



**Blackstone Valley Regional
Vocational Technical High School**

**COORDINATED PROGRAM REVIEW
REPORT OF FINDINGS**

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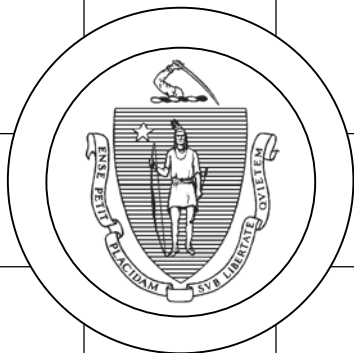
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MASSACHUSETTS DEPARTMENT OF EDUCATION
COORDINATED PROGRAM REVIEW

Blackstone Valley Regional Vocational Technical High School

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**MASSACHUSETTS DEPARTMENT OF EDUCATION
COORDINATED PROGRAM REVIEW REPORT**

Blackstone Valley Regional Vocational Technical High 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 statewide 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>.

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 focus 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.

COORDINATED PROGRAM REPORT INTRODUCTION

A six-member Massachusetts Department of Education team visited Blackstone Valley Regional Vocational Technical High School during the week of May 29 to evaluate the implementation of selected criteria in the program areas of special education, civil rights, Title 1 and nutrition. 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 six administrative staff.
- Interviews of 35 teaching and support services staff across all levels.
- Interviews of three parents representing General and Special Education.
- Interviews as requested by persons from the general public.
- Student record reviews: A sample of 69 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: 43 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. Surveys were also sent to parents of general education students who have been involved with the district's curriculum accommodation process. 16 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 10 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.

This report includes the results of the Department's pilot 2003-2004 "Focused Monitoring" procedures addressing selected special education requirements. These procedures are described in detail starting on page 9 of this report. The report also includes findings resulting from the Department's standard review procedures applied to the other regulated programs addressed during the district's Coordinated Program Review. The Coordinated Program Review report of findings in the area of special education is presented as a narrative report that addresses each of the 11 focus topics. The findings for other program areas included in this report are presented using the Department's standard Coordinated Program Review format and 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.

SPECIAL EDUCATION FOCUSED MONITORING

An Overview of Pilot Procedures

Special Education Focused Monitoring represents a significant departure from the standard monitoring process of special education programs currently being implemented through the Department's Coordinated Program Review System (CPR) that measures compliance with literally hundreds of state and federal requirements. As defined by the National Center for Special Education Accountability Monitoring, "Focused Monitoring purposefully selects priority areas to examine for compliance and results while not specifically examining other areas for compliance in order to maximize resources, emphasize important variables, and increase the probability of improved results."

The following 11 focus areas for the pilot Focused Monitoring process for FY 2004 have been selected based on priority areas identified by the Department that encompass US Department of Education, Office of Special Education Programs (OSEP) priority areas, Massachusetts Department of Education Special Education Performance Goals and Indicators, and targeted special education requirements included in the Massachusetts Special Education Continuous Improvement Plan (CIP).

- Placement and Least Restrictive Environment
- Students With Disabilities (SWD) participation in MCAS
- Students With Disabilities (SWD) performance in MCAS
- Parent participation at Team meetings
- Secondary transition services
- Graduation rates of Students With Disabilities (SWD) verses non-disabled peers
- Child find
- IEP development
- Discipline
- Pre-referral
- Disproportionality

A key difference between Focused Monitoring procedures and standard CPR monitoring procedures is that **Focused Monitoring activities are designed and implemented with a greater degree of district participation in the monitoring process.** This participation is directed through the district's **Local Work Group** that is constituted of local representatives from general and special education administrators, instructional staff, and parents. The Local Work Group actively participates in this process beginning with the district's self-assessment and continuing through to the design and implementation of any necessary corrective action activities and program improvement strategies.

Phase 1: The Desk Review of Data

The Department of Education Review Team (the Team) under the direction of the DOE Chairperson reviews and analyzes data collected by the Department through the Student Information Management System (SIMS), the Local Work Group's self-assessment based on the selected focus areas, as well as any required district documentation.

The results of this analysis are carefully documented and become the basis for the Team's investigation of concerns regarding compliance or implementation practices.

Phase 2: Onsite Document and Student Record Reviews

Based on the results of the Desk Review (Phase 1), the Team conducts an onsite review of pre-selected special and general student records, analyzes parent survey results, reviews any additional district documentation that may have been requested, and conducts any other activities that the Team considers essential to the information gathering process.

Phase 3: Onsite interview and Program Observation Activities

Using the results from Phase 2, the Team conducts onsite interviews as well as other information gathering activities the Team considers essential to document compliance, or any noncompliance and its root cause(s).

Phase 4: Focused Monitoring Report Preparation

At the completion of Phase 3, the Review Team generates a narrative report for special education. The special education Focused Monitoring findings are incorporated within the body of the district's full Coordinated Program Review Report that includes all other regulated programs reviewed by the Department.

Phase 5: Continuous Improvement Planning

The **Local Work Group** develops a Continuous Improvement Plan with the assistance of the Review Team that is designed to describe the activities necessary to address any areas needing improvement or areas of noncompliance. The district then submits the Continuous Improvement Plan to the Department for final approval by the Department's Review Team.

Phase 6: Local Monitoring of Continuous Improvement Plan

The Local Work Group established at the beginning of the Focused Monitoring process has the responsibility to not only prepare and submit to the DOE any required progress reports to document the results of the district's corrective action and program improvement activities, but also it will become the district's mechanism to implement and document ongoing internal monitoring and refinements of the Improvement Plan.

COORDINATED PROGRAM REVIEW REPORT

EXECUTIVE SUMMARY

Blackstone Valley Regional Vocational Technical High 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 school uses assessment instruments that are current, valid and examined to ensure that they are free of bias. Appropriate, credentialed and certified personnel conduct evaluations. The selection of assessments for initial evaluations and reevaluations are comprehensive in addressing the student's areas of educational and therapeutic need and targeting the student's area of suspected disability. The school adheres to the mandated timelines for annual IEP reviews and 3-year reevaluations and the 45-day timelines for the completion of evaluations and conducting of eligibility determination meetings.

All students with disabilities in the district participate in the MCAS. Intensive remedial interventions are provided to students through a wide range of support programs to assist students who receive "in need of improvement" and/or "failing" status on the MCAS.

The school has a clear process and thorough procedures in place to ensure that appropriate transition activities are implemented for students with disabilities. A strong student-centered process exists that guides a student through a sequential set of career counseling activities, academic courses and vocational competency requirements that focus upon supporting the student in the successful achievement of his/her personal career and vocational goals. The school needs to incorporate and document into students' IEPs transition planning, ongoing transition activities and students' participation in their chosen vocational program.

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 school is committed to educating students in the least restrictive environment. All students are afforded full and equal access and participation in the academic and vocational technical curriculum. The school's curriculum is in full alignment with the Massachusetts Curriculum Frameworks. Cross-curricular instructional strategies are incorporated across the academic and vocational curricula. The school's academic calendar exceeds the structured learning time requirements.

Parents and students are active participants in all aspects of the IEP process. IEPs are developed with all the required elements and there is excellent representation of general education and vocational personnel at Team meetings for the crafting of the student's proposed IEP. There is adherence to the timelines for the conducting of initial, annual and reevaluation Team meetings. The school also implements the appropriate procedures under Section 504 for eligible students.

The school thoughtfully considers a student's eligibility under the specific learning disability definition, but it does not fully document when the Team determines a student is eligible with a specific learning disability. The review of student records indicated variability in the development of goals and benchmarks on students' IEPs. The school does not always provide the proposed IEP to parents within the mandated timelines.

In the area of civil rights, there were no apparent instances of disproportionality regarding the placement of disabled, linguistic and racial minority, homeless and female/male students in the school's programs and services. A gender equity specialist is in place to address and advocate for students' needs in nontraditional shops.

The school does not have a comprehensive policy in place to appropriately identify and assess limited English proficient students and to provide the necessary follow-up services to former students with limited English proficiency. The requirements are implemented regarding the enrollment, placement and transportation of homeless students. In-school programs are available for pregnant students to meet their academic, vocational and health needs.

Students most in need of services are identified according to the criteria specified in the Title I regulations. The school is commended for administering the Stanford Diagnostic Reading Test and a Wilson Reading screening in March to entering freshmen. Students who perform poorly on the Wilson screening are further tested with the WADE by a Wilson Reading Specialist, who visits each sending school. This early testing facilitates scheduling students into reading classes and establishing a rank order list for Title I services.

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?

Parents are integrally involved throughout the entire IEP process and through multiple junctures of review of the individual student's progress from the time of admission through the four years of attendance at the school. The school makes every effort to ensure parental participation at Team meetings and to secure parental consent in accordance with the regulations and requirements.

Concerns exist regarding the need for the school to implement consistent process and procedures to ensure that parents who require language assistance, in languages other than English, are provided with the necessary oral and/or written translations.

The school has a Title I parental involvement policy and a school-parent compact. It has also utilized the Title I Dissemination Project materials to help build parental capacity; however, it should consider innovative efforts to gain further parental involvement to help their children's achievement.

