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 19-20)
- Career and Technical Education (Report Issues # CTE 5-6)
- English Learner Education (Report Issues # ELE 3-6)





<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 16</b>	<p><b>Screening</b></p> <ol style="list-style-type: none"> <li>1. The school district conducts screening for three and four year olds and for all children who are of age to enter kindergarten. Such screening is 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.</li> <li>2. Participation in the screening program for three and four year olds is optional on the part of the parents.</li> <li>3. Provision is made for ongoing and periodic screening of all students as required by the Department of Public Health (vision, hearing, and posture).</li> </ol> <p><b>State Regulations</b> 28.03(1)(d) Chapter 71, section 57</p> <p style="text-align: right;"><b>Federal Requirements</b></p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

The district routinely only screens referred children first, then determine whether to conduct a full assessment in concerning areas. Screening tools are appropriate and administered by qualified personnel. All children receive an adaptive physical education screen. Website has information for parents on how to access screening and they put ads in local papers and in several languages.

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

Pursuant to the terms of the school’s charter, Champion Charter School only serves grades 9-12.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 17</b>	<p><b>Initiation of services at age three and Early Intervention transition procedures</b></p> <ol style="list-style-type: none"> <li>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</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>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.</p> <p>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> <p><b>State Regulations</b> 28.06(7)(b)</p> <p><b>Federal Requirements</b> 300.24(b)(3); 300.121(c); 300.132; 300.342(c)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

Student records showed Early Intervention referrals were generally received at age two-and-one-half, consent forms sent to parents, evaluations conducted and services made available to eligible children by their third birthday.

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

Pursuant to the terms of the school's charter, Champion Charter School only serves grades 9-12.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 18A</b>	<p><b>IEP development and content</b></p> <p>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.</p> <p>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</p>

CRITERION NUMBER				
	Legal Standard			
	<p>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.</p> <p>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.</p> <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>8.</p> <table border="0" data-bbox="407 982 1398 1115"> <tr> <td data-bbox="407 982 906 1079"> <b>State Regulations</b>            28.05(3), (4), (6) and (7)            28.06(2)         </td> <td data-bbox="906 982 1398 1115"> <b>Federal Requirements</b>            300.340-300.350; 300.343(a)            34 CFR Part 300, Appendix A,            Question #22.         </td> </tr> </table>		<b>State Regulations</b> 28.05(3), (4), (6) and (7) 28.06(2)	<b>Federal Requirements</b> 300.340-300.350; 300.343(a) 34 CFR Part 300, Appendix A, Question #22.
<b>State Regulations</b> 28.05(3), (4), (6) and (7) 28.06(2)	<b>Federal Requirements</b> 300.340-300.350; 300.343(a) 34 CFR Part 300, Appendix A, Question #22.			

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

CRITERION NUMBER		
	Legal Standard	
<b>SE 18B</b>	<b>Determination of placement; provision of IEP to parent</b> 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.	

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>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.</p> <p>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.</p> <p>4. The placement selected by the Team is the least restrictive environment consistent with the needs of the student.</p> <p>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.</p> <p><b>State Regulations</b> 28.05(6) and (7)</p> <p><b>Federal Requirements</b> 300.346</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

In the review of student records and interviews with staff and administrators, the onsite team found that at the Champion Charter School parents or students who are their own educational decision makers do not always leave with a written copy of agreements reached at TEAM meetings. Copies of typed IEPs are not always sent out to parents within the required timelines.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 19</b>	<p><b>Extended evaluation</b> 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> <p>1. The extended evaluation period is not used to deny programs or services</p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>determined to be necessary by the Team. If, prior to the extended evaluation, the Team determines that sufficient information is available 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.</p> <ol style="list-style-type: none"> <li>2. The extended evaluation period is not used to allow additional time to complete the required assessments.</li> <li>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 develop an IEP. The Team may decide to meet at intervals during the extended evaluation, but in all cases reconvenes promptly to develop an IEP when the evaluation is complete.</li> <li>4. The extended evaluation may extend longer than one week, but does not exceed eight school weeks.</li> <li>5. The extended evaluation is not considered a placement.</li> </ol> <p><b>State Regulations</b> 28.05(2)(b)</p> <p style="text-align: right;"><b>Federal Requirements</b></p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	----------------------------	------------------------------------	------------

**Department of Education Findings:**

Although the team facilitators clearly understood the use of when it is appropriate to use an Extended evaluation and when it is applicable to use an IEP amendment, teacher interviews indicated that there was confusion about the distinction between the two.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

In the review of student records an extended evaluation was not reviewed, however new staff did understand this requirement.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 20</b>	<b>Least restrictive program selected</b>

CRITERION NUMBER					
	<b>Legal Standard</b>				
	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. The district does not remove an eligible child from the general education classroom solely because of needed modification in the curriculum.</li> <li>4. If a student's IEP necessitates special education services in a day or residential facility or an out-of-district educational collaborative program, the IEP Team considers whether the student requires special education services and support to promote the student's transition to placement in a less restrictive program.</li> </ol>				
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><b>State Regulations</b></td> <td style="width: 50%;"><b>Federal Requirements</b></td> </tr> <tr> <td>28.06(2)(a); Chapter 71B, section 3</td> <td>34 CFR 300.130; 300.550-300.556</td> </tr> </table>	<b>State Regulations</b>	<b>Federal Requirements</b>	28.06(2)(a); Chapter 71B, section 3	34 CFR 300.130; 300.550-300.556
<b>State Regulations</b>	<b>Federal Requirements</b>				
28.06(2)(a); Chapter 71B, section 3	34 CFR 300.130; 300.550-300.556				

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------------	----------------------------	--	-----------

**Department of Education Findings:**

Documentation review, record review and interviews indicated that the district does an outstanding job in selecting least restrictive environment for all students in the district. The district has embraced the spirit of providing equal education to all students with disabilities. At the Phoenix Program the goal for all students is to transition back to the high school where possible. At the Junior High School there is a class for students with autism spectrum disorder but within that separate program, accommodations are made so students can move back and forth into regular education classes. Inclusion classes are well supported with a teaching composition of a dual certified teacher, a regular education teacher, a paraprofessional, and a MTA (a paraprofessional with a college degree).

Champion Charter School	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------------	----------------------------	--	-----------

**Department of Education Findings:**

The school has established an inclusive setting for the delivery of special education services. Students with disabilities receive specialized instruction from a certified special educator in a small group classroom alongside their regular education peers.

CRITERION NUMBER		
	Legal Standard	
SE 21	<p><b>School day and school year requirements</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>4. Specialized transportation schedules do not impede a student’s access to a full school day and program of instruction.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> 28.05(4) Chapter 69, section 1G</p> <p><b>Federal Requirements</b> 300.309(b)</p>	

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Records review and interviews indicate that the Team does not routinely consider the individual need for an educational program that is less than or more than the regular school day or school year and indicate on the IEP why the shorter or longer program is necessary.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>		
<b>SE 22</b>	<p><b>IEP implementation and availability</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>At the beginning of each school year, the district has an IEP in effect for each eligible student within its jurisdiction.</li> <li>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.</li> <li>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 resolved.</li> </ol>		
	<b>State Regulations</b> 28.05(7)(b); 28.06(2)(b)(2)	<b>Federal Requirements</b> 300.342	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

IEP's were not always implemented upon enrollment at the charter school.

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>		
<b>SE 23</b>	<p><b>Confidentiality of personally identifiable information</b> The district protects the confidentiality of any personally identifiable information</p>		



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	that is collected, used or maintained in accordance with federal and state law.  <b>State Regulations</b> 603 CMR 23.00 (Student Records Regulations) <b>Federal Requirements</b> 300.560-576; Family Educational Rights and Privacy Act (FERPA)

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>CIVIL RIGHTS METHODS OF ADMINISTRATION II. STUDENT IDENTIFICATION AND PLACEMENT</b>		
	<b>Legal Standard</b>		
<b>MOA 1</b>	<b>Identification of limited-English-proficient students</b> The district uses qualified staff and appropriate procedures and assessments to identify students who are limited-English-proficient and assess their level of English proficiency.  Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a),(b); EEOA: 20 U.S.C. 1703(f); 603 CMR 14.02; M.G.L c. 76, s. 5; 603 CMR 26.03		

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

Interviews indicated that the charter school was not using state and district mandated assessments or appropriate procedures to identify students who are limited-English-proficient.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 2</b>	<p><b>Program modifications and support services for limited-English-proficient students</b></p> <p>The district implements necessary program modifications and support services to serve effectively limited-English-proficient students who need special language assistance. Such program modifications and support services:</p> <ol style="list-style-type: none"> <li>1. are based on sound education theory;</li> <li>2. provide for English-language development;</li> <li>3. provide for the meaningful participation of limited-English-proficient students in the district's educational program;</li> <li>4. are evaluated and appropriately revised in an ongoing manner; and</li> <li>5. are demonstrably useful in assisting students receiving such program modifications and services to gain English language proficiency.</li> </ol> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a),(b); EEOA: 20 U.S.C. 1703(f); M.G.L. c. 71, s. 38Q1/2; 603 CMR 28.03(3)(a); M.G.L. c. 71A, ss. 2(e), 4; 603 CMR 14.04; M.G.L. c. 76, s. 5; 603 CMR 26.03</p>

Brockton Public Schools	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

See findings under ELE 6, ELE 8, ELE 11, ELE 15 and ELE 17

Champion Charter School	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

Interviews indicate that although students are in need of support services for limited- English - proficient students, they are not provided.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 3</b>	<p><b>Access to a full range of education programs</b>  Students from linguistic, racial, and ethnic minorities; males; females; homeless students; and students with disabilities all have access equal to that of other students to the general education program and the full range of any occupational/vocational education programs offered by the district.</p> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a),(b); EEOA: 20 U.S.C. 1703(f); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.34, 106.35; Section 504: 29 U.S.C. 794; 34 CFR 104.4; Title II: 42 U.S.C. 12132; 28 CFR 35.130; IDEA: 34 CFR 300.305; NCLB: Title III, Part A, Sec. 3121(c)(1)(C); Title X, Part C, Secs. 721, 722(g)(4); Mass. Const. amend. art. 114; M.G.L. c. 71A, s. 7; c. 76, s. 5; 603 CMR 26.03</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 4</b>	<p><b>Placement of disabled, linguistic and racial minority, homeless, and female/male students</b>  Patterns of placement in district programs and services for disabled students, linguistic and racial minority students, homeless students, and females are consistent with patterns of placement for non-disabled students, linguistic and racial majority students, nonhomeless 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>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a),(b); EEOA: 20 U.S.C. 1703(f); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.34, 106.35, 106.36; Section 504: 29 U.S.C. 794; 34 CFR 104.4; Title II: 42 U.S.C. 12132; 28 CFR 35.130; NCLB: Title III, Part A, Sec. 3121(c)(1)(C); Title X, Part C, Secs. 721, 722(g)(4); Mass. Const. amend. art. 114; M.G.L. c. 71A, s. 7; c. 71B, s. 6; c. 76, s. 5; 603 CMR 26.03</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 5A</b>	<p><b>Placement of homeless students</b>  According to the best interest of the homeless student, the district either:</p> <ol style="list-style-type: none"> <li>1. continues the student’s education in the student’s school of origin for the duration of homelessness and, if the student becomes permanently housed during an academic year, for the remainder of that academic year; or</li> <li>2. enrolls the student in any public school that non-homeless students who live in the attendance area where the student is actually living are eligible to attend.</li> </ol> <p>If the district sends the student to a school other than the school of origin or a school requested by the student’s parent or guardian, it provides the parent or guardian with a written explanation, including a statement of the right to appeal the placement. If the student is unaccompanied, notice of the right to appeal is provided to the student.</p> <p>NCLB: Title X, Part C, Sec. 722(g)(3)(A), (B)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 5B</b>	<p><b>Immediate enrollment of homeless students</b>  The school where a homeless student is placed immediately enrolls the student even if he or she is unable to produce records normally required for enrollment, such as previous academic records, medical records, or proof of residency.</p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	NCLB: Title X, Part C, Sec. 722(g)(3)(C)(i)

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 5C</b>	<p><b>Transportation of homeless students to and from the school of origin</b>          If a homeless student is continuing to attend his or her school of origin but lives in another district than that in which the school of origin is located, the two districts agree on a method to apportion responsibility and costs for transportation to and from the school of origin. If they cannot agree on a method, the responsibility and costs are shared equally.</p> <p>NCLB: Title X, Part C, Sec. 722(g)(1)(J)(iii)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 6</b>	<b>Availability of in-school programs for pregnant students</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>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>Title IX: 20 U.S.C. 1681; 34 CFR 106.40(b)</p>

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

Interviews, documentation review, and onsite tour indicate the successful Teen Mothers program at the high school that allows students after giving birth to return to the high school by offering high quality childcare for their children, so that the student can complete courses in order to graduate.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>TITLE 1 II. STUDENT IDENTIFICATION AND PLACEMENT</b>
	<b>Legal Standard</b>
<b>TI 19</b>	<p>(For Targeted Assistance Schools) A description is available of the multiple, objective, educationally-related criteria used to identify eligible students in grade 3 and higher who are failing or most at-risk of failing to meet the high student academic performance and assessment standards required of all students.</p> <p>1115 (b)(1)(B) NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not a targeted assistance school.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 20</b>	There is evidence that limited English proficient students are identified as eligible and selected for Title I services on the same basis as other students selected to receive services.  1115(b)(2)(A) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not a targeted assistance school.

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION II. STUDENT IDENTIFICATION AND PLACEMENT</b>
	<b>Legal Standard</b>
<b>CTE 5</b>	Career and technical education students are appropriately identified for services and activities. * <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4);(6);(7)</i>  <i>*Perkins definition of “vocational and technical education.” Vocational and technical education means organized educational activities that offer a sequence of</i>

CRITERION NUMBER	CAREER AND TECHNICAL EDUCATION II. STUDENT IDENTIFICATION AND PLACEMENT
	<b>Legal Standard</b>
	<p>courses that provides individuals with the academic and technical skills the individuals need to prepare for further education and for careers in current or emerging employment sectors.</p> <p><i>Chapter 74 definition of “vocational technical education program.”</i> A program approved by the Department that provides instruction in academic and technical subject matter and employability skills necessary for high wage/high demand occupations and further education.</p>
	<p><b>Rating: Implemented</b> <span style="float: right;"><b>District Response Required: No</b></span></p>

**Department of Education Findings:**

A recent change in reporting will increase non-Chapter 74 enrollment figures dramatically. These students are enrolled in a sequence of courses in the Business programs of the High School.

CRITERION NUMBER	Legal Standard
<b>CTE 6</b>	<p>Special population students are appropriately identified for services. * <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)(d)</i></p> <p>*Perkins identified special populations.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> individuals with disabilities</li> <li><input type="checkbox"/> individuals from economically disadvantaged families, including foster children</li> <li><input type="checkbox"/> individuals preparing for nontraditional training and employment</li> <li><input type="checkbox"/> single parents, including single pregnant women</li> <li><input type="checkbox"/> displaced homemakers</li> <li><input type="checkbox"/> individuals with other barriers to educational achievement, including individuals with limited English proficiency</li> </ul>
	<p><b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span></p>

**Department of Education Findings:**

The school has ample support mechanisms in place for special needs students. There are bilingual support staff in place for the 280 Cape Verdean/Portuguese, 80 Haitian and 40 Spanish students in the school. Finally, the school’s figures on non-traditional enrollments are quite high. There is strong evidence that Brockton pays appropriate attention to its mandate to identify and service special populations.