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 school holds all students to high expectations and standards. Its programs are designed to maximize student performance; the curriculum is aligned with the Massachusetts Curriculum Frameworks and is coordinated across program areas.

All students have equal opportunity and full access to participate in the school's extracurricular activities and programs. There are also ongoing efforts to work with the sending districts to expand and extend the extracurricular offerings into students' local communities.

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?

The school strives to maintain an in-school climate that is safe, respectful and responsive to the diverse educational and social-emotional needs of the students. The administrative and teaching personnel seek to provide ongoing supports and resources to ensure students a learning environment where each student can work and achieve to his/her maximum potential. The school's handbook includes the required elements regarding due process for disciplinary proceedings, appropriate procedures for students for disabilities, notification of non-discrimination, and procedures for grievances regarding harassment and discrimination. There is a clear hierarchy regarding consequences for violations of the discipline code.

IEP Teams address an individual student's need for increasing levels of intervention. The guidance department is responsible for providing ongoing intervention for social-emotional and behavioral issues for regular education students and students on Section 504 plans. Concerns exist regarding the lack of a formalized process and procedures to ensure regular oversight at key junctures and a coordinated behavioral response to the provision, the tracking and the monitoring of interventions for individual students.

In the area of civil rights, the counseling program and the activities and materials offered are free from bias and stereotypes. The program itself is comprehensive, extensive and integral to the student's school life. The Review Team noted the intensive six-week exploratory process, monthly group meetings by shop, the view of career development across the curriculum and the ongoing development of students' skills through small groups or individual sessions throughout the student's four years of attendance at the school.

The school is in full compliance with Title I requirements. All students have equal access to Title I.

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 Review Team noted that the District Curriculum Accommodation Plan is an outgrowth of the strong commitment and significant efforts of the entire school community to afford students the opportunity, access and choice to succeed and achieve through the wide spectrum of academic, vocational, nonacademic and extracurricular programs and support systems.

The school has established a 193-day school year calendar, instituted cross curricular initiatives and support programs, including but not limited to the teacher/teacher program, the Jason Project, the Behavioral Resource Center, the reading program and revamped the course and shop schedule. The administration is highly accessible to teaching and guidance personnel. There is close collaboration and constant networking among the school personnel to ensure that the diverse needs of all students are met. Extensive professional development is offered to personnel through in-school and out-of-school offering. Staff training is provided on an annual basis in the area of civil rights responsibilities.

The school has developed a new model for the implementation of the instruction support intervention process. The Student Review Team (SRT) has personnel represented from guidance, counseling, administration and regular and special education. The school, at this juncture, needs to work on addressing early identification and access for referral of students to the Student Review Team and demonstrating consistency in the documentation of the SRT process and the tracking of interventions considered and provided to students.

The Title I paraprofessionals all have a bachelor's degree. The reading paraprofessionals are Wilson trained and the math paraprofessional has passed the MTEL and is taking math courses. Paraprofessionals work under the supervision of the classroom teacher and coordinate and collaborate with the classroom teacher.

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 school building is currently undergoing extensive reconstruction and renovation. Title I instruction is provided in the regular classroom, or in facilities that are conducive to learning, and provide opportunities for students to succeed.

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?

There is a curriculum review process in place where the general education department annually evaluates the effectiveness of current curriculum offerings. Cross-curricular initiatives have created cohesiveness in curriculum offerings through general, special and vocational education and guidance.

The school's administrative Leadership Team meets to review issues and concerns for civil rights policies, procedures and programs on a weekly basis. However, the school did not provide documentation regarding the efforts and results of its processes and procedures. The school has recently developed a three-year plan to analyze and develop stronger policies in the area of civil rights, which includes the involvement of the Massachusetts Association of School Committee.

The school evaluates its Title I program informally and uses the results for improvement. This past year, a math tutoring program was started. With minimal parental involvement, the school should encourage and provide parents with more opportunities for input on program needs, program implementation, program evaluation and improvement.

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 school is in general compliance in this area. It uses federal grant funds in accordance with federal Title I fiscal requirements, including supplement not supplant provisions.

DEFINITION OF TERMS
FOR THE RATING OF EACH COMPLIANCE CRITERION

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

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 (Focus Areas: Participation in MCAS, Student performance in MCAS, Secondary Transition Services)

**SPECIAL EDUCATION FOCUS AREA:
Participation of Students With Disabilities in State Assessment Programs**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

| | | |
|-------------|---|--|
| SE 5 | <p>Participation in general State and district-wide assessment programs</p> <ol style="list-style-type: none"> 1. All students with disabilities whose placements are funded by the district are included in the Massachusetts Comprehensive Assessment System (MCAS) and other district-wide assessment programs. 2. The district’s IEP Teams designate how each student will participate and, if necessary, provide an alternate assessment. <p>State Regulations</p> | <p>Federal Requirements 34 CFR 300.138; 300.139</p> |
|-------------|---|--|

Data Collection, Planning and Validation:

The review team validated the participation of students with disabilities in the MCAS through a review of the following: data and documentation submitted by the district, data collected by the DOE through the SIMS(Student Information Management System) and the special education student records.

Strengths of District’s Practices for this Focus Area:

The school makes exemplary and significant efforts to provide all students with a high level of remediation through a wide range of support programs and opportunities including but not limited to tutors, flexible class groupings, team teaching, reading and writing programs, assistive technology, after school sessions and summer programs.

Compliance Status:

The review of the district SIMS data and the district documentation indicated that there is full participation of students with disabilities in the MCAS. The student record review validated the provision of accommodations to students with disabilities to ensure full access and ability to participate in the MCAS. The district submitted a list of student groupings organized specifically for the administration of the MCAS and the standard and non-standard accommodations provided to students for the MCAS.

**FOCUS AREA:
Secondary Transition**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

| | |
|------|---|
| SE 6 | <p>Determination of transition services</p> <ol style="list-style-type: none"> 1. For a student who is 14 years of age, the Team considers the student’s course of study in relation to the student’s future goals and document this in the IEP. 2. For a student who is 16 years of age, or younger if appropriate, the Team includes in the IEP services that promote movement of the student from school to post-school activities, including post-secondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation. 3. The transition services are based upon the student's needs, taking into account the student's preferences and interests and includes specially designed instruction, community experiences, the development of employment or other post-school adult living objectives, and, if appropriate, the acquisition of daily living skills and functional vocational evaluation. 4. For any student approaching graduation or the age of twenty-two, the Team determines whether the student is likely to require continuing services from adult human service agencies. In such circumstances, the Administrator of Special Education makes a referral to the Bureau of Transitional Planning in the Executive Office of Health and Human Services in accordance with the requirements of M.G.L. c.71B, §12A-§12C (known as Chapter 688). 5. <i>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.</i> 6. The district ensures that students age 14, or younger if appropriate, are invited to and encouraged to attend part or all of Team meetings at which transition services are discussed or proposed <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%;"> <p>State Requirements M.G.L. Ch.71B, Sections 12A-C 603 CMR 28.05(4)(c)</p> </div> <div style="width: 45%;"> <p>Federal Requirements 34 CFR 300.344(b), 300.347</p> </div> </div> |
|------|---|

Data Collection, Planning and Validation:

The documentation submitted by the local work group showed that there is a thorough process and clear procedures in place to ensure that the appropriate transition activities are actively addressed for students with disabilities. The local work group also submitted a description of the transition planning process from a student’s eighth grade planning meeting through a student’s four years of attendance at the high school. A Student Portfolio Handbook and a completed Work/Study Employment packet were submitted to further support the district’s implementation of the transition and Work/Study process and procedures. The Review Team reviewed special education student records and conducted interviews with administrative, academic, vocational and special education staff.

Strengths of District’s Practices for this Focus Area:

The administrative, teaching and guidance personnel foster a student-centered process that guides a student through a sequential set of career counseling activities, academic courses and vocational

competency requirements that focus upon supporting the student in the successful achievement of his/her personal career and vocational goals. There are ongoing efforts to shape the process to align with a student's individual educational and/or therapeutic needs. There is flexibility in the adjustment of the vocational program to address student's preferences and readiness issues. The exploratory processes can extend beyond the prescribed period per student or parent request if there is a need to explore different shop environments.

The Work/Study program is able to absorb students who are not eligible for the Co-op program due to a lack of preparedness regarding workplace skills or lack of specificity in the targeting of post-secondary goals and the designation of a specific vocational shop.

Compliance Status:

The school has a clear process and thorough procedures in place to ensure that appropriate transition activities are implemented for students with disabilities. Transition planning is addressed through the entire IEP process. Students, who are 14 years of age and older, are invited and typically in attendance at Team meetings and are actively engaged in discussions throughout the process regarding their interests, in-school career goals, academic and vocational progress and post-school aspirations. The school provides students with notice of age of majority, transfer of parental rights and 688 referrals at appropriate junctures. There is also public agency participation throughout the IEP process, including attendance at IEP Team meetings.

The review of student records raised concerns regarding the lack of documentation of the school's efforts and the ongoing transition activities into students' IEPs, as validated through the interviews of the Review Team and the parent surveys. Transitional language was not always incorporated into the IEP. Vision statements did not always reflect the student's perspective and future goals including his/her interests, current vocational status, post-secondary plans and current academic and vocational performance. There was a lack of evidence regarding the type of follow-up taken to address a student's need for clarification regarding the vision statement and goals. IEP goals and benchmarks did not always address the student's participation in his/her vocational program.

Suggestions For Improved Results:

- Continuation of the Local Work Group or development of a new Study Group, composed of personnel across the curriculum and program areas, responsible for oversight and monitoring of the implementation of the school's Continuous Improvement Plan
- Reemphasize with staff the incorporation of a student's individualized goals, needs and interests, as reflected in career counseling activities, general education and vocational program competencies, into the IEP process
- Work with personnel on understanding the process of incorporating transitional language into IEPs
- Development of guidelines, guides and templates for implementation of improvement activities
- Incorporation of goals, when appropriate, that address student's cross-curricular needs into IEPs

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 (Focus Areas: Placement in Least Restrictive Environment, Child Find, IEP Development, and Disproportionality)
 - Civil Rights Methods of Administration (MOA)
(Report Issues # MOA 1-6)
 - Title I (Report Issues # TI 19-20)

**SPECIAL EDUCATION FOCUS AREA:
Placement and Least Restrictive Environment**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

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| <p>SE 18B</p> | <p>Determination of placement; provision of IEP to parent</p> <ol style="list-style-type: none"> 1. At the Team meeting, after the IEP has been fully developed, the Team determines the appropriate placement to deliver the services on the student's IEP. 2. Unless the student's IEP requires some other arrangement, the student is educated in the school that he or she would attend if the student did not require special education. 3. The decision regarding placement is based on the IEP, including the types of related services that are to be provided to the child, the type of settings in which those services are to be provided, the types of service providers, and the location at which the services are to be provided. 4. The placement selected by the Team is the least restrictive environment consistent with the needs of the student. 5. Immediately following the development of the IEP, and within 45 school working days after receipt of the parent's written consent to an initial evaluation or reevaluation, the district provides the parent with two (2) copies of the proposed IEP and proposed placement along with the required notice, except that the proposal of placement may be delayed according to the provisions of 603 CMR 28.06(2)(e) in a limited number of cases. <p>State Regulations 28.05(6) and (7)</p> <p>Federal Requirements 34 CFR 300.346</p> |
| <p>SE 20</p> | <p>Least restrictive program selected</p> <ol style="list-style-type: none"> 1. The program selected is the least restrictive environment for students, with consideration given to any potential harmful effect on the student or on the quality of services that he or she needs. 2. If the student is removed from the general education classroom at any time, the Team states why the removal is considered critical to the student's program and the basis for its conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily. <ol style="list-style-type: none"> 1. The district does not remove an eligible child from the general education classroom solely because of needed modification in the curriculum. 2. 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. <p>State Regulations 28.06(2)(a); Chapter 71B, section 3</p> <p>Federal Requirements 34 CFR 300.130; 300.550-300.556</p> |

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| SE 33 | <p>Involvement in the general curriculum</p> <ol style="list-style-type: none"> 1. District personnel reflect a full understanding of the connection between the Massachusetts Curriculum Frameworks and the expectations of the state for student performance as well as the rights of students with disabilities to be full participants in the general curriculum. 2. The district has either aligned its district curriculum with the Frameworks or has taken steps to provide students (including all students with disabilities) with essential learning opportunities that prepare the students to reach the state graduation standards. 3. At least one member of all IEP Teams is familiar with the general curriculum and is able to discuss an eligible student’s appropriate access to the general curriculum. 4. In the IEP the district documents the student’s participation in the general curriculum. <p>State Regulations 28.05(4)(a) and (b)</p> <p>Federal Requirements 34 CFR 300.347(a)(1)(i); 300.137</p> |
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| SE 48 | <p>FAPE (Free, appropriate, public education): Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education</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. Programs, services and activities include, but are not limited to:</p> <ol style="list-style-type: none"> 1. art and music 2. vocational education, industrial arts, and consumer and homemaking education 3. work study and employment opportunities 4. counseling services available at all levels in the district 5. health services 6. transportation 7. recess and physical education, including adapted physical education 8. athletics and recreational activities 9. school-sponsored groups or clubs 10. meals <p>State Regulations 28.06(5)</p> <p>Federal Requirements 34 CFR 300.121; 300.300-313</p> |
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Data Collection, Planning and Validation:

The Review Team established, through the review of district documentation, DOE data, the student records and the interview process, that the school provides equal access and full opportunity for students to be educated in the least restrictive environment through: the development of a comprehensive continuum of services, incorporation of cross-curricular instructional strategies across the academic, vocational and remedial programs, full alignment with the Massachusetts Curriculum Frameworks, and competency-based career counseling and vocational education programs.

Strengths of District's Practices for this Focus Area:

The district's commitment to educating students in the least restrictive environment affords all students full and equal access and participation in the academic and vocational technical curriculum and in extracurricular programs. The district has developed a continuum of services, including teacher-teacher and inclusion classrooms, academic and vocational aides and significant reading support services that offer students a wider spectrum of options within the general education, vocational and special education programs. The district implemented an overhaul of the school schedule in order to incorporate more flexibility for course selection and for transitioning students to a different academic classroom according to the level of support required. Individual students are placed in academic core courses according to the student's skills level and progress within the general education curriculum. The district has successfully integrated the areas of reading, writing, mathematics, study strategies, respect and career development across the academic and vocational curriculum. Assistive technology is incorporated into a student's program across the curriculum, when necessary, to provide full and equal access regarding participation in academic and vocational technical programs.

The vocational technical program has adopted a competency-based curriculum that assesses students according to the individual's skill and ability in accordance with industry standards. The counseling program is integral to the school's overall program in providing students with increasing proactive supports and resources in career planning and social-emotional based issues and contact time with students in the classroom and in the shops. A comprehensive competency-based school counseling program is in place that recognizes and tracks the changes in the student's needs, interests and growth throughout the individual's tenure at the high school.

The close collaboration between the general education, vocational technical and special education staff has created an educational environment that fosters a high level of respect between student and staff and promotes ongoing communication and networking to ensure that the diverse needs of the student population are met.

Compliance Status:

Through the review of student records, the Review Team has validated that all students are involved in general education and vocational curricula to the extent they will be successful. A review of individual schedules indicated that individual students are placed in academic core courses according to the student's skills level and progress within the general education curriculum. When appropriate, assistive technology has been considered and incorporated into the IEP. IEP progress reports were consistently documented in the students' records.

1. Use of Paraprofessionals-Interviews indicated that there is not a formal system in place for teacher aides to receive regularly scheduled supervision, regarding the delivery of services and the designing of instruction, by appropriately certified special education teachers in accordance with the federal requirements: 300.136(f).
2. Instructional Grouping Requirements- Level 3 courses are resource room classes for students on IEPs as part of the continuum of services. Since these classes are exclusively for students on IEPs, the instructional group size is regulated under 603 CMR 28.06(6). The Department's review of the Level 3 course lists show that some of the courses do not adhere to the requirements for the instructional group size. When an increase in the instructional group size occurred, the district did not follow the mandated procedures regarding notification to the Department and parents or the provision of a full-time aide in the class.
3. Provision of IEP to Parents/Guardians: The student record review and the review of the IEP timeline-tracking log showed that proposed IEPs are not always provided to parents within the mandated timeline. The written notice N1 that accompanies the proposed IEP responded to the required questions; however, the date on the N1 was not always consistent with the date that the proposed IEP was actually sent out.

The school has indicated that an internal review has been conducted to identify the factors that are impacting the delays in the provision of the proposed IEP to parents/guardians. The following steps have been taken to address the delays: in-service training, redistribution of tasks and adjustment of work loads, monitoring of due dates, provision of substitute coverage and the convening of a study group to address oversight and monitoring of the process. The school has also revised the Team meeting summary sheet that is provided to parents/guardians at the conclusion of an IEP Team meeting. The revised Team meeting summary clearly indicates that it is a summary to document the Team's decisions during the meeting and that a full proposed IEP will be sent from the school for their review.

Suggestions For Improved Results:

- Continuation of the Local Work Group or development of a new Study Group, composed of personnel across the curriculum and program areas, responsible for oversight and monitoring of the implementation of the school's Continuous Improvement Plan and compliance with the mandated timeline regarding the provision of the proposed IEP to parents/guardians
- Restructure Level 3 instructional groups to adhere to the instructional class size requirements, as regulated under 603 CMR 28.06(6)
- Develop a plan for provision of regularly scheduled supervision to teacher aides by appropriately certified special education teachers for the 2004-05 school year.

**FOCUS AREA:
Child Find**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

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| SE 15 | <p>Outreach by the School District (Child Find) The district has annual or more frequent outreach and continuous liaison with those groups below from which promotion or transfer of students in need of special education may be expected, or which would include students in need of special education:</p> <ol style="list-style-type: none"> 1. professionals in community 2. private nursery schools 3. day care facilities 4. group homes 5. parent organizations 6. clinical /health care agencies 7. early intervention programs 8. other public/private/parochial schools 9. other agencies/organizations 10. the school itself, including charter schools 11. agencies serving migrant and/or homeless persons pursuant to the McKinney-Vento Education Act for Homeless Children <p style="text-align: center;">State Regulations Federal Requirements 34 CFR 300.125; 300.312</p> |
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Data Collection, Planning and Validation:

The review of documentation indicated that the district conducts outreach activities to sending schools, clinical and health agencies, community professionals, parent organizations and agencies serving migrant and homeless persons. A letter is sent to the above contact groups, at least annually, to notify them of their outreach efforts.