CRITERION NUMBER	ENGLISH LEARNER EDUCATION II. STUDENT IDENTIFICATION AND PLACEMENT	
	Legal Standard	
ELE 3	<p data-bbox="399 474 662 506"><b>Initial Identification</b></p> <p data-bbox="399 541 1373 606">The district has procedures that actively seek to identify limited English proficient students.</p> <p data-bbox="399 678 773 709"><b>Authority: G.L. c. 71A, § 4, 5</b></p>	
	<b>Rating: Implemented</b>	<b>District Response Required: No</b>

CRITERION NUMBER		
	Legal Standard	
ELE 4	<p data-bbox="399 1079 651 1110"><b>Waiver Procedures</b></p> <ol data-bbox="451 1150 1409 1822" style="list-style-type: none"> <li data-bbox="451 1150 1409 1276">1. Waivers may be granted based on parent request, providing the parent annually visits the school and provides written informed consent. Parents must be provided with program descriptions <i>in a language they can understand</i>.</li> <li data-bbox="451 1283 1409 1822">2. Students who are under age 10, may only be granted waivers if, (a) the student has been placed in an English language classroom for at least 30 calendar days, (b) the school certifies in no less than 250 words that the student “has special and individual physical or psychological needs, separate from lack of English proficiency” that requires an alternative program, and (c) the waiver is authorized by both the school superintendent and principal. All approved and unapproved waivers must be placed in the student’s permanent school record. For students under age 10, both the superintendent and the principal must authorize the waiver, and it must be made under guidelines established by, and subject to the review of the local school committee. These guidelines may, but are not required to, contain an appeals process. Students who are over age 10 may be granted waivers when it is the informed belief of the school principal and educational staff that an alternative program would be better for the student’s overall educational progress. Students receiving waivers may be transferred to other bilingual programs. See 603 CMR 14.04 on the Department’s website.</li> </ol> <p data-bbox="399 1854 743 1885"><b>Authority: G.L. c. 71A, § 5</b></p>	

<b>CRITERION NUMBER</b>				
	<b>Legal Standard</b>			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><b>Rating: Implemented</b></td> <td style="width: 30%; text-align: center;"><b>DISTRICT RESPONSE REQUIRED:</b></td> <td style="width: 20%; text-align: right;"><b>No</b></td> </tr> </table>	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>		

<b>CRITERION NUMBER</b>				
	<b>Legal Standard</b>			
<b>ELE 5</b>	<p><b>Program Placement and Structure</b></p> <ol style="list-style-type: none"> <li>1. The district places LEP students in <ol style="list-style-type: none"> <li>i. “sheltered English immersion” classrooms, in which nearly all books and instructional materials are in English, but with the curriculum and presentation designed for students who are learning the language. All reading, writing and subject matter are taught in English. Teachers may use an English learner’s native language, when necessary, for clarification purposes. Districts may also modify general education classrooms, so that the activities and instruction in those classrooms provide sheltered English instruction to LEP students, or</li> <li>ii. “two-way bilingual” classrooms, in which students develop language proficiency in two languages by receiving instruction in English and another language in a classroom that is usually comprised of an equal number of proficient English speakers and proficient speakers of the other language.</li> <li>ii. (for kindergarten students) either a sheltered English immersion, two-way bilingual, or an English language mainstream classroom with assistance in English language acquisition, including, but not limited to, English as a second language.</li> </ol> </li> </ol> <p><b>Authority G.L. c. 71A, § 2, 4, 7; Title VI</b></p>			
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><b>Rating: Commendable</b></td> <td style="width: 30%; text-align: center;"><b>DISTRICT RESPONSE REQUIRED:</b></td> <td style="width: 20%; text-align: right;"><b>No</b></td> </tr> </table>	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>		

**Department of Education Findings:**

Brockton has a wealth of programs that serve the needs of all its limited English proficient students. Brockton’s diverse student population has been the impetus for the creation of sheltered English immersion programs, two-way bilingual programs, transitional bilingual programs in multiple languages, as well as general education classes for those who choose them.

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>ELE 6</b>	<p><b>Program Exit and Readiness</b></p> <ol style="list-style-type: none"> <li>1. The district does not re-designate a student from Limited English Proficient (LEP) to Formerly Limited English Proficient (FLEP), until:               <ol style="list-style-type: none"> <li>a) s/he is deemed English proficient, and</li> <li>b) can participate meaningfully in all aspects of the district’s mainstream education program without the use of adapted or simplified English materials.</li> </ol> </li> <li>2. The time in which LEP students receive sheltered English immersion instruction is not normally intended to exceed one school year.</li> <li>3. Districts may not limit or cap the amount of time in which an LEP student is placed in a language support program and may only exit the student from such a program after determining that the student is proficient in English.</li> </ol> <p><b>Authority: Title VI; G.L. c. 71A, § 4</b></p>		
	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>

**Department of Education Findings:**

Reviews of student records and interviews with staff indicate that some students are exited from ELE programs before they are ready. The district indicates that it has devised exit criteria, but evidence suggests they are not being consistently implemented

### 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 21-23)
  - Safe and Drug Free Schools (Report Issues # SDF 1-3)
  - Career and Technical Education (Report Issues # CTE 7-8)
  - English Learner Education (Report Issue # ELE 7)

CRITERION NUMBER	SPECIAL EDUCATION III. PARENTAL INVOLVEMENT	
	Legal Standard	
SE 24	<p><b>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</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. Notice is given by the district within a reasonable time for all other actions.</li> <li>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</li> <li>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</li> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> 28.04(1)</p> <p><b>Federal Requirements</b> 300.503(a)</p>	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

In the review of student records and in interviews with staff and administrators, the onsite team found that at the Champion Charter School the required notice letters are not always sent to the parent or the student over 18 in a timely manner.

<b>CRITERION NUMBER</b>		
	<b>Legal Standard</b>	
<b>SE 25</b>	<p><b>Parental consent</b>            In accordance with state and federal law, the school district obtains informed parental consent as follows:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. The school district obtains consent before initiating extended evaluation services.</li> <li>3. The school district obtains consent to the services proposed on a student's IEP before providing such services.</li> <li>4. The school district obtains consent prior to placing a student in an initial special education placement and for any subsequent placement.</li> <li>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.</li> <li>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.</li> <li>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</li> </ol> <p><b>State Regulations</b> 28.07(1)</p> <p><b>Federal Requirements</b> 300.500(b)(1)</p>	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

In the review of student records and in interviews with staff and administrators, the onsite team found that in instances in which the school is unable to obtain parental consent to a reevaluation or placement, and the lack of consent will result in denial of a free and appropriate public education to the student, the Champion Charter School does not proceed to the Bureau of Special Education Appeals as required under item 7, above.

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>	
<b>SE 26</b>	<p><b>Parent participation in meetings</b></p> <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. 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.</li> <li>3. The district schedules the meeting at a mutually agreed upon time and place; and documents such efforts.</li> <li>4. If neither parent can attend, the district uses other methods to ensure parent participation, including individual or conference telephone calls, or video conferencing.</li> <li>5. 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.</li> </ol>	
	<b>State Regulations</b> 28.02(22)	<b>Federal Requirements</b> 300.345(d), 300.501

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Raymond School was exemplary in using innovative and successful techniques to facilitate parent's participation in the IEP team meeting.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 27</b>	<p><b>Content of Team meeting notice to parents</b></p> <ol style="list-style-type: none"> <li>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.71 B, §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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> 28.04(b)</p> <p style="text-align: right;"><b>Federal Requirements</b> 300.503-504</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 28</b>	<p><b>Parent provided the IEP or notice of no eligibility together with notification of procedural safeguards and parents' rights</b></p> <p>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.</p> <p><b>State Regulations</b> 28.05(7)</p> <p style="text-align: right;"><b>Federal Requirements</b> 300.345(f)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 29</b>	<p><b>Communications are in English and primary language of home</b></p> <p>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.</p> <p>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> <p><b>State Regulations</b> 28.07(g)</p> <p><b>Federal Requirements</b> 300.345(e)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 30</b>	<p><b>Elements of notice of parents' rights</b></p> <p>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><b>State Regulations</b> MGL c. 71B, Sec. 3</p> <p><b>Federal Requirements</b> 300.503-504</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>		
<b>SE 31</b>	<p><b>State and district responsibility for educational surrogate parents</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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 .</li> <li>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.</li> </ol>		
	<b>State Regulations</b> 28.07(7)	<b>Federal Requirements</b> 300.515	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------



CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION III. PARENTAL INVOLVEMENT
	<b>Legal Standard</b>
<b>MOA 7</b>	<p><b>Information to be translated into languages other than English</b>  When students have parents or guardians with limited English language skills, general announcements and notices of extracurricular activities and other opportunities are distributed to them in the primary language of the home. When persons with limited English language skills reside in the community, school recruitment and promotional materials are disseminated to them in their primary language(s).</p> <p>Title VI; EEOA: 20 U.S.C. 1703(f); M.G.L. c. 76, s. 5; 603 CMR 26.02(2)</p>

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------------	----------------------------	--	-----------

**Department of Education Findings:**

The district is to be commended for its tremendous efforts in helping parents of students in the community with limited English language skills understand general announcements by sending out a liaison into the home. In addition, the district has an impressive array of placement notification letters, report cards, notices of school events, progress reports, home language surveys, and special education documents translated into all of the native languages represented in the district. In addition, the district ensures that interpreters are present at all meetings in which the parents may not be fluent in English. Parent liaisons contact parents of limited English proficient students to facilitate involvement in school activities. The district has also made this resource available to other districts who may be struggling with the implications of a rapidly emerging limited English proficient student population and can serve as a model for making these documents available to parents.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------------	----------------------------	--	-----------

CRITERION NUMBER	TITLE 1 III. PARENTAL AND COMMUNITY INVOLVEMENT
	<b>Legal Standard</b>
<b>TI 21</b>	<p><u>School District Requirements:</u></p> <ol style="list-style-type: none"> <li>1. Title I programs, activities, and procedures are planned and implemented providing meaningful consultation with parents of participating children. 1118(a)(1)</li> <li>2. The district's written parental involvement policy is developed and annually reevaluated with, agreed upon, and distributed to parents of participating children. 1118(a)(2)</li> </ol>

CRITERION NUMBER	TITLE 1 III. PARENTAL AND COMMUNITY INVOLVEMENT
	<b>Legal Standard</b>
	<p>3. The district provides coordination, technical assistance, and other resources to assist schools in planning and implementing effective parental involvement activities to improve student achievement and school performance. 1118(e)(2) NCLB</p> <p>4. The district builds schools’ and parents’ capacity for strong parental involvement.</p> <p>5. Title I parental involvement services are integrated with other programs’ parental involvement strategies at the school and district level.</p> <p>6. The district conducts, with involvement of parents, annual evaluation of the content and effectiveness of the parental involvement policy in improving student achievement and parental involvement and uses the evaluation results. 1118(a)(2)(A) – (G)</p> <p>7. The district has a system for schools to provide parents with “right to know” information:</p> <ul style="list-style-type: none"> <li>a. Status of school identified for school improvement</li> <li>b. Notice of teacher qualifications and right of parent to inquire</li> <li>c. Notice, if applicable, that students are taught by non- highly qualified teachers for more than four weeks.</li> </ul> <p style="text-align: center;">1118(d)(3)(B)</p>

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------------	----------------------------	--	-----------

**Department of Education Findings:**

The district has provided opportunities to parents to be actively involved in all the required criteria. Parent activities were planned with input from parents. Resources and participation of teachers at the workshops and meetings ensured the success of the services and their positive impact on student achievement. The instrument developed by the Brockton school system to assess the effectiveness of the parent services at the end of the school year is an effective evaluation tool that has incorporated all the required elements of parental involvement.

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------------	--------------------------------------	--	------------

**Department of Education Findings:**

Document review and interviews indicate that as a condition of admission to Champion Charter School all students must be presented by a sponsor or parent who agrees in writing to assist the student in reaching the goal of earning a diploma. However, parents are not offered opportunities to be involved in the planning and implementation process of Title I services. The Champion Charter

School has not developed a written parental involvement policy or provided parents with “right to know” information.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 22</b>	The district and schools provide materials and training to Title I parents to enable them to improve their children’s achievement (e.g., literacy training, using technology to foster parental involvement, frequent meetings with teachers, etc.).  1118(e)(2) NCLB

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

Workshops and presentations on academic subjects have contributed to parental awareness on the goals, curriculum and activities that school teachers utilize to address students’ needs. Constant communication channels between teachers and parents have established a productive dialogue.

Champion Charter School	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School did not provide the required documentation in order to determine compliance with the requirements under this criterion.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 23</b>	<u>School Requirements:</u> 1. The school has a written parent involvement policy that is developed jointly with, agreed upon, and distributed to parents of participating children. 1118(b)(1) NCLB 2. Parents are notified of the school’s Title I parent involvement policy in an understandable format. To the extent practicable, this information is provided in the language of the home.

CRITERION NUMBER	
	<b>Legal Standard</b>
	<p>1118(b)(1) NCLB</p> <p>3. The school implements the following parent requirements:</p> <ul style="list-style-type: none"> <li>a. Convenes an annual informational meeting at a time convenient for parents;</li> <li>b. Provides parents with opportunities for regular meetings regarding the education of their children; and offers a flexible number of meetings (e.g., in the early morning or in the evening, etc.);</li> <li>c. Involves parents in an organized, ongoing, timely way in the planning, review, and improvement of school parental involvement policy and schoolwide programs;</li> <li>d. Provides parents with timely information about Title I programs, descriptions, and an explanation of the Title I curriculum and assessment procedures; and</li> <li>e. Provides parents with materials and training to improve their children's achievement.</li> </ul> <p>1118 (c)(1)-(4); 1118 (e)(2) NCLB</p> <p>4. Each school develops jointly with parents a School-Parent Compact that outlines shared responsibilities for improving student achievement and achieving the state's high standards.</p> <p>1118(d) NCLB</p>

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

All required activities of this criterion are met. The district's exemplary practices ensure compliance with the regulations, such as informing parents of their rights under Title I and NCLB. These practices build parents' capacity for effective involvement in the planning, implementation and evaluation of the Title I services that are provided to all parents in the school district.

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School 2003 Annual Report states that parents and other adults (sponsors) play a crucial role in the Champion Horace Mann Charter School community and are given the opportunity to be informed about their student's academic achievement and performance. However, document review and interviews indicate that the school has not developed a written Parental Involvement Policy and a School-Parent Compact as required.

CRITERION NUMBER	SAFE AND DRUG FREE SCHOOLS III. PARENTAL INVOLVEMENT		
	<b>Legal Standard</b>		
<b>SDF 1</b>	<p>The Safe and Drug Free Schools program develops its application through timely and meaningful consultation with community agencies, parents, students and representatives from the schools and prevention community.</p> <p>[Title IV Sec. 4115 (b) (2) (E)]</p>		
	<b>Rating: Commendable</b>	<b>District Response Required: No</b>	

**Department of Education Findings:**

Based on interviews, documentation and observation of the Advisory Council meeting, there is an exemplary model for consultation. Community agencies, hospitals, parents, students, DA’s office, police, private schools, principals and administrators, teachers, nurses, health agencies and groups with expertise in drug and violence prevention all participate in the development of the SDFSCA application. Brockton has established an Advisory Council consisting of over 43 members that meets every month with additional meetings for various workgroups. This network of community-wide members has a very active and involved role in the planning, delivery and evaluation of the substance and violence prevention programs of the school system, as well as in the community. This ongoing collaboration provides a very clear and consistent safe and drug free message to school staff, students and parents. Also the SDFSCA Coordinator and the Director of Health are members of many community, state and school task forces/councils/committees that assist in the formulation of the application with their expertise and resources and ensure ongoing continuity, collaboration and communication. Several of the community agencies involved include, but are not limited to: Mayor’s Office, Caritas Good Samaritan Medical Center, Brockton Hospital, Prevention and Community Center, American Cancer Society, Brockton Family and Community Center, District Attorney’s Office, Brockton Health Center, American Red Cross, Brockton Alliance for Youth, Womensplace Crisis Center, Boys and Girls Club, YMCA, BAMSI-Ed. Services, Pediatric Associates of Brockton, Health Care of Southeastern MA. and Catholic Charities.

CRITERION NUMBER			
	<b>Legal Standard</b>		
<b>SDF 2</b>	<p>The local education agency coordinates such agency’s programs and projects with community-wide efforts to achieve SEA’s goals for drug and violence prevention.</p> <p>[NCLB Title IV Sec. 4114 (c) (1) (B)]</p>		
	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED: No</b>	

**Department of Education Findings:**



Based on interviews and documentation, there is an exemplary level of participation by community agencies in activities such as surveys, focus groups, program development, evaluations and meetings regarding the prevalence of drugs and violence in the community. The community agencies are informed and participate in the monthly meetings of the Advisory Council providing timely and meaningful consultation in the district’s drug and violence activities. There is a strong collaboration with community agencies in writing competitive grants and successfully bringing funding from local, state, federal and other foundations into school programs. Also some of the community agencies provide services to the district. This includes, but is not limited to: Catholic Charities provide interpreters in several languages for parent activities and translates documents and material for the SDFSCA Coordinator; professional development is provided to teachers, nurses, school staff and parents on an on going basis by Brockton Hospital and the Caritas Good Samaritan Medical Center.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SDF 2A</b>	The local education agency coordinates such agency’s programs and projects with other federal, state and local programs for drug-abuse and violence prevention. [Title IV Sec. 4114 (c) (1) (B)]
	<b>DISTRICT RESPONSE REQUIRED:</b>
	<b>Rating: Commendable</b> <span style="float: right;"><b>No</b></span>

**Department of Education Findings:**

Based on interviews and documentation there is evidence that Brockton has well coordinated federal, state and local programs for safety, and drug-abuse and violence prevention. The district has also coordinated the delivery of prevention education by community agencies and federal, state and local programs over the two years covered by this program review. This includes, but is not limited to: the middle schools’ resource officers; safety programs from the MBTA Community Police; Stranger Danger, Doc Owl, GREAT and Roary the Bulldog with Public Safety grants; the DA’s Mock Trials/peer mediation; anti-gang programs at the middle schools and high schools; Child Lures Prevention by the Goddard Health Foundation; after school programs with the YMCA, police and Boys and Girls Clubs; and Domestic Violence programming presented by the Brockton Family and Community Resources Inc.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SDF 3</b>	There are program activities implemented to promote the involvement of parents. [Title IV Sec. 4116 (a)(1)]
	<b>DISTRICT RESPONSE REQUIRED:</b>
	<b>Rating: Commendable</b> <span style="float: right;"><b>No</b></span>

**Department of Education Findings:**

Based on documentation and interviews, there is exemplary evidence that the district promotes, involves, trains and maintains a strong parent component from the early learning center to the high schools. Parent programs were offered every month in almost every school and/or district wide. These trainings along with parents' programming are open to all BPS parents, private school parents as well as any parent in the community. In collaboration with other agencies interpreters were provided as well as materials and information in other languages. There is supportive documentation that the Parent Information Center in collaboration with the SDFSCA Coordinator, parent liaisons, schools and community agencies reached over 55,000 parents and students at various trainings such as, but not limited to: Second Step training, smoking cessation, Life Skills training/awareness, Responsive Classroom program, Safety nights, Doc Owl night, peer mediation, anger management program and G.R.E.A.T. program. Parents are provided progress reports regarding program outcomes and accomplishments via newsletters, local newspaper articles every Thursday, School Committee meetings, local cable, radio stations, PTO meetings and postings in public places. In addition, parents have the opportunity to participate in focus groups and meetings regarding the prevalence of drug use and violence problems several times over the year and provide input to the district in the development of the grant application and program implementation.

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION III. PARENT AND COMMUNITY INVOLVEMENT</b>	
	<b>Legal Standard</b>	
<b>CTE 7</b>	Parents, students, teachers, representatives of business and industry, labor organizations, postsecondary institutions, 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. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (3)</i>	
	<b>Rating: Implemented</b>	<b>District Response Required: No</b>

**Department of Education Findings:**

The rosters show evidence of enrollment from the above groups. Minutes of meetings reflect involvement with development, implementation and evaluation of the career and technical education programs.

<b>CRITERION NUMBER</b>		
	<b>Legal Standard</b>	
<b>CTE 8</b>	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:	

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	(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>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4) (a)(b); (6); (7)</i>
	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

Although this criterion is substantially implemented, Brockton is advised to make more materials available in Creole/Portuguese (for the Cape Verdean and Portuguese students and parents). Although parents are encouraged to attend exploratory and career nights, attendance is often disappointing. Brockton should re-examine its announcements of these events to attempt to ensure greater parent participation. Current publicity is extensive but may be failing to draw in large numbers for cultural reasons.

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION III. PARENTAL INVOLVEMENT</b>
	<b>Legal Standard</b>
<b>ELE 7</b>	<b>Parent Involvement</b>  The district develops a mechanism for including parents or guardians of LEP students in matters pertaining to their children’s education.  <b>Authority: Title VI</b>
	<b>Rating: Commendable</b> <span style="float: right;"><b>District Response Required: No</b></span>

**Department of Education Findings:**

The district has instituted a program that provides parent liaisons in each building in which there are ELE students. Many persons interviewed reported that this resource is vital in involving parents in the education of ELE children. Additionally, the use of liaisons often eases the transition for families newly arriving in the district.

## 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 24-28)
  - Safe and Drug Free Schools (Report Issue # SDF 4)
- Career and Technical Education (Report Issues # CTE 9-16)
  - English Learner Education (Report Issues #8-10)

<b>CRITERION NUMBER</b>	<b>SPECIAL EDUCATION IV. CURRICULUM AND INSTRUCTION</b>	
	<b>Legal Standard</b>	
<b>SE 33</b>	<p data-bbox="407 415 889 443"><b>Involvement in the general curriculum</b></p> <ol data-bbox="407 447 1398 877" style="list-style-type: none"> <li data-bbox="407 447 1398 573">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.</li> <li data-bbox="407 577 1398 703">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.</li> <li data-bbox="407 707 1398 812">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.</li> <li data-bbox="407 816 1398 877">4. In the IEP the district documents the student's participation in the general curriculum.</li> </ol> <p data-bbox="407 915 630 976">State Regulations 28.05(4)(a) and (b)</p> <p data-bbox="980 915 1281 976">Federal Requirements 300.347(a)(1)(i); 300.137</p>	

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

Through interviews and documentation review the district personnel have an excellent understanding of the connection between the Massachusetts Curriculum Frameworks and the expectations of the state for the student performance as well as the rights of students with disabilities for be full participants in the general curriculum.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>		
	<b>Legal Standard</b>	
<b>SE 34</b>	<p data-bbox="407 1787 1029 1814"><b>Continuum of alternative services and placements</b></p> <p data-bbox="407 1818 1406 1879">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,</p>	

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	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.
	State Regulations Federal Requirements 300.551;300.305; 300.123

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

Record reviews, documentation review and interviews indicate that the district provides a wide array of continuum of alternative services and placements. The district has a public day special education school, an alternative program, and classes for students on the autism spectrum.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 35</b>	<p><b>Specialized materials and assistive technology</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol> <p>State Regulations Federal Requirements 34 CFR 300.308, 34 CFR 300.346</p>

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

Record reviews, documentation and interviews indicate that the district has an outstanding commitment to using assistive technology to help students access the curriculum as well as the world

around them. The district provides an impressive array of specific training through workshops on how to use assistive technology in the classroom to both regular education and special education teachers.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>		
<b>SE 36</b>	<p><b>IEP implementation, accountability and financial responsibility</b></p> <ol style="list-style-type: none"> <li>The district ensures that IEPs are implemented without delay upon parent consent.</li> <li>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.</li> <li>The district makes a good faith effort to assist the child to achieve the goals and objectives or benchmarks listed in the IEP.</li> <li>The district provides all programs and services without expense to the child's parents.</li> <li>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.</li> </ol>		
	State Regulations 28.06(3)	Federal Requirements 300.142; 300.350	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

In the review of student records and in interviews with staff and administrators, the onsite team found that at the Champion Charter School services described in student's IEPs have not been implemented at the school from its opening until the current (2003-04) school year. A special education teacher and assistant are now on staff.

CRITERION NUMBER	
	<b>Legal Standard</b>
SE 37	<p><b>Procedures for approved and unapproved out-of-district placements</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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).</li> <li>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.</li> <li>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"> <li>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.</li> <li>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</li> </ol> </li> </ol>



CRITERION NUMBER	
	<b>Legal Standard</b>
	<p>program. Such evaluation determines whether the unapproved facility can appropriately 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 style="text-align: center;"><b>State Regulations</b> <span style="float: right;"><b>Federal Requirements</b></span></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	28.02(13), 28.06(3) <span style="float: right;">300.2(c)</span>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Record review and interviews indicated that documentation of monitoring plans and all actual monitoring are not included in the files of eligible students who are placed out-of-district.

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

Pursuant to the terms of the school’s charter, this criteria does not apply to Champion Charter School.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 38</b>	<p><b>Educational services in institutional settings (ESIS)</b>  <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.  <u>School district responsibility:</u></p> <ol style="list-style-type: none"> <li>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.</li> <li>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).</li> <li>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.</li> </ol> <p><b>State Regulations</b> <span style="float: right;"><b>Federal Requirements</b></span></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	28.06(9)

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 39</b>	<p><b>Procedures used to provide services to eligible students enrolled in private schools at private expense</b></p> <ol style="list-style-type: none"> <li>1. On or before December 1, the district determines the number of eligible private school students in consultation with private school representatives.</li> <li>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: <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol> </li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<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>5. An expedited special education evaluation, which is limited to a child's physician statement unless there is a clear indication of the need or unless the parents request additional evaluation, is conducted and service provided to eligible students by the district within 15 calendar days of the school district's receipt of the child's physician statement.</p> <p><b>State Regulations</b> 28.03(1)(e); Chapter 71B, section 2</p> <p><b>Federal Requirements</b> 34 CFR 300.450-300.462</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

Pursuant to the terms of the school's charter, this criterion does not apply to the Champion Charter School.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 40</b>	<p><b>Instructional grouping requirements for students aged five and older</b></p> <p>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.</p> <p>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.</p> <p>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</p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>sixteen (16) students if the certified special educator is assisted by two aides.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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> <p><b>State Regulations</b> 28.06(6)</p> <p style="text-align: right;"><b>Federal Requirements</b></p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

In the high school some study labs did not have appropriate instructional grouping requirements.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 41</b>	<p><b>Age span requirements</b> 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</p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	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.  <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <b>State Regulations</b> 28.06(6)(f) </div> <div style="width: 45%;"> <b>Federal Requirements</b> </div> </div>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 42</b>	<p><b>Programs for young children three and four years of age</b></p> <p><u>General requirements:</u></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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).</li> </ol> <p><u>Types of Settings:</u></p> <ol style="list-style-type: none"> <li>6. <u>Inclusionary programs</u> for young children are located in a setting that includes children with and without disabilities and meet the following standards:</li> </ol>



	<b>Legal Standard</b>
<b>MOA 8</b>	<p><b>Accessibility of extracurricular activities</b>            Extracurricular activities sponsored by the district are nondiscriminatory in that:</p> <ol style="list-style-type: none"> <li>1. the school provides equal opportunity for all students to participate in intramural and interscholastic sports;</li> <li>2. extracurricular activities or clubs sponsored by the school do not exclude students on the basis of race, sex, color, religion, national origin, sexual orientation, disability, or homelessness.</li> </ol> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a), (b); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.41; Section 504: 29 U.S.C. 794; 34 CFR 104.4, 104.37(a), (c); Title II: 42 U.S.C. 12132; 28 CFR 35.130; NCLB: Title X, Part C, Sec. 721; Mass. Const. amend. art 114; M.G.L. c. 76, s. 5; 603 CMR 26.06</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>
<b>MOA 9</b>	<p><b>Hiring and employment practices of prospective employers of students</b></p> <ol style="list-style-type: none"> <li>1. The district requires employers recruiting at the school to sign a statement that the employer complies with applicable federal and state laws prohibiting discrimination in hiring or employment practices.</li> <li>2. Prospective employers to whom this criterion applies include those participating in career days and work-study and apprenticeship training programs, as well as those offering cooperative work experience.</li> </ol> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(b)(1),(2); Title IX: 20 U.S.C. 1681; 34 CFR 106.38; Section 504: 29 U.S.C. 794; 34 CFR 104.4(b)(1)(v), 104.37(a); Title II: 42 U.S.C. 12132; 28 CFR 35.130(b)(1)(v); M.G.L. c. 76, s. 5; 603 CMR 26.07(5)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------



Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

Pursuant to the terms of the school’s charter, this criterion does not apply to the Champion Charter School because the school does not participate in offering work-study or cooperative work experience.

<b>CRITERION NUMBER</b>	<b>TITLE 1 IV. CURRICULUM AND INSTRUCTION</b>		
	<b>Legal Standard</b>		
<b>TI 24 - TAS</b>	The district implements effective instructional strategies that are based on scientifically-based research that: <ol style="list-style-type: none"> <li>a. give primary consideration to extended learning time;</li> <li>b. help provide an accelerated, high quality curriculum; and</li> <li>c. minimize the removal of students from the classroom during regular hours.</li> </ol> 1115(c)(1)(C) NCLB		

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not a Targeted Assistance School.

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>TI 25 – TAS/SWP</b>	The school district provides opportunities for students receiving Title I services to participate in extended day/week/year programs and activities that the district offers.  1114(b)(1)(B)(ii)(II); 1115(c)(1)(C)(i) NCLB		

Brockton	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE</b>	<b>No</b>
----------	----------------------------	--------------------------	-----------

Public Schools		<b>REQUIRED:</b>	
----------------	--	------------------	--

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 26 - SWP</b>	<p>A comprehensive Schoolwide Program (SWP) plan has been developed with the involvement of the community, those served by the program, and the individuals who will implement the plan, including:</p> <ul style="list-style-type: none"> <li>a. teachers, principals, and other staff, and where appropriate,</li> <li>b. pupil services personnel,</li> <li>c. parents, and</li> <li>d. secondary school students, if applicable.</li> </ul> <p>1114(b)(2)(B)(ii) NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Document review and interviews indicate that the development of the Schoolwide Plan occurred without the involvement of parents and the community and does not address all the required components.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 27 - SWP</b>	The SWP plan includes a comprehensive needs assessment of the entire school that is based upon information on the performance of students in relation to the state academic content standards.  1114(b)(1)(A) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 28- SWP</b>	In providing technical assistance and support to schoolwide programs, the district ensures that the programs and plans contain all ten required schoolwide components, and are designed to ensure that each school will make Adequate Yearly Progress (AYP).  1112(c)(1)(C); 1114(b)(1) and (2) NCLB

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Review and records indicated that the required school wide component of providing “transitional services” to students is not implemented in all schools. Interviews with paraprofessionals indicate that they did not participate in professional development activities/workshops during the academic year 2001-02.