Compliance Status: The district implements child find activities in accordance with the above requirements.

**FOCUS AREA:
IEP Development**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

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| SE 9 | <p>Eligibility determination: Timelines for evaluation, provision of IEP and/or identification of other needed instructional programs</p> <ol style="list-style-type: none"> 1. Within forty-five school working days after receipt of the parent's written consent to an initial evaluation, unscheduled evaluation, or re-evaluation, the school district: <ol style="list-style-type: none"> a. provides an evaluation b. convenes a Team meeting c. determines whether the student has one or more disabilities d. determines if the student is making effective progress in school e. determines if any lack of progress is a result of the student's disability f. determines if the student requires special education and/or related services and/or accommodations in order to make effective progress or that the student requires related services in order to access the general curriculum g. develops an IEP and proposed placement where the student is found to need special education h. provides the parent with the proposed IEP and placement, or a written explanation of the finding of no eligibility i. determines that a student is ineligible to receive special education and/or the student's lack of progress is due to a lack of instruction in reading or math or limited English proficiency or social maladjustment, the student is referred to a more appropriate instructional program or support service j. determines at the time of re-evaluation if the student would continue to make progress in school without the provision of special education services and/or related services. 2. If a Team determines that a student is not eligible for special education but may be eligible for accommodation(s) for disability(ies) under Section 504, the student is referred for consideration by the district for eligibility under that regular education program. 5. When the development of a student's IEP does not indicate a need for direct services, the Team makes a finding of no eligibility and appropriate services are provided through the district's general education program. <p>State Regulations 28.05(1) and (2)</p> <p style="text-align: right;">Federal Requirements 34 CFR 300.534</p> |
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| SE 18A | <p>IEP development and content</p> <ol style="list-style-type: none"> 1. Upon determining that the student is eligible for special education, the Team, including the parent(s), develops an IEP at the Team meeting using the evaluation data to guide development of measurable, annual goals and objectives/benchmarks for the student. If the district chooses to draft any element(s) of the IEP for discussion, the Team Chairperson ensures that those elements are genuinely |
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| | <p>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> <ol style="list-style-type: none"> 2. The IEP includes specially designed instruction to meet the needs of the individual student and related services that are necessary to allow the student to benefit from the specially designed instruction, or consists solely of related services that are necessary to allow the student to access the general curriculum, consistent with federal and state requirements. 3. In developing the IEP, the Team proposes specially designed instruction and related services according to the needs of the child <u>and not</u> according to the availability of such instruction or related services. 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. 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. 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. 7. The IEP is written in generally understandable language. <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">State Regulations</td> <td style="width: 50%;">Federal Requirements</td> </tr> <tr> <td>28.05(3), (4), (6) and (7)</td> <td>34 CFR 300.340-300.350; 300.343(a)</td> </tr> <tr> <td>28.06(2)</td> <td>34 CFR Part 300, Appendix A, Question #22.</td> </tr> </table> | State Regulations | Federal Requirements | 28.05(3), (4), (6) and (7) | 34 CFR 300.340-300.350; 300.343(a) | 28.06(2) | 34 CFR Part 300, Appendix A, Question #22. |
| State Regulations | Federal Requirements | | | | | | |
| 28.05(3), (4), (6) and (7) | 34 CFR 300.340-300.350; 300.343(a) | | | | | | |
| 28.06(2) | 34 CFR Part 300, Appendix A, Question #22. | | | | | | |

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| SE 22 | <p>IEP implementation and availability</p> <ol style="list-style-type: none"> 1. Where the IEP of the student in need of special education has been accepted in whole or in part by that student's parent, the school district provides the mutually agreed upon services without delay. 2. At the beginning of each school year, the district has an IEP in effect for each eligible student within its jurisdiction. 3. Each teacher and provider described in the IEP is informed of his or her specific responsibilities related to the implementation of the student's IEP. 4. The school district does not delay implementation of the IEP due to lack of classroom space or personnel, provides as many of the services on the accepted IEP as possible and immediately informs parents in writing of any delayed services, reasons for delay, actions that the school district is taking to address the lack of space or personnel and offers alternative methods to meet the goals on the accepted IEP. Upon agreement of the parents, the district implements alternative methods immediately until the lack of space or personnel issues are resolved. <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">State Regulations</td> <td style="width: 50%;">Federal Requirements</td> </tr> <tr> <td>28.05(7)(b); 28.06(2)(d)(2)</td> <td>34 CFR 300.342</td> </tr> </table> | State Regulations | Federal Requirements | 28.05(7)(b); 28.06(2)(d)(2) | 34 CFR 300.342 |
| State Regulations | Federal Requirements | | | | |
| 28.05(7)(b); 28.06(2)(d)(2) | 34 CFR 300.342 | | | | |

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| SE 36 | <p>IEP implementation, accountability and financial responsibility</p> <ol style="list-style-type: none"> 1. The district ensures that IEPs are implemented without delay upon parent consent. 2. 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. |
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| | <ol style="list-style-type: none"> 3. The district makes a good faith effort to assist the child to achieve the goals and objectives or benchmarks listed in the IEP. 4. The district provides all programs and services without expense to the child's parents. 5. Each time the school district proposes to access the parent's private insurance 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. | <p style="text-align: center;">State Regulations 28.06(3)</p> <p style="text-align: center;">Federal Requirements 34 CFR 300.142; 300.350</p> |
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Data Collection, Planning and Validation:

The Review Team reviewed documentation submitted by the district, student records and conducted interviews to validate compliance regarding the implementation of the mandated IEP process and procedures in accordance with the above requirements and federal and state regulations.

Strengths of District's Practices for this Focus Area:

The interviews reflected the sense of responsibility and commitment that the teaching, guidance and administrative personnel demonstrate toward ensuring that IEP meetings are student and parent centered and that the student's educational plan is individualized and crafted to meet the student's educational needs. Respect is an integral part of the Team meeting process and it is evident that parents and students actively participate with staff to consider and develop all elements of the IEP. There is excellent representation and attendance of the required Team members, including general education and vocational personnel at initial evaluation, reevaluation and annual review meetings.

The Review Team noted that academic and vocational personnel are intent on ensuring that the tools and equipment that are provided to assist students can be adapted to meet a variety of educational needs, industry standards and academic requirements.

Interviews indicated that all personnel are involved in the implementation of cross-curricular instructional strategies in the areas of reading, writing and mathematics. Personnel from the special education department and the reading program maintain communications and conduct regular site visits to the vocational shops to monitor the ongoing effectiveness of cross-curricular learning strategies for individual students.

Compliance Status:

The Review Team validated, through the student record review, that the district uses the mandated forms to address all elements of the IEP process, and there is adherence to the timelines for the conducting of initial, annual and reevaluation Team meetings. Required procedures were implemented for the assessment and eligibility determination process. A finding of no eligibility notice was sent to the parent/guardian within the 10-day mandated timeline. IEP Teams always consider the student's need for assistive technology in the academic courses and the vocational program.

When the Team determined that a student needed accommodations and modifications, the school implemented the appropriate process and procedures under Section 504 to provide the student with a Section 504 Accommodation Plan.

The Review Team noted that IEP Teams are aware of the requirements regarding the process and procedures for the determination of a specific learning disability. However, the Review Team found that there was no documentation regarding the required observation, and there was inconsistent documentation of a written justification, for students who are determined eligible with a specific learning disability in the student records. There was evidence in the written notice regarding the school's proposal to act that an observation is included as part of the overall assessment, on the proposal to evaluate form for initial evaluations and reevaluations.

The review of student records indicated that there is variability in the way goals and benchmarks are developed on students' IEPs. There were academic goals and goals developed for the exploratory period that were well written and measurable. However, in other instances, goals were not always measurable and focused upon the regular education curricular requirements rather than the student's need for specialized instruction and/or support in the area of the student's disability (ies).

Interviews reflected the implementation of cross-curricular strategies, accommodations and modifications for students in the vocational program. However, the Review Team noted that there was a lack of documentation regarding the school's efforts and the provision of individualized programming for students in the vocational shops in each student's IEP in the following areas:

Vocational goals were not always developed for the individual student

The provision of services in the vocational program and the personnel responsible were not documented in the service delivery grid

Cross-curricular instructional strategies, accommodations and modifications were not always documented in the areas of reading, writing and mathematics to address a student's participation in his/her vocational program.

Suggestions For Improved Results:

- Development of action plan and schedule for the implementation of action plan
- Review of existing IEPs and training for personnel responsible for writing IEPs
- Plan for oversight and monitoring of IEPs
- Plan for oversight and monitoring of intervention efforts implemented regarding student's progress by academic, vocational and guidance personnel
- In-house workshops to address the incorporation of IEP goals across curriculum areas (academic, vocational and guidance)

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 3 | <p>Access to a full range of education programs 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> |
| | <p>Rating: Implemented District Response Required: No</p> |

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 4 | <p>Placement of disabled, linguistic and racial minority, homeless, and female/male students 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> |

Data Collection, Planning and Validation:

The Review Team reviewed the district’s data and MADOE data to validate the district’s compliance status regarding any patterns of placement for the protected student populations.