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Document review and interviews indicate that the Schoolwide Plan does not contain all ten required components.

<b>CRITERION NUMBER</b>	<b>SAFE AND DRUG FREE SCHOOLS IV. CURRICULUM AND INSTRUCTION</b>		
	<b>Legal Standard</b>		
<b>SDF 4</b>	Local SDFSCA activities (where applicable) are integrated with the following federal programs under No Child Left Behind (NCLB): <ul style="list-style-type: none"> <li>• Title I (helping disadvantaged children meet high standards);</li> <li>• Title II (professional development);</li> <li>• Title IV B 21<sup>st</sup> Century Learning Center programs</li> <li>• Title V (innovative education program strategies);</li> </ul> [Title IV Sec. 4114 (d) (2) (A)]		
Brockton Public Schools	<b>Rating: Commendable</b>	<b>District Response Required:</b>	<b>No</b>

**Department of Education Findings:**

There is evidence, based on documentation and interviews, that the Director of Health and the SDFCA Coordinator meet minimally once a month with the Directors of Special Education, Title I, Bilingual Education, Guidance, Early Childhood, Senior Director of Curriculum and Senior Director of K-8 Education to address their specific needs and collaborate in the development and implementation of all programs and activities for Brockton students, staff and parents. One such initiative is the collaboration of the SDFSCA Coordinator and the Early Childhood Director in being awarded a competitive grant (the Early Childhood Mental Health Project) for \$65,000. This funding will support the expansion of the Second Step violence prevention program at the early learning center with a significant parent component and professional development for teachers.

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION IV. CURRICULUM AND INSTRUCTION</b>		
	<b>Legal Standard</b>		
<b>CTE 9</b>	Strategies to improve academic success for all students exist. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)</i>		

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION IV. CURRICULUM AND INSTRUCTION</b>		
	<b>Legal Standard</b>		
Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>

**Department of Education Findings:**

Although Brockton has posted literacy indicators in every classroom, it does not require all students to attain a basic level of computer literacy. In addition, integration of occupational and technical course topics into academics is sporadic and should be done much more frequently.

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>CTE 10</b>	Strategies to improve career and technical skills of all students exist. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)</i>		
Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>

**Department of Education Findings:**

Courses have been aligned with appropriate frameworks, and students in these courses are offered extra help. All students are trained in the use and application of computers. Academics topics are well integrated into career and technical courses.

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>CTE 11</b>	(a) Technology is used to improve academic education.  (b) Technology is used to improve career and technical education. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)</i>		
Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>

**Department of Education Findings:**

**a) Technology is used to improve academic education.**

*Partially implemented.*

Students are not assessed as to their level of computer literacy and the school does not

require computer application software.

- b) **Technology is used to improve career and technical education.** *Commendable.* The CTE portion of the school uses computers, computer applications, and the latest in technical machinery in order to train students.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>CTE 12</b>	Linkages between secondary and postsecondary programs exist and are accessible to all students. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4)</i>
Brockton Public Schools	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

Tech Prep is very active at Brockton High School and articulation agreements are in place. Students are told about Tech Prep and other post-secondary educational opportunities in the eighth grade.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>CTE 13</b>	All students are provided with strong experience in and an understanding of all aspects of a modern industry. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4) (7)</i>
Brockton Public Schools	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

Classes are designed to expose and train students in all aspects of modern industry. About 80 students are in various white collar, “pink” collar, and Co-Op internship positions using the work-based learning model. (Co-Op is a very small program, as it does not allow enrollment of students until Senior year.) Both programs’ sites are reviewed and monitored to ensure experience in and understanding of all aspects of the industry.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>CTE 14</b>	Instructional supplies and equipment meet the demands of the workforce. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (3) (4)</i>
Brockton Public Schools	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

Advisory committees review program supplies and equipment regularly to ensure that these items are up-to-date.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>CTE 15</b>	The Perkins Act required 15% minimum expenditure is being expended for activities consistent with the priorities of the Massachusetts State Plan for Professional Development. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.12</i>
Brockton Public Schools	<b>Rating: Implemented</b> <span style="float: right;"><b>District Response Required: No</b></span>

**Department of Education Findings:**

The school offers appropriate coursework through University of Massachusetts at Boston. According to school department policy, all staff must pay \$250 to participate in coursework, however. This could act as a deterrent to Professional Development and should be waived for CTE staff wishing to enroll in Perkins-funded activities.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>CTE 16</b>	Individuals who are members of special populations {that includes individuals with disabilities; individuals from economically disadvantaged families, including foster children; individuals preparing for nontraditional by gender training and employment; single parents, including single pregnant women; displaced

CRITERION NUMBER			
	<b>Legal Standard</b>		
	<p>homemakers; and 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.</p> <p><i>Perkins Section 122, Chapter 76, section 5 [Chapter 622], Title IX; M.G.L. c.74 603 CMR 4.03 (4)(6)(7)</i></p>		
Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>

**Department of Education Findings:**

The Brockton CTE program is in the process of revising its admissions policy to be in compliance with DOE standards. It must also develop a policy stating the conditions for student expulsion, to be inserted in the student manual. Even though the standard was met, the Department of Education would like a school response in order to see the revision of the school policy document.

CRITERION NUMBER	<b>ENGLISH LEARNER EDUCATION IV. CURRICULUM AND INSTRUCTION</b>		
	<b>Legal Standard</b>		
<b>ELE 8</b>	<p><b>Declining Entry to a Program</b></p> <p>The district provides English language support to students whose parents have declined entry to a sheltered English immersion, two-way bilingual, or other ELE program. (See Implementation Guidance below.)</p> <p><b>Authority: Title VI</b></p>		
Brockton Public Schools	<b>Rating: Not Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>

**Department of Education Findings:**

Reviews of student records and interviews with staff indicate that students whose parents have declined entry to programs do not receive language support. Department of Education regulatory guidance indicates that students declining services should be placed in general education classrooms in which the teachers have undergone training in second language acquisition techniques to ensure students' meaningful access to the educational program.



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>ELE 9</b>	<p><b>Instructional Grouping</b></p> <ol style="list-style-type: none"> <li>1. The district only groups students of different ages together in instructional settings if their levels of English proficiency are similar.</li> <li>2. The district’s grouping of students ensures that LEP students receive effective content instruction at appropriate academic levels.</li> </ol> <p><b>Authority: G.L. c. 71A, § 4; Title VI</b></p>
Brockton Public Schools	<p><b>Rating: Implemented</b></p> <p style="text-align: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>ELE 10</b>	<p><b>Parental Notification</b></p> <ol style="list-style-type: none"> <li>1. Upon placement in the ELE program, a notice is mailed to the parents or guardians written in the primary/home language, as well as in English, that informs parents of: <ol style="list-style-type: none"> <li>a. the reasons for identification of the student as Limited English Proficient (LEP);</li> <li>b. the child’s level of English proficiency;</li> <li>c. program placement and/or the method of instruction used in the program;</li> <li>d. how the program will meet the educational strengths and needs of the student;</li> <li>e. how the program will specifically help the child learn English;</li> <li>f. the specific exit requirements; and</li> <li>g. the parents’ right to apply for a waiver (see ELE 4), or to decline to enroll their child in the program (see ELE 9).</li> </ol> <p>(All districts need to comply with a-c and g. Title III districts must comply with a-g. Title III districts must send parental notification no later than 30 days after the beginning of the school year.)</p> </li> <li>2. The district will provide to parents and guardians of LEP students, report cards, and progress reports in the same manner and with the same frequency as general education reporting. The reports shall, to the maximum extent possible, be written in a language understandable to the parent/guardian.</li> </ol> <p style="text-align: center;"><b>Authority: NCLB, Title III; c.71A, §7; 603 CMR 14.02</b></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
Brockton Public Schools	<b>Rating: Commendable</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

The district has an impressive array of placement notification letters, report cards, notices of school events, progress reports, home language surveys, and special education documents translated into all of the major native languages represented in the district. In addition, the district ensures that interpreters are present at all meetings in which the parents may not be fluent in English. Parent liaisons contact parents of limited English proficient students to facilitate involvement in school activities. The district has made their resources available to other districts who may be struggling with the implications of a rapidly emerging limited English proficient student population and can serve as a model for making these documents available to parents.

## 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 29)
- Career and Technical Education (Report Issues # CTE 17-18)
- English Learner Education (Report Issues # ELE 11-13)

<b>CRITERION NUMBER</b>	<b>SPECIAL EDUCATION V. STUDENT SUPPORT SERVICES</b>		
	<b>Legal Standard</b>		
<b>SE 43</b>	<b>Behavioral interventions</b> 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.		
	<b>State Regulations</b>	<b>Federal Requirements</b> 300.346	

Brockton Public Schools	<b>Rating: Commendable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

The district makes a tremendous effort in working with students whose behavior impedes their learning. The district works closely with Dr. Putnam in addressing the needs of students in the Ithaca program. The staff is trained to collect data, interpret the data and use that information to appropriately help students be more successful in their learning.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>SE 44</b>	<b>Procedure for recording suspensions</b> 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).		
	<b>State Regulations</b>	<b>Federal Requirements</b> 300.121(d)(2)	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	----------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School has recently developed a suspension log for special education students; however, this requirement had not been implemented previously. Permanent implementation of the new practice is necessary and will bring the school into full compliance.

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>	
<b>SE 45</b>	<p><b>Procedures for suspension up to 10 days and after 10 days: General requirements</b></p> <ol style="list-style-type: none"> <li>1. All students, including eligible students with disabilities, receive prior written notice regarding the school's Code of Conduct.</li> <li>2. The school's Code of Conduct includes required procedural safeguards such as opportunity for a hearing (per Goss v. Lopez).</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulation</b> MGL c. 76, sec. 16-18 Chapter 71, section 37 H</p> <p><b>Federal Requirements</b> 300.519-300.529</p>	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	----------------------------	------------------------------------	------------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 46</b>	<p><b>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</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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"> <li>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;</li> <li>b. to identify appropriate alternative educational setting(s); and</li> <li>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? Can student control behavior?).</li> </ol> </li> <li>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 that may be in some other setting.</li> <li>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"> <li>a. if the behavior involves weapons or illegal drugs or another controlled substance while at school or a school function; or</li> <li>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</li> <li>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.</li> </ol> </li> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> <span style="float: right;"><b>Federal Requirements</b></span>  <span style="float: right;">300.519-300.528</span></p>



Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	----------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School has recently developed procedures in this area, however, this requirement had not been implemented previously. Permanent implementation of the new practice is necessary, and will bring the school into full compliance.

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>	
<b>SE 48</b>	<p><b>FAPE (Free, appropriate, public education): Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education</b></p> <p>All students receiving special education, regardless of placement, shall have an equal opportunity to participate in and, if appropriate, receive credit for the vocational, supportive, or remedial services that may be available as part of the general education program as well as the non-academic and extracurricular programs of the school.</p> <p>Programs, services and activities include, but are not limited to:</p> <ol style="list-style-type: none"> <li>1. art and music</li> <li>2. vocational education, industrial arts, and consumer and homemaking education</li> <li>3. work study and employment opportunities</li> <li>4. counseling services available at all levels in the district</li> <li>5. health services</li> <li>6. transportation</li> <li>7. recess and physical education, including adapted physical education</li> <li>8. athletics and recreational activities</li> <li>9. school-sponsored groups or clubs</li> <li>10. meals</li> </ol> <p><b>State Regulations</b> 28.06(5)</p> <p><b>Federal Requirements</b> 300.121; 300.300-313</p>	

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------





<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>SE 49A</b>	<p data-bbox="407 380 699 411"><b>Special Transportation</b></p> <p data-bbox="407 447 1305 533">If the IEP specifies that the student’s disability requires transportation or specialized transportation arrangements in order to benefit from special education, the district implements these provisions of the student’s IEP.</p> <ol data-bbox="407 539 1406 1205" style="list-style-type: none"> <li>1. The Team determines necessary modifications, special equipment, assistance, need for qualified attendants on vehicles, and any particular precautions required by the student and documents such determinations in the student's IEP. If specialized arrangements can be provided on regular transportation vehicles, the school district makes such arrangements.</li> <li>2. The district arranges to have eligible students who use wheelchairs transported in vehicles that do not require such children to be removed from their wheelchairs in order to enter or leave the vehicles; provided, however, that this requirement is not applicable where a Team or the student’s physician recommends that the student regularly transfer in and out of conventional vehicles to or from a wheelchair for therapeutic or for independence training reasons.</li> <li>3. The Team specifies whether the student requires assistance in or out of the home, on or off of the vehicle, and in or out of the school. If such assistance is specified, the district ensures that it is provided.</li> <li>4. The Team specifies if the student has a particular need or problem that may cause difficulties during transportation, such as seizures, a tendency for motion sickness, behavioral concerns, or communication disabilities.</li> <li>5. The school district does not allow transportation considerations to influence, modify, or determine the educational program, including the length of the school day, required by any student.</li> </ol> <p data-bbox="407 1241 626 1302"><b>State Regulations</b> 28.05(5)(b)</p> <p data-bbox="883 1241 1162 1272" style="text-align: right;"><b>Federal Requirements</b></p>		

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------------	----------------------------	--	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------------	-------------------------------	--	-----------

**Department of Education Findings:**

This criterion is not applicable to the Champion Charter School.

CRITERION NUMBER	CIVIL RIGHTS METHODS OF ADMINISTRATION V. STUDENT SUPPORT SERVICES
	Legal Standard
MOA 10A	<p><b>Handbooks and codes of conduct</b></p> <ol style="list-style-type: none"> <li>1. The district has a code of conduct for students and one for teachers. The principal of every school containing grades 9-12 prepares, in consultation with the school council, a student handbook containing the student code of conduct and distributes it to each student annually, as well as to parents and school personnel; the school council reviews and revises the student code of conduct every year. The principal of every school containing other grades distributes the district's student code of conduct to students, parents, and personnel annually. At the request of a parent or student whose primary language is not English, a handbook or student code of conduct is translated into that language.</li> <li>2. Student codes of conduct contain: <ol style="list-style-type: none"> <li>a) procedures assuring due process in disciplinary proceedings and</li> <li>b) appropriate procedures for the discipline of students with special needs and students with Section 504 Accommodation Plans.</li> </ol> </li> <li>3. Handbooks and codes of conduct reference M.G.L. c. 76, s. 5 and contain: <ol style="list-style-type: none"> <li>a) a nondiscrimination policy that is consistent with M.G.L. c. 76, s. 5, and affirms the school's non-tolerance for harassment or discrimination, including that based on race, color, national origin, sex, religion, or sexual orientation;</li> <li>b) the school's procedure for accepting, investigating and resolving complaints alleging discrimination or harassment; and</li> <li>c) the disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred.</li> </ol> </li> </ol> <p>Section 504; M.G.L. c. 71, s. 37H; 603 CMR 26.08</p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

The district's handbook is missing appropriate procedures for the discipline of students with special needs and students with Section 504 Accommodation Plans. Additionally the district needs to have one consistent non-discrimination policy that encompasses all of the required elements and weed out older forms that are still being sent out from the district.