Compliance Status:

The review of the district’s data and the Department’s data showed no apparent instances of disproportionality regarding the placement of disabled, linguistic and racial minority, homeless and female/male students in the school’s programs and services.

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 5A | <p>Placement of homeless students According to the best interest of the homeless student, the district either</p> <ol style="list-style-type: none"> 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 2. enrolls the student in any public school that nonhomeless students who live in the attendance area where the student is actually living are eligible to attend. <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> |
| | Rating: Implemented District Response Required: No |

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 5B | <p>Immediate enrollment of homeless students 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> <p>NCLB: Title X, Part C, Sec. 722(g)(3)(C)(i)</p> |
| | Rating: Implemented District Response Required: No |

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 5C | <p>Transportation of homeless students to and from the school of origin 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</p> |

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| CRITERION NUMBER | |
| | Legal Standard |
| | costs are shared equally. NCLB: Title X, Part C, Sec. 722(g)(1)(J)(iii) |
| | Rating: Implemented District Response Required: No |

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 6 | Availability of in-school programs for pregnant students Pregnant students are permitted to remain in regular education classes and participate in extracurricular activities with non-pregnant students throughout their pregnancy, and after giving birth are permitted to return to the same academic and extracurricular program as before the leave. Title IX: 20 U.S.C. 1681; 34 CFR 106.40(b) |
| | Rating: Implemented District Response Required: No |

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| CRITERION NUMBER | TITLE 1 II. STUDENT IDENTIFICATION AND PLACEMENT |
| | Legal Standard |
| TI 19 | (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. 1115 (b)(1)(B) NCLB |
| | Rating: Implemented District Response Required: No |

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| CRITERION NUMBER | |
| | Legal Standard |

| CRITERION NUMBER | |
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| | Legal Standard |
| TI 20 | <p>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.</p> <p>1115(b)(2)(A) NCLB</p> |
| | <p>Rating: Implemented District Response Required: No</p> |

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 (Focus Area: Parent Participation At Team Meetings)
- Civil Rights Methods of Administration (MOA) (Report Issue # MOA 7)
 - Title I (Report Issues # TI 21-23)

**SPECIAL EDUCATION FOCUS AREA:
Parent Participation At Team Meetings**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

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| <p>SE 8</p> | <p>Evaluation Team composition The following persons are members of the evaluation Team:</p> <ol style="list-style-type: none"> 1. The child's parents 2. A representative of the school district who acts as Chairperson and who is (1) qualified to supervise or provide special education; (2) is knowledgeable about the general curriculum; and (3) is knowledgeable about the availability of resources of the district. 3. A representative of the school district who has the authority to commit the resources of the district (and who may act as the Chairperson) 4. A teacher who has recently had or currently has the student in a classroom or other teaching situation. If the student is involved or may be involved in a regular education program, a regular education teacher must be included as a Team member. 5. The student, age fourteen and older, if he/she chooses 6. Other individuals at the request of the student's parents 7. At least one teacher or specialist trained in the area of the student's suspected special needs 1. Individuals who are qualified to interpret the instructional implications of evaluation results 2. Other individuals who may be necessary to write an IEP for the child, as determined by the Administrator of Special Education 10. When one purpose of the Team meeting is to discuss transition services, the student age sixteen or older (or younger, if appropriate) is a part of Team process. If the student does not attend the Team meeting, the school district ensures that the Team is informed of the student's interests and preferences. 11. When one purpose of the Team meeting is to discuss transition services, a representative of any public agency who may be responsible for providing or paying for transition services is invited to the Team meeting. If the representative(s) does not attend the meeting, the school district takes other steps to obtain the participation of these agencies. 12. When one purpose of the Team meeting is to discuss vocational education needs, a person knowledgeable about vocational education placement options is present at the meeting. <p>State Regulations 28.02(22)</p> <p>Federal Requirements 34 CFR 300.344; 300.552</p> |
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| SE 24 | <p>Notice to parent regarding proposal or refusal to initiate or change the identification, evaluation, or educational placement of the child or the provision of FAPE</p> <ol style="list-style-type: none"> 1. A student may be referred for an evaluation by a parent or any person in a caregiving or professional position concerned with the student's development. 2. When a student is referred for an evaluation to determine eligibility for special education, the school district sends written notice to the child's parent(s) within 5 school days of receipt of the referral. 3. Notice is given by the district within a reasonable time for all other actions. 4. <i>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</i> 5. <i>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</i> 6. <i>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.</i> 7. <i>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.</i> <p>State Regulations 28.04(1)</p> <p>Federal Requirements 34 CFR 300.503(a)</p> |
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| SE 25 | <p>Parental consent</p> <p>In accordance with state and federal law, the school district obtains informed parental consent as follows:</p> <ol style="list-style-type: none"> 1. The school district obtains written parental consent before conducting an initial evaluation or making an initial placement of a student in a special education program. Written parental consent is obtained before conducting a reevaluation and before placing a student in a special education placement subsequent to the initial placement in special education. 2. The school district obtains consent before initiating extended evaluation services. 3. The school district obtains consent to the services proposed on a student's IEP before providing such services. 4. The school district obtains consent prior to placing a student in an initial special education placement and for any subsequent placement. 5. <i>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.</i> 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. |
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| | <p>7. If, subsequent to initial evaluation and initial placement and after following the procedures required by the regulations, the school district is unable to obtain parental consent to a reevaluation or to placement in a special education program subsequent to the initial placement, or the parent revokes consent to such reevaluation or placement, the school district considers with the parent whether such action will result in the denial of a free appropriate public education to the child. If, after consideration, the school district determines that the parent's failure or refusal to consent will result in a denial of a free appropriate public education to the student, it seeks resolution of the dispute through Special Education Appeals</p> <p>State Regulations 28.07(1)</p> <p>Federal Requirements 34 CFR 300.500(b)(1)</p> |
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| SE 26 | <p>Parent participation in meetings</p> <ol style="list-style-type: none"> 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. 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. 3. The district schedules the meeting at a mutually agreed upon time and place; and documents such efforts. 4. If neither parent can attend, the district uses other methods to ensure parent participation, including individual or conference telephone calls, or video conferencing. 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. <p>State Regulations 28.02(22)</p> <p>Federal Requirements 34 CFR 300.345(d), 300.501</p> |
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Data Collection, Planning and Validation:

The student record review and the summary of data collected for the Continuous Improvement Plan was reviewed to validate the district's practices under the above criteria areas.

Strengths of District's Practices for this Focus Area:

Parents/guardians are regarded as full participants in the entire IEP process, as exemplified in the extensive outreach to parents/guardians through the admission process and through the multiple junctures of review of the individual student's progress and educational /vocational program. There is evidence of ongoing communications and interfacing with parents throughout the IEP process to ensure that the parents' perspective is considered and integrated in Team discussions.

Compliance Status:

There is a high level of participation of parents and students at Team meetings. The district reschedules meetings to ensure parental and student attendance. The student record review indicated that parental consent is secured in accordance with the regulations and requirements. The district has current consented-to IEPs for students in effect at the beginning of the school year.

The Review Team has concerns regarding the manner and consistency by which communication in the home language is implemented. The student record review showed that the documents, assessment reports and written communications relevant to the IEP process were not always translated for parents whose primary language was other than English. There was evidence of interpreters in attendance at Team meetings. In some cases, the school utilized relatives for interpreters rather than persons who were knowledgeable with special education procedures, services and programs. Interpreters were not always used to assist parents, when necessary, outside of the Team Meeting process for purposes of notification, scheduling and /or obtaining information. (Refer to MOA 7 regarding the implementation of the civil rights requirements for the translation of school announcements, notices and informational materials into the primary language of the home for parents with limited English skills.)