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School's student handbook does not contain procedures for the

discipline of students with special needs and students with Section 504 Accommodation Plans. The handbook only refers the reader to the Brockton Public Schools Procedure Manual. The handbook only describes how to report harassment. It does not contain procedures to investigate and resolve complaints alleging discrimination or harassment or the disciplinary measures that it may impose.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 11A</b>	<p><b>Designation of liaison/coordinator(s); grievance procedures</b></p> <ol style="list-style-type: none"> <li>1. The district has designated one or more staff persons to serve as liaison for homeless students and to serve as coordinator for compliance with its responsibilities under Title IX, Section 504, and (if it employs 50 or more persons) Title II.</li> <li>2. The district has adopted and published grievance procedures for students and for employees providing for prompt and equitable resolution of complaints alleging discrimination based on sex or disability.</li> </ol> <p>Title IX: 20 U.S.C. 1681; 34 CFR 106.8; Section 504: 29 U.S.C. 794; 34 CFR 104.7; Title II: 42 U.S.C. 12132; 28 CFR 35.107; NCLB: Title X, Part C, Sec. 722(g)(1)(J)(ii)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:** Champion Charter School does not have in place clear procedures covering the filing and resolution of complaints regarding harassment and/or discrimination, particularly as it relates to off site work situations.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 12A</b>	<p><b>Annual and continuous notification concerning nondiscrimination and coordinators</b></p> <ol style="list-style-type: none"> <li>1. If the district offers vocational education programs, it advises students, parents, employees and the general public before the beginning of each school year that all vocational opportunities will be offered regardless of race, color, national</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>origin, sex or disability. The notice includes a brief summary of program offerings and admission criteria and the name(s), office address(es), and phone number(s) of the person(s) designated under MOA 11A to coordinate compliance under Title IX and Section 504.</p> <p>2. In all cases, the district takes continuing steps to notify applicants, students, parents, and employees (including those with impaired vision or hearing), as well as unions or professional organizations holding collective bargaining or professional agreements with the district, that it does not discriminate on the basis of race, color, national origin, sex, or disability. This notice, also, includes the name(s), office address(es), and phone number(s) of the person(s) designated under MOA 11A to coordinate compliance under Title IX and Section 504.</p> <p>3. Written materials and other media used to publicize a school include a notice that the school does not discriminate on the basis of race, color, national origin, sex, disability, religion, or sexual orientation.</p> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.6(d); Title IX: 20 U.S.C. 1681; 34 CFR 106.8(a), 106.9; Section 504: 29 U.S.C. 794; 34 CFR 104.8; M.G.L. c. 76, s. 5; 603 CMR 26.02(2)</p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

The notice regarding non-discrimination policy needs to be consistent throughout the district and contain all required elements. Older notices need to be excised so personnel are still not using them.

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

In interviews with staff and administrators, the onsite team determined that at the Champion Charter School, staff are not generally aware of their rights and responsibilities in regard to harassment and discrimination claims which might be made by themselves or reported to them by others, including students.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 13</b>	<p><b>Availability of information and counseling on general curricular and occupational/vocational opportunities</b>  Students from linguistic, racial, and ethnic minorities; males; females; homeless students; and students with disabilities all receive, in grades 7-12, the same information and counseling as other students on the full range of general curricular and any occupational/vocational opportunities available to them.</p> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a), (b); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.36; Section 504: 29 U.S.C. 794; 34 CFR 104.4, 104.37(b); Title II: 42 U.S.C. 12132; 28 CFR 35.130; NCLB: Title III, Part A, Sec. 3121(c)(1)(C); Title X, Part C, Sec. 721; Mass. Const. amend. art. 114; M.G.L. c. 71A, s. 7; c. 76, s. 5; 603 CMR 26.03</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 14</b>	<p><b>Counseling and counseling materials free from bias and stereotypes</b>  To ensure that counseling and counseling materials are free from bias and stereotypes on the basis of race, color, sex, religion, national origin, sexual orientation, disability, and homelessness, all counselors:</p> <ol style="list-style-type: none"> <li>1. encourage students to consider programs of study, courses, extracurricular activities, and occupational opportunities on the basis of individual interests, abilities, and skills;</li> <li>2. examine testing materials for bias and counteract any found bias when administering tests and interpreting test results;</li> <li>3. communicate effectively with limited-English-proficient and disabled students and facilitate their access to all programs and services offered by the district;</li> <li>4. provide limited-English-proficient students with the opportunity to receive counseling in their primary language;</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>5. support students in educational and occupational pursuits that are nontraditional for their gender.</p> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a), (b); EEOA: 20 U.S.C. 1703(f); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.36; Section 504: 29 U.S.C. 794; 34 CFR 104.4, 104.37; Title II: 42 U.S.C. 12132; 28 CFR 35.130, 35.160; NCLB: Title III, Part A, Sec. 3121(c)(1)(C); Title X, Part C, Sec. 721; Mass. Const. amend. art. 114; M.G.L. c. 71A, s. 7; c. 76, s. 5; 603 CMR 26.04, 26.07(8)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 15</b>	<p><b>Non-discriminatory administration of scholarships, prizes and awards</b> Scholarships, prizes and awards sponsored or administered by the district are free of restrictions based upon race, color, sex, religion, national origin, sexual orientation or disability. Schools may post or print information regarding private restricted scholarships as long as no preferential treatment is given to any particular scholarship offered and as long as the school does not endorse or recommend any such scholarship nor advise or suggest to a particular student that he or she apply for such a scholarship. Title VI: 42 U.S.C. 2000d; 34 CFR 100.3; Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.37; Section 504: 29 U.S.C. 794; 34 CFR 104.4(b)(1)(v); Title II: 42 U.S.C. 12132; 28 CFR 35.130(b)(1)(v); Mass. Const. amend. art. 114; M.G.L. c. 76, s. 5; 603 CMR 26.07(7)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

CRITERION NUMBER	
	<b>Legal Standard</b>
MOA 16	<p><b>Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion</b></p> <p>1. Within ten days from a student’s fifteenth consecutive unexcused absence, the school provides written notice to students age 16 or over and their parents or guardians. The notice is in English and the family’s native language and states that the student and the parent or guardian may meet with a representative of the district within ten days from the date the notice was sent. At the request of the parent or guardian, the district may consent to an extension of the time for the meeting of not longer than fourteen days.</p> <p>2. At the meeting the participants discuss the reasons that the student is leaving school and alternative educational or other placements. The student and parent or guardian are told that attendance is voluntary after the student turns 16 but are also informed of the student’s right to return to school.</p> <p>M.G.L. c. 76, ss. 5, 18; St. 1965, c. 741</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

Champion Charter School has not implemented the notice requirements of this criterion.

CRITERION NUMBER	
	<b>Legal Standard</b>
MOA 17A	<p><b>Use of physical restraint on any student enrolled in a publicly-funded education program</b></p> <p>1. The district has developed and implemented staff training at least annually on the use of restraint consistent with regulatory requirements. Such training occurs within the first month of each school year and, for employees hired after the school year begins, within a month of their employment.</p>



CRITERION NUMBER	
	<b>Legal Standard</b>
	<p>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.</p> <p>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.</p> <p>4. The district has developed and implemented reporting requirements and procedures for administrators, parents and the Department of Education consistent with the regulations.</p> <p>5. The district has developed and implemented any applicable individual waiver procedures consistent with the regulations.</p> <p>M.G.L. c. 71, s. 37G; 603 CMR 46.00</p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Interviews indicate that not all staff had been to a staff training annually on the use of restraints consistent with regulatory requirements. Yet at both the Phoenix and Ithaca programs interviews indicated that all staff had been trained annually.

Champion Charter School	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School has not implemented the required training.

CRITERION NUMBER	TITLE 1 V. STUDENT SUPPORT SERVICES
	<b>Legal Standard</b>
<b>TI 29</b>	<ol style="list-style-type: none"> <li>1. Appropriate officials from private schools are informed and consulted about the availability of Title I services.</li> <li>2. Written affirmation is obtained and signed by officials of each participating private school, confirming that required consultation has occurred.</li> <li>3. Appropriate officials from Neglected or Delinquent (N or D) facilities are informed and consulted about the availability of Title I services. A contract exists between the district and the N or D facility, if applicable.</li> </ol> <p>1120 NCLB</p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Interviews with program administrator of the Greentree Girls School indicate that there is no coordination/ consultation between the services funded by Title I and the school district.

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

Charter Schools are not required to meet obligations associated with serving students in private schools.

CRITERION NUMBER	CAREER AND TECHNICAL EDUCATION		
	<b>Legal Standard</b>		
<b>CTE 17</b>	<p>Programs and services exist that support student participation in and completion of nontraditional by gender training and employment activities.</p> <p><i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4) (7)</i></p>		
Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>CTE 18</b>	The needs of students in alternative education programs are adequately addressed. <i>Perkins Sec. 135; M.G.L. c.74 603 CMR 4.03 (4) (7)</i>		
Brockton Public Schools	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><b>Rating: Not Implemented</b></td> <td style="width: 50%; text-align: right;"><b>DISTRICT RESPONSE REQUIRED: Yes</b></td> </tr> </table>	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED: Yes</b>
<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED: Yes</b>		

**Department of Education Findings:**

The Brockton program does not allow alternative high school students access to CTE programs as these students are prohibited from entering high school grounds. They can return to the high school, but many would miss significant time in activity in vocational programs. The school system may have to identify some kind of parallel program or accommodation in order to be in compliance with this standard.

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION V. STUDENT SUPPORT SERVICES</b>
	<b>Legal Standard</b>
<b>ELE 11</b>	<p><b>Equal Access to Academic Programs and Services</b></p> <ol style="list-style-type: none"> <li>1. Districts shall not segregate LEP students from their English-speaking peers, except when necessary, to implement a language support program.</li> <li>2. The district ensures that LEP students participate fully with their English-speaking peers and are provided support in non-core regular public school courses.</li> <li>3. The district ensures that LEP students have the opportunity to receive academic support services, such as guidance and counseling, in the student's primary language.</li> <li>4. The district ensures that LEP students are taught to the same academic standards and curriculum frameworks as all students, and provides the same opportunities to master such standards and frameworks as other students.</li> <li>5. The district uses content objectives that are based on the Massachusetts curriculum frameworks in English language arts, history and social science, mathematics, and science and technology/engineering. Language objectives are based on the Massachusetts English language arts standards, and those standards contained in the Massachusetts English Language Proficiency Benchmarks and Outcomes.</li> </ol> <p><b>Authority: Title VI; c71A, §7; 603 CMR 26.07 (8)</b></p>

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION V. STUDENT SUPPORT SERVICES</b>		
	<b>Legal Standard</b>		
Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>

**Department of Education Findings:**

The district has very effectively implemented instructional programs that adhere to the Massachusetts Curriculum Frameworks, the English Learner Benchmarks and Outcomes, and provide most ELE students at the elementary level with a wide range of academic opportunity. However, implementation of requirements under this criterion fall short in a few key areas in the middle and secondary grades. Some ELE teachers reported a lack of content training and teaching materials, essential to providing sheltered English instruction, and an inability to attend common planning meetings. Interviews with staff also indicated that some ELE students do not have access to computer and health education, and that reading instruction resources are insufficient for students who come to the district with little formal education in their native countries. The Department recommends the establishment of a literacy program to address the severe literacy deficits of these students.

The district has a wide range of supports for ELE students who struggle to achieve, including access to after school programs, MCAS support classes, and Title I instructors. However, staff interviews indicate the belief that English learners are under-identified for special education because building support teams are hesitant to attribute learning difficulties to causes other than lack of English proficiency. There is no clear procedure in place for assessing and educating students who do not speak English, and interviews indicated that qualified assessors of limited English proficient students are not readily available.

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>ELE 12</b>	<b>Equal Access to Nonacademic and Extracurricular Programs</b> The district provides appropriate support, where necessary, to limited English proficient students to ensure that they have equal access to the nonacademic programs and extracurricular activities available to their English-speaking peers.  <b>Authority: Title VI; 603 CMR 26.06 (2)</b>		
Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>

<b>CRITERION NUMBER</b>		
	<b>Legal Standard</b>	
<b>ELE 13</b>	<p><b>Follow-up Support</b></p> <ol style="list-style-type: none"> <li>1. The district monitors students who have exited an English learner education program and provides language support services to those students, if needed.</li> <li>2. To the extent possible, the district provides access to adult basic education in English language and literacy skill instruction for LEP students who were previously enrolled in a public secondary school in the Commonwealth directly from a country other than the United States and who were unable to achieve English language proficiency as determined by assessments.</li> </ol> <p><b>Authority: Title VI; Chapter 218 of the Acts of 2002</b></p>	
Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>District Response Required: Yes</b>

**Department of Education Findings:**

The district has written policies that describe the availability of follow-up language support. Unfortunately, interviews and student record reviews indicate this policy does not always translate into direct support to students who have exited ELE programs. Student records do not document follow-up activities unless a student has failed MCAS, and in those cases, language support services are not always among the interventions offered.

The district does not currently offer continuing English classes to former students who failed to learn English during the time they were enrolled in the Brockton Public Schools.

## COMPONENT VI: FACULTY, STAFF AND ADMINISTRATION

The criteria in this component examine whether the district has licensed 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. Finally, this component examines whether the district's personnel procedures are non-discriminatory and aimed at recruiting employees from all groups.

:

- Special Education (Report Issues # SE 50-54)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 18A-21)
  - Title I (Report Issues # TI 30-31)
  - Career and Technical Education (Report Issue # CTE 19)
  - English Learner Education (Report Issues 14-15)

CRITERION NUMBER	SPECIAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION
	<b>Legal Standard</b>
SE 50	<p><b>Responsibilities of the School Principal and Administrator of Special Education Principal:</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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</li> </ol>





<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 51</b>	<p><b>Appropriate special education <u>teacher</u> certification</b>  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><b>State Regulations</b>  28.02(3)  603 CMR 7.00</p> <p style="text-align: right;"><b>Federal Requirements</b>  300.23; 300.136</p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Documentation review indicated that out of a very large Special Education staff the district currently employs only five special education teachers or related service providers who are currently not certified/licensed by the Department of Education and/or no evidence was provided that the Department currently waives them.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SE 52</b>	<p><b>Appropriate certifications or other credentials -- <u>related service providers</u></b>  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><b>State Regulations</b>  28.02(3)</p> <p style="text-align: right;"><b>Federal Requirements</b>  300.23; 300.24; 300.136</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>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;</p> <p>5) methods of collaboration among teachers, paraprofessionals and teacher assistants to accommodate diverse learning needs of all students in the regular classroom;</p> <p>6) training in the provision of pre-referral services within regular education, teacher mentoring and collaboration and parental involvement;</p> <p>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</p> <p>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> <p><b>State Regulations</b> Chapter 71, sec. 38g 28.03(1)(a) Chapter 71, sec. 38Q and 38Q ½</p> <p><b>Federal Requirements</b> 300.382</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Staff at the Champion Charter School has not undergone all required training's described above.

<b>CRITERION NUMBER</b>	<b>CIVIL RIGHTS METHODS OF ADMINISTRATION VI. FACULTY, STAFF AND ADMINISTRATION</b>
	<b>Legal Standard</b>
<b>MOA 18A</b>	<p><b>School district employment practices</b> District employment practices in general are free from discrimination on the basis of race, color, national origin, sex, or disability. In particular, the district's faculty salary scales are based on the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability, and the district's employee</p>

<b>CRITERION NUMBER</b>	<b>CIVIL RIGHTS METHODS OF ADMINISTRATION VI. FACULTY, STAFF AND ADMINISTRATION</b>
	<b>Legal Standard</b>
	recruitment is aimed at reaching all groups, including members of linguistic, ethnic, and racial minorities, females and males, and persons with disabilities.  Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(c); EEOA: 20 U.S.C. 1703(d); Title IX: 20 U.S.C. 1681; 34 CFR 106.51-106.61; Section 504: 29 U.S.C. 794; 34 CFR 104.11-104.14; Title II: 42 U.S.C. 12132; 28 CFR 35.140; Mass. Const. amend. art 114

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 19</b> Reserved	

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 20</b> Reserved	

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 21</b>	<b>Staff training regarding civil rights responsibilities</b> 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 students' race, color, sex, religion, national origin and sexual orientation and the appropriate methods for responding to it in the school

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>setting.</p> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3; EEOA: 20 U.S.C. 1703(f); Title IX: 20 U.S.C. 1681; 34 CFR 106.31-106.42; M.G.L. c. 76, s. 5; 603 CMR 26.00, esp. 26.07(2), (3)</p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Interviews indicate that not all staff have received staff training regarding civil rights responsibilities.

Champion Charter School	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

Champion Charter School has not implemented the required training.

<b>CRITERION NUMBER</b>	<b>TITLE 1 VI. FACULTY, STAFF AND ADMINISTRATION</b>
	<b>Legal Standard</b>
<b>TI 30</b>	<ol style="list-style-type: none"> <li>1. All professional staff providing Title I services are appropriately licensed (or hold current licensure waivers) and are highly qualified for their job title and function.</li> <li>2. Where applicable, the district’s Title IIA grant application describes how it will use these funds to meet the requirements of section 1119.</li> </ol> <p><b><u>Implementation Guidance:</u></b></p> <ol style="list-style-type: none"> <li>1. Title I teachers* who teach the core academic subjects are highly qualified by possessing a valid Massachusetts license (preliminary, initial, or professional) and demonstrating subject matter competency in each of the areas that they teach: <ol style="list-style-type: none"> <li>a. Elementary teachers have demonstrated competence in reading, writing, mathematics, and other areas of the basic elementary school curriculum by either passing the Massachusetts Test for Educator Licensure (MTEL) Elementary Subject Matter Test, or completing an approved Individual Professional Development Plan (IPDP) as outlined in the Massachusetts high</li> </ol> </li> </ol>

CRITERION NUMBER	TITLE 1 VI. FACULTY, STAFF AND ADMINISTRATION
	<b>Legal Standard</b>
	<p>objective uniform standard of evaluation.</p> <ul style="list-style-type: none"> <li>b. Middle and secondary teachers have demonstrated subject matter competence in each of the areas they are teaching through one of the following: passing the Massachusetts Test for Educator Licensure (MTEL) appropriate Subject Matter Test; completion of an appropriate academic major; completion of an appropriate graduate degree; completion of comparable coursework equivalent to an undergraduate academic major; advanced certification or credentialing; or completing an approved Individual Professional Development Plan as outlined in the Massachusetts high objective uniform standard of evaluation.</li> <li>c. The above requirements apply to Title I teachers in targeted assistance programs. In schoolwide programs, the above requirements apply to <b>all</b> teachers in the school.</li> </ul> <p>2. All paraprofessional staff providing Title I services must meet the following:</p> <ul style="list-style-type: none"> <li>a. New Hires (hired on or after January 8, 2002): must have completed at least 2 years at an institution of higher education; or obtained an Associate's degree or higher, or met rigorous standard of quality (passed the state-endorsed assessment or local assessment, once available, as outlined in the DOE's policy document);</li> <li>b. Existing paraprofessional staff (hired prior to January 8, 2002): working to satisfy requirements by 2006; and</li> <li>c. All paraprofessional staff: must have earned a secondary high school diploma.</li> <li>d. The above requirements apply to any instructional paraprofessional who is paid for with Title I funds in a targeted assistance program. The above requirements apply to <b>all</b> instructional paraprofessionals in a schoolwide program.</li> <li>e. Exempt from the above requirements are paraprofessionals who serve primarily as translators or work solely on parental involvement activities.</li> </ul> <p>*Non Title I teachers have until the end of the 2005-2006 school year to meet the highly qualified teacher requirements.</p> <p>MGL Chapter 71, 38G 1119(a), (c), (d), and (f) NCLB 2122(b) 10 NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Documentation review indicates not all staff are appropriately licensed or hold current licensure waivers and are highly qualified for their job title and function.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 31</b>	Professional Development 1. The school district uses between 5% and 10% of its Title I funds for professional development activities to ensure that teachers who are not highly qualified, become highly qualified. 2. Title I teachers are involved in the Title IIA professional development needs assessment.  1119(k)(1) NCLB 2122(c)(1)(2) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION</b>
	<b>Legal Standard</b>
<b>CTE 19</b>	All staff in Perkins-eligible programs appropriately approved, licensed or otherwise qualified.

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION</b>	
	<b>Legal Standard</b>	
	<i>M.G.L. c.74 603 CMR 4.00, M.G.L. c.71.s.38G</i>	
Brockton Public Schools	<b>Rating: Commendable</b>	<b>District Response Required: No</b>

**Department of Education Findings:**

Many of the CTE teaching staff have Master’s degrees and are highly qualified.

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION</b>	
	<b>Legal Standard</b>	
<b>ELE 14</b>	<p><b>Licensure and Fluency Requirements</b></p> <ol style="list-style-type: none"> <li>1. The district assures that all teachers in English language classrooms are literate and fluent in English.  A teacher is literate in English if the teacher: <ol style="list-style-type: none"> <li>(a) possesses a teaching license issued pursuant to G.L. c.71, section 38G; or</li> <li>(b) possesses a vocational teacher approval or a vocational technical educator license; or</li> <li>(c) earns a passing score on the Communication and Literacy Skills portion of the Massachusetts Tests for Educator Licensure (MTEL), or</li> <li>(d) possesses a Bachelor’s degree from a college or university where the language of instruction was English.</li> </ol> <p>English fluency may be determined through one or more of the following methods:</p> <ol style="list-style-type: none"> <li>(a) classroom observation and assessment by the teacher’s supervisor, principal, and/or superintendent or charter school leader, or</li> <li>(b) an interview and assessment by the teacher’s supervisor, principal, and/or superintendent or charter school leader, or</li> <li>(c) the teacher’s demonstration of fluency in English, through a test accepted by the Commissioner of Education; or</li> <li>(d) another method determined by the superintendent or charter school leader, and accepted by the Commissioner of Education.</li> </ol> </li> <li>2. Teachers and educational staff who teach in ELE programs hold the appropriate licenses or current waivers issued by the Department of Education.</li> <li>3. If the district has 200 or more LEP students and has a director of programs for LEP students who is employed in that position for one-half time or more, that director is certified in English as a Second Language, or Bilingual Education, or holds a Teacher of English Language Learners (TELL) program license, and an administrator/supervisor license.</li> <li>4. No later than July 2008, the district will have at least one teacher who is certified in English as a Second Language, or Bilingual Education, or Teacher of English Language Learners (TELL).</li> </ol>	



<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION VI. FACULTY, STAFF AND ADMINISTRATION</b>		
	<b>Legal Standard</b>		
	<b>Authority: G.L. c. 71, § 38G; G.L. c. 71A, § 2; Chapter 218 of the Acts of 2002, § 24 and 25; Title VI; 603 CMR 14.05</b>		
Brockton Public Schools	<b>Rating: Implementation in Progress</b>	<b>District Response Required:</b>	<b>Yes</b>

**Department of Education Findings:**

Although ELE program teachers are certified, many ELE students are taught in general education classrooms by teachers who are not ELE certified, have not taken coursework, or have not been provided with professional development in second language acquisition. (For Department of Education licensing guidelines, see <http://www.doe.mass.edu/pqa/review/cpr/instrument/chapter71A.pdf>.)

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>ELE 15</b>	<p><b>Professional Development Requirements</b>  District schools with LEP students implement a professional development plan that provides high quality training in second language acquisition and in working with culturally and linguistically diverse student populations. The school provides opportunities that ensure the progress of LEP students in developing oral comprehension, speaking, reading, and writing of English, and also in meeting academic standards and curriculum frameworks.</p> <p><b>Authority: M.G.L. c71, § 59C; NCLB, Title III</b></p>		
Brockton Public Schools	<b>Rating: Implementation in Progress</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>

**Department of Education Findings:**

A review of district professional development offerings indicate that second language training is currently available to general education teachers who teach ELE students, but is optional. Currently, many teachers who instruct ELE students have elected not to avail themselves of second language acquisition training. Department standards do not make second language acquisition training optional, since it is a prerequisite to teaching ELE students.

## 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)
  - Career and Technical Education (Report Issue # CTE 20)
  - English Learner Education (Report Issue # ELE 16)

CRITERION NUMBER	SPECIAL EDUCATION VII. SCHOOL FACILITIES	
	Legal Standard	
SE 55	<p><b>Special education facilities and classrooms</b></p> <ol style="list-style-type: none"> <li>1. The school district provides facilities and classrooms for eligible students which maximize the inclusion of such students into the life of the school;</li> <li>2. provide accessibility in order to implement fully each child's IEP;</li> <li>3. are at least equal in all physical respects to the average standards of general education facilities and classrooms; and</li> <li>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.</li> </ol> <p><b>State Regulations</b> 28.03(b)</p> <p><b>Federal Requirements</b> Section 504 of the Rehabilitation Act of 1973</p>	

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Facility observations and interviews indicate the following special education facilities and classrooms do not meet the requirements of this criterion:

Downey School: Speech and language services being offered in a closet. Additionally, clustering of Special Education classrooms in the same hallway of the school.

West Jr. High: Special Education class taught in room not equal in size to other classrooms in the building.

East Jr. High: Clustering of three Special Education classes in a row.

Brockton Public High School: Life Skills class was too crowded and noisy. The bathrooms that were provided for students with disabilities did not meet requirements set out with ADA. Particularly in the girl's bathroom, there was not enough room to get a wheelchair into the stall or room to change a student with disabilities. Additionally the lock on the elevator was not secure and this led to it being broken into and open to graffiti.

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

All classroom spaces at the Champion Charter School are small. The room used for the delivery of special education service, however, is overcrowded beyond the average standard present in the regular education program.

<b>CRITERION NUMBER</b>	<b>CIVIL RIGHTS METHODS OF ADMINISTRATION VII. SCHOOL FACILITIES</b>		
	<b>Legal Standard</b>		
<b>MOA 22</b>	<p><b>Accessibility of district programs and services for students with disabilities</b> In at least one facility within the district, the district makes available and entirely accessible to students with disabilities all educational and vocational programs and services offered at each level (preschool, elementary and secondary).</p> <p>Section 504: 29 U.S.C. 794; 34 CFR 104.21,104.22; Title II: 42 U.S.C. 12132; 28 CFR 35.149, 35.150; Mass. Const. amend. art. 114</p>		

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Although there is one facility at each educational level at the district identified as being accessible to students with disabilities, none of these buildings are entirely ADA approved. Each has some problems that have been identified on the ADA checklist that needs to be addressed in order to be in full compliance.

Champion Charter School	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>MOA 23</b>	<p><b>Comparability of facilities</b> Where the district provides separate facilities for members of a specific group, those facilities are comparable to those offered other students in the district, including:</p> <ol style="list-style-type: none"> <li>1. separate facilities for disabled, limited-English-proficient or pregnant students that are comparable to the facilities for other students in the district;</li> <li>2. separate toilet, locker room, and shower facilities for students of one gender that are comparable in size, condition, number and location to those provided students of the other gender.</li> </ol> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(b)(2); Title IX: 20 U.S.C. 1681; 34 CFR 106.33, 106.40(b)(3); Section 504: 29 U.S.C. 794; 34 CFR 104.34(c); Mass. Const. amend. art. 114; 603 CMR 28.03(1)(b)</p>		

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>DISTRICT RESPONSE</b>	<b>Yes</b>
-------------------------	--------------------------------------	--------------------------	------------

Public Schools	<b>REQUIRED:</b>
----------------	------------------

**Department of Education Findings:**

The life skills class at the high school was a separate facility for students with disabilities and it was not comparable to facilities that are offered for other students in the district.

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION VII. SCHOOL FACILITIES</b>		
	<b>Legal Standard</b>		
<b>CTE 20</b>	Instructional facilities meet the demands of the workforce including those for state of the art facilities as well as for a healthy, safe environment. <i>Perkins Sec. 122; 135; M.G.L. c.74 603 CMR 4.03 (3)(7)</i>		
Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>

**Department of Education Findings:**

Some facilities are extraordinarily good. (Tech Lab). Others, although representative of the work force, are a bit congested because of overflow from storage. Because of this, the space looks extremely cluttered and tight. This should be addressed immediately. Overall, though, although small and tight, the space is sufficient for the work being performed. One recommendation would be to clear up space between work areas in Graphics and Carpentry and get more storage area for all programs. In some instances the safety (Panic) buttons did not have clear access to be seen or activated because of obstructions placed in front of the buttons. This must be addressed immediately. There should be a large fluorescent arrows painted on the wall pointing to the panic button's location. Additionally, exit signs within the labs and throughout the building should be printed in a minimum of two languages (English and the language reflecting the second highest school population). All exit signs must be painted in "illuminating" paint to increase their visibility in all lighting situations.

Even though Brockton Public Schools met the legal standard of this requirement the Department of Education would like to see a further response to these issues that were raised above.

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION VII. SCHOOL FACILITIES</b>		
-------------------------	---	--	--

	<b>Legal Standard</b>	
<b>ELE 16</b>	<p><b>Equitable Facilities</b>  The district ensures that LEP students are provided facilities and services comparable to those provided to the overall student population.</p> <p><b>Authority: Title VI; 603 CMR 26.07</b></p>	
Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required: No</b>

## COMPONENT VIII: PROGRAM PLAN AND EVALUATION

The criteria in this component examine whether the district has written program 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 32-38)
  - Safe and Drug Free Schools (Report Issue # SDF 5-8)
  - Career and Technical Education (Report Issue # CTE 21)
  - English Learner Education (Report Issue #17)

CRITERION NUMBER	SPECIAL EDUCATION VIII. PROGRAM PLAN AND EVALUATION		
	Legal Standard		
SE 56	<p><b>Special education programs and services are evaluated</b></p> <ol style="list-style-type: none"> <li>1. Special education programs, services and administrative areas are regularly evaluated.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> Chapter 71B Chapter 71, sec. 59C</p> <p style="text-align: right;"><b>Federal Requirements</b> 300.137</p>		

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------------	----------------------------	------------------------------------	------------

**Department of Education Findings:**

Special education programs and services were regularly evaluated in the district. One program in particular did tremendous work with regards to this criterion and needs to be commended. Through interviews with staff and documentation the Department of Education team was impressed with the use of consultant services provided by Dr. Robert Putnam who worked with the principal and staff to evaluate the effectiveness of Ithaca's school wide behavior management program. Classroom observations, student/teacher input, and meeting with staff were used to investigate the effectiveness of the program. Suspensions, referrals to the office, time on task, time outs and positive reinforcements were reviewed. Recommendations were considered and an action plan was developed for improving outcomes for students. However staff interviews at the early childhood level indicated that an evaluation of the program and services had not been done regularly.

Champion Charter School	<b>Rating: Not Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

Interviews and documentation indicate that not all special education programs and services are regularly evaluated at the Champion Charter School.