Suggestions For Improved Results:

- Revision of Home Language Survey
- Listing of available resources to access for translation purposes
- Revise Team Chairperson's procedural checklist
- Develop a plan for administrative oversight and monitoring

| CRITERION NUMBER | CIVIL RIGHTS METHODS OF ADMINISTRATION III. PARENTAL INVOLVEMENT |
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| | Legal Standard |
| MOA 7 | <p>Information to be translated into languages other than English 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> |
| | <p>Rating: Partially Implemented District Response Required: Yes</p> |

Department of Education Findings:

Based upon the review of documentation and student records and interviews, the district does not have a formal mechanism in place to identify the type of language assistance required by parents/guardians with limited English language skills. Further, the district has not translated the school handbooks, general announcements, informational materials, notices, admission application and materials for parents/guardians with limited English language skills, when necessary and appropriate.

| CRITERION NUMBER | TITLE 1 III. PARENTAL AND COMMUNITY INVOLVEMENT |
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| | Legal Standard |
| TI 21 | <p><u>School District Requirements:</u></p> <ol style="list-style-type: none"> 1. Title I programs, activities, and procedures are planned and implemented providing meaningful consultation with parents of participating children. 1118(a)(1) 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) 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 4. The district builds schools' and parents' capacity for strong parental involvement. 5. Title I parental involvement services are integrated with other programs' |

| CRITERION NUMBER | TITLE 1 III. PARENTAL AND COMMUNITY INVOLVEMENT |
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| | Legal Standard |
| | <p>parental involvement strategies at the school and district level.</p> <p>6. The district conducts,</p> <p>7. 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"> a. Status of school identified for school improvement b. Notice of teacher qualifications and right of parent to inquire c. Notice, if applicable, that students are taught by non- highly qualified teachers for more than four weeks. <p style="text-align: center;">1118(d)(3)(B)</p> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | Legal Standard |
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| TI 22 | <p>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.).</p> <p>1118(e)(2) NCLB</p> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | Legal Standard |
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| TI 23 | <p><u>School Requirements:</u></p> <p>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</p> <p>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.</p> |

| CRITERION NUMBER | | | | |
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| | Legal Standard | | | |
| | <p>3.</p> <p>4.</p> | <p>1118(b)(1) NCLB</p> <p>The school implements the following parent requirements:</p> <ul style="list-style-type: none"> a. Convenes an annual informational meeting at a time convenient for parents; 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.); c. Involves parents in an organized, ongoing, timely way in the planning, review, and improvement of school parental involvement policy and schoolwide programs; d. Provides parents with timely information about Title I programs, descriptions, and an explanation of the Title I curriculum and assessment procedures; and e. Provides parents with materials and training to improve their children's achievement. <p>1118 (c)(1)-(4); 1118 (e)(2) NCLB</p> <p>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> | | |
| | Rating: Implemented | District Response Required: | No | |

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:

- Civil Rights Methods of Administration (MOA) (Report Issues MOA 8-9)
 - Title I (Report Issues # TI 24-28)

| CRITERION NUMBER | CIVIL RIGHTS METHODS OF ADMINISTRATION IV. CURRICULUM AND INSTRUCTION |
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| | Legal Standard |
| MOA 8 | <p>Accessibility of extracurricular activities Extracurricular activities sponsored by the district are nondiscriminatory in that:</p> <ol style="list-style-type: none"> the school provides equal opportunity for all students to participate in intramural and interscholastic sports; 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. <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> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
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| | Legal Standard |
| MOA 9 | <p>Hiring and employment practices of prospective employers of students</p> <ol style="list-style-type: none"> 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. 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. <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> |
| | Rating: Partially Implemented District Response Required: Yes |

Department of Education Findings:

The district has just begun the process of implementing the above requirement for the 03-04 school year. The documentation indicated that only three employers from the list submitted, had signed the statement of assurance regarding the district's non-discrimination policy.

| CRITERION NUMBER | TITLE 1 IV. CURRICULUM AND INSTRUCTION |
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| | Legal Standard |
| TI 24 - TAS | The district implements effective instructional strategies that are based on scientifically-based research that: <ul style="list-style-type: none"> a. give primary consideration to extended learning time; b. help provide an accelerated, high quality curriculum; and c. minimize the removal of students from the classroom during regular hours. <p>1115(c)(1)(C) NCLB</p> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
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| | Legal Standard |
| TI 25 – TAS/SWP | 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. <p>1114(b)(1)(B)(ii)(II); 1115(c)(1)(C)(i) NCLB</p> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
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| | Legal Standard |
| TI 26 - SWP | 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: <ul style="list-style-type: none"> a. teachers, principals, and other staff, and where appropriate, b. pupil services personnel, c. parents, and d. secondary school students, if applicable. <p>1114(b)(2)(B)(ii) NCLB</p> |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:
The district has a targeted assistance program.

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| CRITERION NUMBER | |
| | Legal Standard |
| TI 27 - SWP | 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 |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

The district has a targeted assistance program.

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| CRITERION NUMBER | |
| | Legal Standard |
| TI 28- SWP | 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 |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

The district has a targeted assistance program.

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 (Focus Areas: Graduation Rates of Disabled Students & Discipline of Students with Disabilities)
 - Civil Rights Methods of Administration (MOA)
(Report Issues MOA 10 –17A)
 - Title I (Report Issues # TI 29)

**FOCUS AREA:
Graduation Rates Of Students With Disabilities (SWD) Verses Non-Disabled Peers**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

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| SE 48 | <p>FAPE (Free, appropriate, public education): Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education</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. Programs, services and activities include, but are not limited to:</p> <ol style="list-style-type: none"> 11. art and music <li style="background-color: #90EE90;">12. vocational education, industrial arts, and consumer and homemaking education 13. work study and employment opportunities 14. counseling services available at all levels in the district 15. health services 16. transportation 17. recess and physical education, including adapted physical education 18. athletics and recreational activities 19. school-sponsored groups or clubs 20. meals <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border-top: 1px solid black; border-bottom: 1px solid black;">State Regulations</td> <td style="border-top: 1px solid black; border-bottom: 1px solid black;">Federal Requirements</td> </tr> <tr> <td>28.06(5)</td> <td>34 CFR 300.121; 300.300-313</td> </tr> </table> | State Regulations | Federal Requirements | 28.06(5) | 34 CFR 300.121; 300.300-313 |
| State Regulations | Federal Requirements | | | | |
| 28.06(5) | 34 CFR 300.121; 300.300-313 | | | | |

Data Collection, Planning and Validation:

All students in the Class of 2004 have passed the MCAS and are eligible to graduate. In the Class of 2003, all students except for one student passed the MCAS and graduated. This student received a certificate of completion of the district’s requirements. Students who do not receive diplomas are eligible to continue their education and related services through the school and through the sending community.

Strengths of District’s Practices for this Focus Area:

The district conducts MCAS camps after school and during the summer for students in need of remediation. During the administration of the MCAS, there are significant efforts made to group students to ensure optimal test taking conditions for every student. In the spring of 2003, there were 43 groupings of students established. The Administrative Team uses technology (Test Wiz) and data to identify student needs resulting from the MCAS assessments. The analysis of the results assists in the shaping of instructional strategies to promote more effective and targeted provision of remediation to students.

Compliance Status:

The review of the DOE data and the district documentation indicated that there is full participation of students with disabilities in the MCAS. The student record review validated the provision of accommodations to students with disabilities to ensure full access and ability to participate in the MCAS

**FOCUS AREA:
Discipline**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

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| SE 43 | <p>Behavioral interventions For a student whose behavior impedes their learning or the learning of others, the Team considers the student’s behavior including positive behavioral interventions, ability to follow school discipline codes, any needed code modifications and the possible need for a functional behavioral assessment.</p> <p>State Regulations</p> | <p>Federal Requirements 34 CFR 300.346</p> |
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| SE 44 | <p>Procedure for recording suspensions The district has a procedure to record the number and duration of suspensions, including any suspensions from any part of the student’s IEP program (including transportation).</p> <p>State Regulations</p> | <p>Federal Requirements 34 CFR 300.121(d)(2)</p> |
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| SE 45 | <p>Procedures for suspension up to 10 days and after 10 days: General requirements</p> <ol style="list-style-type: none"> 1. All students, including eligible students with disabilities, receive prior written notice regarding the school’s Code of Conduct. 2. The school’s Code of Conduct includes required procedural safeguards such as opportunity for a hearing (per Goss v. Lopez). 3. Any eligible student may be suspended up to 10 days in any school year without implementation of procedures described in criterion SE 46 below. 4. After a student with special needs has been suspended for 10 days in any school year, during any subsequent removal the public school provides sufficient services for the student to continue to receive a free and appropriate public education. 5. The school provides additional procedural safeguards for students with disabilities prior to any suspension beyond 10 consecutive days or more than 10 cumulative days (if there is a pattern of suspension) in any school year. <p><i>(See related requirements under the Civil Rights portion of the Coordinated Program Review Procedures — Criterion MOA 17.)</i></p> <p>State Requirements M.G.L. Ch. 76, Sections 16-18 and Ch. 71, Section 37 H</p> | <p>Federal Requirements 34 CFR 300.519-300.529</p> |
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| SE 46 | <p>Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district</p> <ol style="list-style-type: none"> 1. A suspension of longer than 10 consecutive days or a series of suspensions that are shorter than 10 consecutive days but constitute a pattern are considered to represent a change in placement. 2. Prior to a suspension that constitutes a change in placement of a student with disabilities, the Team convenes <ol style="list-style-type: none"> a. to develop or review a functional behavioral assessment of the student’s behavior to modify a behavior intervention plan or develop an assessment plan; b. to identify appropriate alternative educational setting(s); and c. to determine the relationship between the disability and the behavior - “a manifestation decision” (Is IEP appropriate? Is placement appropriate? If there was a behavior plan, was it implemented? Does student understand impact and consequences of his/her behavior? Can student control behavior?). 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. 4. Regardless of the manifestation determination, the district may place the student in an interim alternative educational setting (as determined by the Team) for up to 45 days <ol style="list-style-type: none"> a. if the behavior involves weapons or illegal drugs or another controlled substance while at school or a school function; or b. if the district provides evidence that the student is “substantially likely” to injure him/herself or others and a hearing officer orders the alternative placement; and c. the interim alternative education setting enables the student to continue in the general curriculum, to continue receiving services identified on the IEP, and provides services to address the problem behavior. 5. If the Team determines that the behavior <u>IS</u> a manifestation of the disability, then the district takes steps (with the consent of the parent) to correct the IEP, the placement, or the behavior intervention plan. 6. The school district provides written notice to the parent of all rights to appeal and to an expedited hearing. If the parent chooses to appeal, during the appeal the student stays put in the placement on the last accepted IEP or the interim alternative placement, unless the parent and the school district agree otherwise. <p>State Regulations</p> <p>Federal Requirements 34 CFR 300.519-300.528</p> |
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| SE 47 | <p>Procedural requirements applied to students not yet determined to be eligible for special education</p> <ol style="list-style-type: none"> 1. If, prior to the disciplinary action, a district had knowledge that the student may be a student with a disability, then the district makes all protections available to the student until and unless the student is subsequently determined not to be eligible. The district may be considered to have prior knowledge if: <ol style="list-style-type: none"> a. The parent had expressed concern in writing; or b. The parent had requested an evaluation; or c. School district staff had expressed concern that the student had a disability. 2. If the district had no reason to consider the student disabled, and the parent requests an evaluation subsequent to the disciplinary action, the district must have procedures to conduct an expedited evaluation to determine eligibility. If the student is found eligible, then he/she receives all procedural protections subsequent to the finding of eligibility. 3. The school district has developed procedures consistent with federal requirements to expedite evaluations. <p>State Regulations Federal Requirements 20 U.S.C. Chapter 33, Section 1415(k)</p> |
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Data Collection, Planning and Validation:

The Review Team based the findings upon the review of district documentation and data, student records and interviews.

Strengths of District’s Practices for this Focus Area:

Interviews indicated that school personnel are very attuned to maintaining an in-school climate that is safe, respectful and responsive to the diverse educational and social-emotional needs of the student population. The school strives to promote learning environments where all students can strive to develop and achieve to their maximum potential while working through the competency levels at their own rate of accomplishment. All students receive mid-term academic and vocational progress reports and report cards based upon a tri-semester school year. The Behavioral Resource Center, the School Based Health Center and the school nurses provide invaluable resources to the school community regarding the implementation of preventive and proactive measures to address social and health problems that emerge and erupt within the school environment.

Compliance Status:

The review of the high school handbook demonstrates consistency with the federal and state regulations. The school uses the IPASS system to track infractions to the discipline code, incident reports and suspensions. Administrative and guidance personnel have access to the IPASS system and can monitor and track emerging patterns regarding violations of the discipline code by individual students. The school handbook clearly indicates the administrative actions and consequences for infractions and descriptions for the three levels of infractions. All school personnel are knowledgeable of the discipline system and the hierarchy of actions taken for the different levels of infractions. The Dean of Students is viewed as the primary administrator responsible for the tracking and monitoring of the discipline system.

The Review Team noted that students have access to the Behavioral Resource Center, school adjustment counselor, school psychologist, nurses and guidance counselors for the provision of counseling and therapeutic supports. The Behavioral Resource Center is integral to the social-emotional support system provided to students and there is documentation of student visits and the interventions taken.

The student record review and interviews showed evidence that IEP Teams convened to address a student's need for increasing levels of behavioral intervention and for the purpose of conducting a manifestation determination, for students with disabilities who received suspensions that exceeded 10 days in a school year. The documented Functional Behavioral Assessment was well written and addressed the information necessary for the Team to implement the manifestation determination process.

Interviews and documentation showed that there is an extensive network of communication and collaboration between the special education liaison and an individual student's teachers when a student on an IEP is exhibiting behaviors that impact school performance and progress towards annual IEP goals and grade level requirements. Guidance personnel are responsible for the oversight and monitoring regarding social-emotional and behavioral issues for regular education students and for students on Section 504 Plans. However, the above process does not have structured guidelines or formalized procedures to ensure that there is regular oversight at key junctures and that the interventions provided are documented and tracked. The student record review showed that timely actions were not always taken to intervene when a student was not progressing towards annual IEP goals, whose behavior is impacting performance in academic courses and the vocational program and/or exhibiting repeated violations of the discipline code.

The Review Team has concerns regarding the lack of a formalized process and procedures in place to trigger the implementation of appropriate procedures consistent with the federal requirements to ensure a coordinated behavioral response to the provision, the tracking and the monitoring of interventions for individual students. The Behavioral Intervention Plans that were documented in the student records did not provide sufficient information regarding a plan and/or protocol developed to address the student's behavioral and social-emotional needs. The prescribed behavioral interventions were, in some cases, student and parent based rather than school based regarding the responsibility for the maintaining and monitoring of the student's behavior in areas where the student was having continuing issues as reflected in the mid-year progress reports, teacher assessments and student's performance. Some of these areas were as follows: maintenance of behavior, attendance, missed work assignments, completion of homework, utilization of procedures to seek therapeutic supports and self-advocacy.

Although the Review Team recognizes the need for student ownership at this grade level in preparation for post-secondary transition, it does not override the district's responsibility to implement strategies and oversight of the intervention plan's success. The Behavioral Intervention Plans did not always indicate the key personnel responsible for the oversight and monitoring of the plan across the academic and vocational curriculum. The Review Team has concerns regarding the fact that students with disabilities who have been suspended for 10 days or more are not always provided with a manifestation determination **prior** to a suspension that would result in a change of placement.

Suggestions For Improved Results:

- Develop systemic interventions to address the needs and progress of at risk students
- Research samples and models of Behavioral Intervention Plans
- Review function of Student Review Team. Revise referral and follow-up process, procedures and timeframes. Disseminate the revised process and procedures to staff
- Develop plan for oversight and monitoring, and designate key personnel responsible, for the ongoing implementation of the monitoring process across the administrative, vocational, academic, vocational and guidance departments.
- Change model for service delivery management of Section 504 process

| CRITERION NUMBER | CIVIL RIGHTS METHODS OF ADMINISTRATION V. STUDENT SUPPORT SERVICES |
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| | Legal Standard |
| MOA 10A | <p>Handbooks and codes of conduct</p> <ol style="list-style-type: none"> 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. 2. Student codes of conduct contain: <ol style="list-style-type: none"> a) procedures assuring due process in disciplinary proceedings and b) appropriate procedures for the discipline of students with special needs and students with Section 504 Accommodation Plans. 3. Handbooks and codes of conduct reference M.G.L. c. 76, s. 5 and contain: <ol style="list-style-type: none"> 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; b) the school's procedure for accepting, investigating and resolving complaints alleging discrimination or harassment; and c) the disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred. <p>Section 504; M.G.L. c. 71, s. 37H; 603 CMR 26.08</p> |
| | <p>Rating: Implemented District Response Required: No</p> |

| CRITERION NUMBER | |
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| | Legal Standard |
| MOA 11A | <p>Designation of liaison/coordinator(s); grievance procedures</p> <ol style="list-style-type: none"> 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. 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. <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> |
| | <p>Rating: Implemented District Response Required: No</p> |

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 12A | <p>Annual and continuous notification concerning nondiscrimination and coordinators</p> <ol style="list-style-type: none"> 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 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. 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. 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>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> |
| | Rating: Implemented District Response Required: No |

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 13 | <p>Availability of information and counseling on general curricular and occupational/vocational opportunities</p> <p>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> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
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| | Legal Standard |
| MOA 14 | <p>Counseling and counseling materials free from bias and stereotypes 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"> 1. encourage students to consider programs of study, courses, extracurricular activities, and occupational opportunities on the basis of individual interests, abilities, and skills; 2. examine testing materials for bias and counteract any found bias when administering tests and interpreting test results; 3. communicate effectively with limited-English-proficient and disabled students and facilitate their access to all programs and services offered by the district; 4. provide limited-English-proficient students with the opportunity to receive counseling in their primary language; 5. support students in educational and occupational pursuits that are nontraditional for their gender. <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> |
| | <p>Rating: Implemented District Response Required: No</p> |

| CRITERION NUMBER | |
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| | Legal Standard |
| MOA 15 | <p>Non-discriminatory administration of scholarships, prizes and awards 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> |

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

Department of Education Findings:

Based upon a review of documentation, some of the district’s scholarships, prizes and awards use a student’s GPA as one of the criteria during the selection process. The review of the Program of Studies indicated that Level 3 Classes are for students on IEPs and that the basis of the determination of GPA for students taking Level 3 Classes is to subtract 5 points for each class taken when calculating the student’s GPA.. The use of a student’s GPA places restrictions on the access of students placed in Level 3 classes to being considered in a fair and equitable manner for the scholarships, prizes and awards that use the GPA as a criterion.