<b>CRITERION NUMBER</b>	<b>CIVIL RIGHTS METHODS OF ADMINISTRATION VIII. PROGRAM PLAN AND EVALUATION</b>
	<b>Legal Standard</b>
<b>MOA 24</b>	<p><b>Curriculum review process</b> The district has a process to ensure that teachers in the district regularly review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, religion, national origin and sexual orientation. Appropriate activities, discussions and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in such materials.</p> <p>M.G.L. c. 76, s. 5; 603 CMR 26.05(2)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>MOA 25</b>	<p><b>Institutional self-evaluation</b> The district evaluates all aspects of its K-12 program annually to ensure that all students, regardless of race, color, sex, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. It makes such changes as are indicated by the evaluation.</p> <p>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(b)(2); EEOA: 20 U.S.C. 1703(f); Section 504: 29 U.S.C. 794; 34 CFR 104.4(b)(4); Title II: 42 U.S.C. 12132; 28 CFR 35.130(b)(3); NCLB: Title III, Part A, Sec. 3121(c)(1)(C); Title X, Part C, Sec. 722(g)(1)(J)(i), 722(g)(7); Mass. Const. amend. art. 114; M.G.L. c. 71A, s. 7; c. 76, s. 5; 603 CMR 26.07(1),(4)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

Champion Charter School has not conducted the required self-evaluation.

<b>CRITERION NUMBER</b>	<b>TITLE 1 VIII. PROGRAM PLAN AND EVALUATION</b>
	<b>Legal Standard</b>
<b>TI 32</b>	A needs assessment and a data analysis are conducted annually in each Title I school to determine the types of programs and services to be provided to Title I students. The implemented program is evaluated for effectiveness annually and the resulting program changes are described. Meeting notes, analysis of assessment, and all relevant documents are available.  1114(b)(1)(A); 1115 (c)(2)(B) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Document review and interviews indicate that the school annually surveys staff and reviews student assessments. However, the implemented program is not evaluated on an annual basis.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 33</b>	The adequate yearly progress (AYP) of each Title I school is evaluated in the aggregate and by subgroup, as available, on an annual basis. Title I program changes are implemented that reflect the results of this evaluation.  1114 (b)(2)(B)(iii); 1115 (c)(2)(B); 1116(A)(1)(A) and (B) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 34</b>	Each Title I school identified as “in need of improvement” revises (not later than 3 months after being identified) a two-year school improvement plan in consultation with parents, staff, other district personnel, and outside experts that meets NCLB requirements.  1116(b)(3)(A) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not identified as a school in need of improvement

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 35</b>	For schools that have been identified as “in need of improvement,” school improvement plans must be implemented not later than the beginning of next full school year following this identification.  1116(b)(3)(D)

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not identified as a school in need of improvement.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 36</b>	For any of the district’s Title I schools that have been identified as “in need of improvement,” the school spends at least 10% of its allocation of Title I funds to provide teachers and the school principal with high-quality professional development that directly addresses the problems associated with academic achievement in the school.  1116(b)(3)(A)(iii)(I) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not identified as a school in need of improvement.

<b>CRITERION NUMBER</b>	
<b>Legal Standard</b>	
<b>TI 37</b>	<p>For schools that have been identified as “in need of improvement,” the district provides students enrolled in those schools the choice to transfer to another of the district’s schools not identified as in need of improvement and informs parents of this opportunity. Priority is given to the lowest achieving students from low-income families.</p> <p>1116(b)(1)(E)(i) and (ii) NCLB 2763A-32 of P.L. 106-554 (Education Appropriations Act, 2001)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not identified as a school in need of improvement.

<b>CRITERION NUMBER</b>	
<b>Legal Standard</b>	
<b>TI 38</b>	<p>For schools that continue to fail to make AYP after being identified as “in need of improvement,” the district:</p> <ol style="list-style-type: none"> <li>a. Continues to make the choice to transfer option available to students;</li> <li>b. Begins to make supplemental educational services available; For supplemental services, the district/school notifies parents of eligible students at least annually about the availability of supplemental educational services, objectively determines which students should receive services if all students can not be served, arranges for service to be provided, ensures that students with disabilities and students with limited English proficiency are served appropriately and when requested, assists the Department with monitoring the services provided, and;</li> <li>c. To provide technical assistance to such schools.</li> </ol> <p>1116(b)(5) and 1116 (e) NCLB; 200.46 (4) and (5)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not identified as a school in need of improvement.

<b>CRITERION NUMBER</b>	<b>SAFE AND DRUG FREE SCHOOLS VIII. PROGRAM PLAN AND EVALUATION</b>		
	<b>Legal Standard</b>		
<b>SDF 5</b>	Each recipient bases its programs on a thorough assessment of objective data about the drug and violence problems in the schools and communities served. Each SDFSCA grant recipient conducts a through assessment of the nature and extent of youth drug use and violence problems.  [Title IV Secs. 4111 – 4116]		
Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>

**Department of Education Findings:**

Based on documentation and interviews, there is evidence that Brockton has a well developed process in place to determine the current level of substance abuse and violence amongst the student population in the community. In addition to the Youth Risk Behavior Surveys ( YRBS) funded under other sources, the process includes focus groups in the community conducted by Brockton Neighbors United reaching over 300 adults in the community, focus groups/meetings with parents, community leaders, teachers and advisory council members. Furthermore, school disciplinary records at all levels and nurse’s logs are reviewed and analyzed. Data is collected from local law enforcement agencies, hospitals, health agencies and community agencies. There is appropriate documentation to support the statistics and incident information reported in the objective analysis section of the district’s most recent SDFSCA grant application. Further, there is evidence that the objective analysis is based upon ongoing local assessment of activities and programs.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SDF 6</b>	Each recipient establishes a set of performance measures and designs its programs to meet those measures.  [Title IV Sections 4114, (d) (B) (i) (I) (II) (ii) (C)]
Brockton Public Schools	<b>Rating: Implemented</b> <b>DISTRICT RESPONSE REQUIRED:</b> <b>No</b>

**Department of Education Findings:**

The design of the substance and violence prevention programs and strategies are based on a thorough and well-defined need assessment of the objective data about drug and violence problems among youth in the district. Brockton has established goals, measurable objectives and activities for its prevention programs. These stated goals, objectives and activities address the needs identified by the objective analysis.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SDF 7</b>	Each recipient designs and implements its programs for youth based on research or evaluation that provides evidence that programs used are based on scientifically based research that provides evidence that the program to be used will reduce violence and illegal drug use.  [NCLB, Title IV Section 4115, (a) (C)]
Brockton Public Schools	<b>Rating: Commendable</b> <b>DISTRICT RESPONSE REQUIRED:</b> <b>No</b>

**Department of Education Findings:**

Based on documentation and interviews, selected programs and activities respond to the identified needs. These programs and activities are developed using scientifically based research and evaluation that demonstrate evidence of excellent program effectiveness in reducing and preventing drug use, violence and disruptive behavior among youth. Some of these programs are Second Step, Life Skills Training, Peer Mediation, Growing Healthy, Teenage Health Modules and Project T.N.T. The Second Step has been implemented in most of the elementary and middle schools to great success and there are implementation plans for the remaining schools in the coming year. All students participate in all activities and all programs are adjusted when needed for language minority students and/or students with special needs. There are very clear expectations against violence and illegal use of drugs with appropriate, consistent and well-enforced consequences in place for violations of the policies.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SDF 8</b>	Each recipient shall conduct a periodic evaluation to assess its progress toward reducing violence and illegal drug use in schools to be served based on performance measures.  [NCLB, Title IV Secs. 4115 (2) (A),(B)]
Brockton Public Schools	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

Based on documentation and interviews, the district’s evaluation design includes process, outcome and impact assessment. An evaluation process is employed to measure the district’s progress towards achieving its goals and objectives. The SDFSCA Coordinator with the advisory council, teachers and other program coordinators have developed a very effective assessment to evaluate the effectiveness of the programs. There is documentation that some evaluation results are used to refine, improve and strengthen programs and their implementation. Evaluation results and the goals and objectives of the SDFSCA program are reported publicly in a consistent manner through the year in English as well as several other languages. This information is available and is disseminated via newsletters, local cable, newspapers, School Committee, Advisory Council, Superintendent’s Office, the schools, parents groups, web site, Adult Education Center and the Parents Information Center.

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION VIII. PROGRAM PLAN AND EVALUATION</b>
	<b>Legal Standard</b>
<b>CTE 21</b>	The school has developed and implemented a system of program evaluation that includes, at a minimum, the following four core indicators and program outcomes. <i>Perkins Sec. 116; M.G.L. c.74 603 CMR 4.03 (3)(5)</i>  <i>Perkins Act Core Indicators:</i> (i) Student attainment of challenging State established academic and vocational and technical skill proficiencies; (ii) Student attainment of a secondary school diploma or its recognized equivalent, a proficiency credential in conjunction with a secondary school diploma, or a post secondary degree or credential; (iii) Placement in, retention in, and completion of postsecondary education or advanced training, placement in military service, or placement or retention in employment; and (iv) Student participation in and completion of vocational and technical education programs that lead to nontraditional training and employment. <i>Chapter 74 Outcomes:</i>



<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION VIII. PROGRAM PLAN AND EVALUATION</b>
	<b>Legal Standard</b>
	<ol style="list-style-type: none"> <li>1. Outcome I - Effective with the Class of 2003, the percentage of vocational technical education students who receive a high school diploma.</li> <li>2. Outcome II - Upon the development of the Certificate of Occupational Proficiency (COP) Assessment System, the percentage of vocational technical education students who receive a Certificate of Occupational Proficiency.</li> <li>3. Outcome III - The percentage of vocational technical education program graduates who are in a military program related to their program of study, employed related to their program of study or who are enrolled in postsecondary education or advanced training twelve months after graduation.</li> </ol>
Brockton Public Schools	<b>Rating: Implemented</b> <span style="float: right;"><b>District Response Required: No</b></span>

**Department of Education Findings:**

Brockton CTE did very well in its core indicator performance over the past three years.

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION VIII. PROGRAM PLAN AND EVALUATION</b>
	<b>Legal Standard</b>
<b>ELE 17</b>	<p><b>DOE Data Submission Requirements and Program Evaluation</b></p> <ol style="list-style-type: none"> <li>1. The district reports annually to the Department, the following student information: <ol style="list-style-type: none"> <li>a. the schools in which LEP students are enrolled;</li> <li>b. the grade levels of the students;</li> <li>c. the primary languages of each LEP student; and</li> <li>d. the types of English learner programs in which the district has enrolled LEP students, i.e., whether the programs are sheltered English immersion, two-way bilingual, or another English learner education program.</li> </ol> </li> </ol> <p><b>For Title III districts:</b></p> <ol style="list-style-type: none"> <li>2. The district provides information to the Department that describes: <ol style="list-style-type: none"> <li>e. ELE programs and activities;</li> <li>f. a description of the progress made by students in learning English and academic content;</li> <li>g. the number and percentage of students in the programs attaining English proficiency by the end of the school year; and</li> <li>h. the description of academic progress made by the students.</li> </ol> </li> <li>3. The district conducts periodic evaluations of the effectiveness of its</li> </ol>

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION VIII. PROGRAM PLAN AND EVALUATION</b>
	<b>Legal Standard</b>
	<p>ELE program. The students are showing English language development and the ability to participate meaningfully in the educational program. Where the district documents that the program is not effective, it takes steps to make appropriate program adjustments or changes that are responsive to the outcomes of the program evaluation.</p> <p><b>Authority: M.G.L. c 71A; NCLB, Title III, Title VI; 603 CMR 14.03</b></p>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>District Response Required: Yes</b>
-------------------------------	--------------------------------------	--

**Department of Education Findings:**

The district does appropriately submit data to the Department but does not have a formal process in place for the periodic evaluation of the effectiveness of its ELE program.

## COMPONENT IX: RECORD KEEPING

The criteria in this component examine whether the district maintains required records and documentation for each program area, whether entitlement grants are appropriately designed, amended, and locally monitored, whether the use federal grant funds is in accordance with statutory fund-use rules, including supplement not supplant provisions and maintenance of effort requirements where applicable for the program areas listed below:

- Special Education (Report Issues # SE 57-58)
- Title I (Report Issues # TI 39-40 General Requirements and TI 1-18 Fiscal Requirements)
- Safe and Drug Free Schools (Report Issue # SDF 9-10)
- Career and Technical Education (Report Issue # CTE 22)
- English Learner Education (Report Issue # 18)

CRITERION NUMBER	<b>SPECIAL EDUCATION IX. RECORD KEEPING</b>		
	Legal Standard		
<b>SE 57</b>	<p><b>Special education child count</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p><b>State Regulations</b> 603 CMR 23.00</p> <p style="text-align: right;"><b>Federal Requirements</b> 300.750-754; 300.145; 300.560-300.577; Family Educational Rights and Privacy Act (FERPA); 300.133</p>		

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Champion Charter School did not maintain an accurate current register of students currently enrolled at the school and who are in need of special education.

CRITERION NUMBER	Legal Standard		
<b>SE 58</b>	<p><b>Federal Special Education Entitlement Grant</b></p> <ol style="list-style-type: none"> <li>1. The district's Special Education entitlement grant is designed by appropriate local administrators who are responsible for the implementation of the local</li> </ol>		

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>special education programs and services.</p> <p>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.</p> <p>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.</p> <p>4. The district has secured the approval of the Department of Education for all amendments prior to their implementation.</p> <p><b>State Regulations</b> 28.03(1)(e)</p> <p style="text-align: right;"><b>Federal Requirements</b> 300.230; 300.340-300.500</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>TITLE 1 IX. RECORD KEEPING – General Requirements</b>
	<b>Legal Standard</b>
<b>TI 39</b>	<p>1. The district has submitted all required reports to the Department including the district Title I Plan/Application and Performance and Achievement Report.</p> <p>2. 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) determining school allocations.</p> <p>3. Current 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>1113; 1116 (c)(1)(B) NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 40</b>	<p><b>Federal Title I Grant:</b></p> <ol style="list-style-type: none"> <li>1. The district’s Title I grant is developed by appropriate local administrators who are responsible for the implementation of the local Title I programs and services.</li> <li>2. Where necessary, appropriate local administrators amend the programmatic and budgetary sections of the grant according to procedures and timelines required by the Department, including those for grant amendments,</li> <li>3. Appropriate local administrators monitor the grant in an ongoing manner to ensure its full implementation as the Department has approved it.</li> </ol>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>TITLE 1 IX. RECORD KEEPING – FISCAL REQUIREMENTS</b>
	<b>I. Maintenance of Effort</b>
	<b>Legal Standard</b>
<b>TI 1</b>	<p>The maintenance of effort fiscal test is of local and state expenditures, <i>not</i> of Title I or other federal expenditures.</p> <p>1120A(a); 9521 NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 2</b>	<p>The school district’s combined fiscal effort per student <i>or</i> aggregate expenditures of the school district and state for free public education for the preceding fiscal year was not less than 90% of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.</p> <p>1120A(a); 9521(a) NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>II. Comparability</b>
	<b>Legal Standard</b>
<b>TI 3</b>	<p>1. Documentation of the district’s Comparability Report demonstrates annual compliance with the comparability requirement and is documented at least biennially.</p> <p>1120A(c)(3)(B) NCLB</p> <p>2. The district’s comparability fiscal test is a comparison of local and state funds in Title I schools and non-Title I schools, <i>not</i> a comparison of federal funds.</p> <p>1120A(c) NCLB</p>

<b>CRITERION NUMBER</b>	
	<b>II. Comparability</b>
	<b>Legal Standard</b>
	<p>3. The school district uses state and local funds in Title I schools that provide services that, taken as a whole, are at least comparable to services in non-Title I schools.</p> <p>1120A(c)(1)(A) NCLB</p> <p>4. If all of the district’s schools are Title I schools, the school district uses state and local funds to provide services that, taken as a whole, are substantially comparable in each school.</p> <p>1120A(c)(1)(B) NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 4</b>	<p>1. The district has established and implemented the following requirements:</p> <ul style="list-style-type: none"> <li>a. a district-wide salary schedule;</li> <li>b. a policy to ensure equivalence among schools in teachers, administrators, and other staff; and</li> <li>c. a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.</li> </ul> <p>1120A(c)(2)(A) NCLB</p> <p>2. If the school district groups schools by grade-span for demonstrating comparability, the school district does so in a way that reflects the actual grade-spans of the school district.</p> <p>1120A(c)(1)(C) NCLB; Title I Policy Guidance IASA</p> <p>3. In applicable situations, the school district divides a grade-span with significant school enrollment differences into a large-group/small-group model.</p>



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	Title I Policy Guidance IASA

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is a one-school district. Therefore, comparison between district schools is not possible.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 5</b>	<p>1. Other measures, such as student/instructional staff ratios or student/instructional staff salary ratios, are used to demonstrate comparability.</p> <p>a. Student/staff ratios: The Title I school average, as determined in Comparability Report forms, does not exceed 110% of average of non-Title I schools.</p> <p>b. Student/staff salary ratios: The Title I school averages are at least 90% of the average of non-Title I schools.</p> <p>c. Staff salary differentials for years of employment are not used in implementing requirements under criterion TI 5 (b) above.</p> <p>1120A(c)(2)(B); 1120A(c)(3)(A) NCLB; Title I Policy Guidance IASA</p> <p>2. Non-instructional staff (e.g., cafeteria workers, custodians, nurses, playground aides, student teachers, volunteers, etc.) are not included in the district’s comparability determinations.</p> <p>Title I Policy Guidance IASA</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is a one-school district. Therefore, comparison between district schools is not possible.

<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
<b>TI 6</b>	<p>If the district is receiving and excluding supplemental state and local funds from the Title I comparability determinations, the district is able to demonstrate that the supplemental state and/or local funds that are excluded from Title I comparability determinations are used for programs that meet the intent and purposes of Title I.</p> <p>1120A(d) NCLB</p>		

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not receiving and excluding supplemental state and local funds from the title I supplement (not supplant) determinations.

<b>CRITERION NUMBER</b>			
	<b>III. Supplement, Not Supplant</b>		
	<b>Legal Standard</b>		
<b>TI 7</b>	The district is able to demonstrate that it uses Title I funds only to supplement and,		

<b>CRITERION NUMBER</b>	
	<b>III. Supplement, Not Supplant</b>
	<b>Legal Standard</b>
<b>[Applicable to Targeted Assistance Schools (TAS)]</b>	to the extent practical, increase the level of funds that would in the absence of Title I funds be made available from non-federal sources for the education of students participating in Title I programs.  1120A(b)(1) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not a Targeted Assistance School.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 8 [Applicable to TAS]</b>	The district/school is able to demonstrate that the Title I funds have been used for the express purpose of serving those students who were identified as being in greatest need of Title I assistance based on the district's and school's Title I student selection criteria.  1115(a) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not a Targeted Assistance School.

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>
<b>TI 9 [Applicable to Schoolwide Programs (SWP)]</b>	<p>1. Title I funds may be used in combination with state, local, and other federal funds to serve the entire school population in accordance with the schoolwide plan in effect for the school.</p> <p>1114(a)(1) NCLB</p> <p>2. The district is able to demonstrate that the Title I funds in a schoolwide program school are in addition to the total amount of funds that would, in the absence of the Title I funds, be made available from non-federal sources for the school, including funds needed to provide services required by law for students with disabilities and students with limited English proficiency.</p> <p>1114(a)(2)(B) NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

**Department of Education Findings:**

Interviews and records indicate that there is no evidence that Title I funds were combined with other state, local, and other federal funds to provide services to the entire school population.

Champion Charter School	<b>Rating: Not Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School did not provide the required documentation in order to determine compliance with the requirements under this criterion.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 10 (Exclusion)</b>	<p><i>If the district is excluding supplemental state and local funds from the Title I supplement (not supplant determinations), the district is able to demonstrate that the excluded funds are used for programs that meet the intent and purposes of Title I.</i></p> <p>1120A(d)</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School did not provide the required documentation in order to determine compliance with the requirements under this criterion.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 11</b>	<p>In implementing federal Title I supplement, not supplant requirements, the district has developed and implemented a Supplement Not Supplant policy and procedures. Note the following Department procedures in determining compliance under this criterion:</p> <ol style="list-style-type: none"> <li>1. Review the policies and procedures the district has in place to ensure that federal funds supplement and do not supplant the regular school budget and services. Who is responsible for supplement not supplant at the district and at the school building level? Are the policies and procedures adequate?</li> <li>2. Select a sample of schools. Compare the listing of personnel for last year to this year for differences in personnel, grades, and subjects taught.</li> </ol>

Brockton Public Schools	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Interviews and records indicate that there are no written policies on the subject of “supplement requirements.”

Champion Charter School	<b>Rating: Not Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------------	--------------------------------	------------------------------------	------------

**Department of Education Findings:**

The Champion Charter School did not provide the required documentation in order to determine compliance with the requirements under this criterion.

<b>CRITERION NUMBER</b>	
	<b>IV. Other Fiscal Requirements</b>
	<b>Legal Standard</b>
<b>TI 12</b>	For each split-funded staff member, the district maintains an appropriate log (time and effort record) that documents the time actually spent by staff on Title I activities.  EDGAR; OMB Circular/Cost Guidelines

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is not a Targeted Assistance Program.

<b>CRITERION NUMBER</b>	
-------------------------	--

	<b>Legal Standard</b>
<b>TI 13</b>	The district has selected eligible schools in accordance with Title I requirements under this criterion.  1113(a); 1113(b); 1113(c); NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

The Champion Charter School is a one-school district. Therefore, selection of eligible schools is not possible.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 14</b>	The district includes accurate data in its Title I Application (Form 1) for the number of students residing in each of the district’s school attendance areas.  1113(a) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	
-------------------------	--

	<b>Legal Standard</b>
<b>TI 15</b>	<p>The district has made appropriate reservations (set asides) on Form 2 in accordance with applicable NCLB requirements:</p> <ul style="list-style-type: none"> <li>a. Professional development – highly qualified staff</li> <li>b. Professional development – schools in need of improvement</li> <li>c. Choice-related transportation and supplementary services</li> <li>d. Parental involvement</li> <li>e. Homeless</li> </ul> <p>1113(c)(2)(A); 1113(c)(3) NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Partially Implemented</b>	<b>District Response Required:</b>	<b>Yes</b>
-------------------------	--------------------------------------	------------------------------------	------------

**Department of Education Findings:**

Although the Champion Charter School has appropriated reservations (set-asides) for parental involvement, interviews indicate that parents are not offered opportunities to be involved in meaningful consultation and decisions regarding Title I services.

<b>CRITERION NUMBER</b>	<b>Legal Standard</b>
<b>TI 16</b>	<p>The final allocations to schools have been calculated in accordance with Title I requirements, and the final allocation totals appropriately relate to the budget total.</p> <p>1113(a); 1113(c)(2)(A) NCLB</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 17</b>	The district has made private school allocations in accordance with Title I requirements.  1120(a); 1120(b); 1120(c) NCLB

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Not Applicable</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	-------------------------------	------------------------------------	-----------

**Department of Education Findings:**

Charter Schools are not required to meet obligations associated with serving students in private schools.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>TI 18</b>	<p>Budgeting – The district budget process demonstrates appropriate Title I program planning and implementation consistent with identified student needs at each school.</p> <p>Note the following Department procedures in determining compliance under this criterion:</p> <p>Review the latest budget, budget narrative, budget comparison, and list of Title I personnel documents to gain an understanding of the schools and grades participating in Title I programs. Interview school staff to determine which subjects and grades are Title I.</p> <ol style="list-style-type: none"> <li>a. Does the current year budget total agree with the district’s entitlement together with any carryover? If not, obtain explanation.</li> <li>b. Does the current year budget total agree with the total funds allocated on Form 1? If not, obtain explanation.</li> <li>c. Review the allocation for each school. Do the allocated dollars for each school approximate the dollarization of personnel assigned to the school as shown on the personnel list? During</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>the school visit, determine whether the personnel are assigned and teaching the grades and subjects noted.</p> <p>d. Sample schools to compare the consistency of the listing of personnel to the personnel listed on Form D of the Comparability Report. If not consistent, obtain explanation.</p> <p>MADOE Title I Grant Application Instructions and Guidance</p>

Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

Champion Charter School	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>
-------------------------	----------------------------	------------------------------------	-----------

<b>CRITERION NUMBER</b>	<b>SAFE AND DRUG FREE SCHOOLS IX. RECORD KEEPING</b>		
	<b>Legal Standard</b>		
<b>SDF 9</b>	<p>Appropriate accounting and budget procedures are being implemented to insure that program expenditures are related to the purpose and intent of the Safe and Drug Free Schools and Communities Act.</p> <p>[(EDGAR 76.730 TO 734)]</p>		
Brockton Public Schools	<b>Rating: Implemented</b>	<b>District Response Required:</b>	<b>No</b>

**Department of Education Findings:**

Appropriate accounting and budget procedures are in place and approved budgets and amendments are on file for fiscal years 2003 and 2004. Excellent documentation was found in the Business Office and with the SDFSCA Coordinator ensuring that the expenditures were strictly related to the intent of the grant. The SDFSCA Coordinator meets regularly with staff in the business office and alerts them about expenditures. Time distribution logs were maintained for individuals funded under SDFSCA funds.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>SDF 10</b>	Each recipient provides a set of assurances that the activities or programs to be funded comply with the Principles of Effectiveness and foster a safe and drug-free learning environment that supports academic achievement.  [NCLB Title IV Sec. 4114 (d) (1) (6-9)]
Brockton Public Schools	<b>Rating: Implemented</b> <span style="float: right;"><b>DISTRICT RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

Based on documentation and interviews there is evidence that the assurances convey a clear and consistent message that acts of violence and illegal use of drugs are wrong and harmful and included the required information for keeping schools safe and drug-free.

<b>CRITERION NUMBER</b>	<b>CAREER AND TECHNICAL EDUCATION IX. RECORD KEEPING</b>
	<b>Legal Standard</b>
<b>CTE 22</b>	Student records contain the items listed in the Student Record Review Checklist.  <i>Perkins Sec. 116; M.G.L. c.74 603 CMR 4.03 (4)(c)(d)</i>
Brockton Public Schools	<b>Rating: Implemented</b> <span style="float: right;"><b>District Response Required: No</b></span>

**Department of Education Findings:**

See comments in CTE 1 and CTE 2. The absence of two data elements was satisfactorily explained.

<b>CRITERION NUMBER</b>	<b>ENGLISH LEARNER EDUCATION IX. RECORD KEEPING</b>
-------------------------	---

	<b>Legal Standard</b>		
<b>ELE 18</b>	<p><b>Records of LEP Students</b></p> <ol style="list-style-type: none"> <li>1. Cumulative records of English language learners are maintained in a confidential fashion, as required by the Massachusetts Student Record Regulations, and are available to parents upon request.</li> <li>2. LEP student records include: <ol style="list-style-type: none"> <li>a. results of tests and evaluations, including, MELA-O, LAS-R and -W, MCAS, or other tests chosen by the Board of Education;</li> <li>b. information about students' previous school experiences; and</li> <li>c. Individual Student Success Plans for students who have failed MCAS, if the district is required to complete plans for non-LEP students.</li> </ol> </li> </ol> <p><b>Authority: 603 CMR 23.05, 23.07; c 69, § 1I; Title VI</b></p>		
Brockton Public Schools	<b>Rating: Implemented</b>	<b>DISTRICT RESPONSE REQUIRED:</b>	<b>No</b>

**APPENDIX:  
SCHOOL DISTRICT PROFILE INFORMATION**

The information which is provided in this Appendix was drawn from data supplied by the school district. The Department's visiting team carefully reviewed this data as part of its planning for the onsite visit and in preparing this Coordinated Program Review Report. 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 District Profile Information

## Definitions of Terms

### Profiles

#### Introduction

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

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 Schools, Collaboratives, and Vocational Training Programs.

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

The electronic version of this district's or charter school's profile information is available at:  
<http://profiles.doe.mass.edu/home.asp?mode=ot&view=&ot=5>

#### Organization Types

<b>Approved Special Education Schools</b>	Responsible for providing an education for students with disabilities. A school district (LEA) may place a student in an out-of-state program if it believes that such program is the most appropriate for the student.
<b>Charter School</b>	Public schools that are created by parents, teachers, businesses, and community leaders and have the freedom to organize their activities around a core mission, curriculum, or teaching method. Their autonomy gives them the freedom to create their own budgets and to hire and fire teachers and staff.
<b>Collaborative</b>	Collaboratives are formed through an agreement among two or more school committees to provide education for their member school systems. Agreements must be filed with the Commissioner of DOE. A Board representative of each member school committee manages them.
<b>Collaborative Programs</b>	Regardless of the size of the individual collaborative, each school provides programs that its member districts demand.
<b>Private School</b>	A non-publicly funded school that provides educational services directly to attending students.
<b>Public School</b>	Public schools are administered by a Public School District, and provide educational services directly to attending students. Expenses are paid by state appropriation.
<b>Public School Districts</b>	An administrative unit responsible for managing primary and secondary school services within a defined geographical boundary. There can be two types of School Districts, Operational and Non-Operational district, and expenses are paid by state

## The Data 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:

This section displays 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. **NOTE:** District level data only.

### Services:

- **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:

- **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. **NOTE:** District level data only.

### **Enrollment/Indicators**

#### **Enrollment by Grade**

Indicates the enrollment for students in grades Pre-kindergarten (PK), kindergarten through 12, Special Education beyond grade 12 (SP), Career and Technical Education beyond grade 12 (CT) for the listed school year.

#### **Enrollment by 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.

#### **Dropout Rate:**

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.

#### **Children Attending Public Schools**

Indicates the percent of school-age children in a city or town attending public schools, for the listed school years. **NOTE:** District level data only.

#### **Attendance/Exclusions:**

Attendance rate indicates the average percentage of enrolled students, (grades 1-12), present in school for the listed school year. Student Exclusion (count) 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. Student Exclusion (rate) indicates the rate of exclusions per 1000 students.


#### **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.

#### **Plans of High School Graduates:**

Indicates the post-graduate intentions of students for the listed school year.  
Test Results

#### **Massachusetts Comprehensive Assessment System (MCAS):**

- Shows percentage of students at each performance level for the current year
- Select a year to view past year's performance level data
- Select annual comparisons or the  icon for a graphical display of MCAS results
- For 2002 only: view Cycle II Performance Rating Reports



- For 2001 only: select a 'Grade and Subject' to view test item analysis data

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

**Finance - District level data only.**

**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:** total teaching salaries, divided by the number of full-time equivalent teachers, equals the average teacher salary.

**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.

\*\*\*\*\*

This Coordinated Program Review Final Report is also available at:  
<http://www.doe.mass.edu/pqa/review/cpr/reports/> .

MASTER CPR REPORT FORMAT 2004

SE, MOA, TI, SDFS, CTE, ELE

File Name: Brockton and Champion CS CPR Report 2004.doc

Last Revised on: April 5, 2004

Prepared by: DK-A; RT