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| CRITERION NUMBER | |
| | Legal Standard |
| MOA 16 | <p>Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion</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> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
|------------------|--|
| | Legal Standard |
| MOA 17A | <p>Use of physical restraint on any student enrolled in a publicly-funded education program</p> <ol style="list-style-type: none"> 1. The district has developed and implemented staff training at least annually on the use of restraint consistent with regulatory requirements. 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. 2. The district administers physical restraint on students only when needed to protect a student and/or a member of the school community from imminent, serious, physical harm. The district implements restraint procedures consistent with Department of Education regulations in order to prevent or minimize any harm to the student as a result of the use of physical restraint. 3. The district has developed written procedures regarding appropriate responses to student behavior that may require immediate intervention. Such procedures are annually reviewed and provided to school staff and made available to parents of enrolled students. 4. The district has developed and implemented reporting requirements and procedures for administrators, parents and the Department of Education consistent with the regulations. 5. The district has developed and implemented any applicable individual waiver procedures consistent with the regulations. <p>M.G.L. c. 71, s. 37G; 603 CMR 46.00</p> |
| | <p>Rating: Partially Implemented District Response Required: Yes</p> |

Department of Education Findings:

The documentation indicated that the district has conducted staff training. However, interviews indicated that all staff were not aware of the regulatory requirements, the school's process and procedures and the personnel responsible for the administration of physical restraint when necessary. No documentation was submitted regarding the personnel who have received the sixteen-hour training in the administration of physical restraint.

| CRITERION NUMBER | TITLE 1 V. STUDENT SUPPORT SERVICES |
|------------------|--|
| | Legal Standard |
| TI 29 | <ol style="list-style-type: none"> 1. Appropriate officials from private schools are informed and consulted about the availability of Title I services. 2. Written affirmation is obtained and signed by officials of each participating private school, confirming that required consultation has occurred. 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. <p>1120 NCLB</p> |

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| CRITERION NUMBER | TITLE 1 V. STUDENT SUPPORT SERVICES |
| | Legal Standard |
| | Rating: Not Applicable District Response Required: No |

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 (Focus Area: Pre-Referral, Instructional Support System)
- Civil Rights Methods of Administration (MOA) (Report Issues MOA 18A-21)
 - Title I (Report Issues # TI 30-31)

**SPECIAL EDUCATION FOCUS AREA:
Pre-referral**

The district practices in this focus area were monitored for compliance and outcomes with the following regulatory standards:

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| SE 50 | <p>Responsibilities of the School Principal and Administrator of Special Education</p> <p><u>Principal:</u></p> <ol style="list-style-type: none">1. <u>Instructional support.</u> The principal in each of the district's schools promotes instructional practices responsive to student needs and ensures that adequate instructional support is available for students and teachers. Instructional support includes remedial instruction for students, consultative services for teachers, availability of reading instruction at the elementary level, appropriate services for linguistic minority students, and other services consistent with effective educational practices and the requirements of M.G.L. c. 71B, §2. The principal consults with the Administrator of Special Education regarding accommodations and interventions for students. Such efforts and their results are documented and placed in the student record. Additionally, when an individual student is referred for an evaluation to determine eligibility for special education, the principal ensures that documentation on the use of instructional support services for the student is provided as part of the evaluation information reviewed by the Team when determining eligibility.2. <u>Curriculum Accommodation Plan.</u> The principal implements a curriculum accommodation plan developed by the district's general education program to ensure that all efforts have been made to meet the needs of diverse learners in the general education program. The plan assists the regular classroom teacher in analyzing and accommodating diverse learning styles of all children in the regular classroom and in providing appropriate services and support within the regular education program including, but not limited to, direct and systemic instruction in reading and provision of services to address the needs of children whose behavior may interfere with learning. The Plan includes teacher training in (1) analyzing and accommodating diverse learning styles of all students in order to achieve an objective of inclusion in the regular classroom of students with diverse learning styles; (2) methods of collaboration among teachers, paraprofessionals and teacher assistants to accommodate such styles; and (3) training in the provision of pre-referral services within regular education, teacher mentoring and collaboration and parental involvement.3. <u>Coordination with special education.</u> The principal with the assistance of the Administrator of Special Education coordinates the delivery and supervision of special education services within each school building.4. <u>Educational services in home or hospital.</u> Upon receipt of a physician's written order verifying that any student enrolled in a public school or placed by the public school in a private setting must remain at home or in a hospital on a day or overnight basis, or any combination of both, for medical reasons and for a period of not less than fourteen school days in any school year, the principal arranges for provision of educational services in the home or hospital. Such services are provided with sufficient frequency to allow the student to continue his or her educational program, as long as such services do not interfere with the medical needs of the student. |
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| | <p>The principal coordinates such services with the Administrator for Special Education for eligible students. Such educational services are not be considered special education unless the student has been determined eligible for such services, and the services include services on the student’s IEP.</p> <p><u>Administrator of Special Education:</u></p> <p>5. The school district has an appointed person to be its Administrator of Special Education. The Administrator supervises all special education for the school district and ensures compliance with all federal and state special education laws. As appropriate, and in accordance with the requirements of M.G.L. c.71B, §3A, the Administrator may designate other school district personnel to carry out some of the duties of the Administrator.</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">State Regulations</td> <td style="width: 50%;">Federal Requirements</td> </tr> <tr> <td>28.03(3)</td> <td></td> </tr> <tr> <td>Chapter 71, Section 38Q and 38Q ½</td> <td></td> </tr> </table> | State Regulations | Federal Requirements | 28.03(3) | | Chapter 71, Section 38Q and 38Q ½ | |
| State Regulations | Federal Requirements | | | | | | |
| 28.03(3) | | | | | | | |
| Chapter 71, Section 38Q and 38Q ½ | | | | | | | |

Data Collection, Planning and Validation:

The Review Team based the findings upon the review of district documentation, data, the District Curriculum Accommodation Plan, student records and interviews.

Strengths of District’s Practices for this Focus Area:

The school has increased their structured learning time and established a 193-day school year calendar. Interviews reflected the thoughtfulness and analysis that occurs among administrative, teaching and guidance personnel to ensure that the cross curriculum initiatives and support programs are responsive to the diverse learning and social needs of the student population.

The Review Team recognizes the successful implementation of the following initiatives which have enhanced and expanded the options available for all students and staff: MCAS camps and support programs, after school help, teacher/teacher program, the Jason Project, Behavioral Resource Center, School-based Health Center, competency-based counseling and vocational programs, the reading program, school-wide professional development days and the revamped course and shop schedule.

The administration is highly accessible to the teaching and guidance personnel. The administrators engage in a high level of coordination and cooperation to maintain the smooth and effective integration of the vocational, academic and guidance programs, support services and cross curriculum efforts in the areas of reading, math, writing, study strategies and respect.

An educational community has been created that engenders close collaboration, ongoing communication, consultation and partnerships to ensure that the diverse needs of all students and the professional needs of staff are met. The school community affords students equal opportunity, access and the choice to succeed and achieve through the wide spectrum of academic, vocational, nonacademic and extracurricular programs and support systems.

Compliance Status:

The school has developed and implemented an instructional support plan that clearly delineates instructional practices to be provided across the academic and vocational curriculum, the personnel responsible for the implementation of the above practices and the materials and tools used to review and to monitor the implementation. The District Curriculum Accommodation Plan delineates the services and supports to be provided within regular education programs, including the areas of reading and behavior intervention; assistance for classroom teachers in analyzing and accommodating diverse learning styles; professional development opportunities; mentoring program; parental involvement, training and outreach.

Through a review of records and documentation the Review Team validated that the district does have a Student Review Team (SRT) in place. Interviews indicated that the school revamped the prior model regarding its Student Support Team and developed a new model and procedures in the current school year. The Student Review Team has representation from guidance, counseling, administration, and regular and special education. There are documents used to record information regarding the referral and review of students as well as meeting activities. The student folders reviewed by DOE contained the student's grades, MCAS scores, and information regarding the exploratory period and attendance history.

Through a review of the records and documentation, the Review Team has concerns regarding the inconsistency of documentation of initial referral forms for students referred to the SRT. There was no documentation of follow-up reviews for students and a lack of evidence of teacher referrals for students to the SRT who were eligible to be referred in accordance with the guidelines in the school handbook. Based on the Review Team's review of a limited sample of records, it was not evident how the SRT process leads to referrals of students for further evaluation and/or an increased level of intervention when there was a danger of continued failure and not being promoted in the next school year. Interviews reflected that teaching and guidance personnel are more apt to continue to network and collaborate with the student's guidance counselor or special education liaison for ongoing issues regarding the above students rather than referring them to the SRT for a more formalized, coordinated response regarding interventions and strategies. The Review Team's review of the existing eligibility for the referral to the SRT process as delineated in the school handbook limits the early identification and access for referral of students with a variety of issues. There is a tendency for students to be referred and a coordinated response regarding actions to be taken by all teaching, guidance and vocational personnel involved with the student from between the second mid-term progress report and the end of the second semester's report card and not earlier.

Although the Review Team did validate the existence of the district's process for implementing Section 504 Plans, concerns were raised regarding the consistent oversight of the implementation and monitoring of the 504 Plans, specifically as they relate to academic and behavioral accommodations, supports and services for students who were failing and in danger of not being promoted for the next school year. The review of Section 504 Plans showed that accommodations and supports, in some cases, were student and/or parent based rather than fully placed upon the school district as a responsibility to ensure the provision of a free appropriate public education to students as required under Section 504.

Suggestions For Improved Results:

- Development of an overall plan to establish a coordinated formalized response for students in need of interventions and strategies and to ensure a continuum of response that is linked and integrated across the school's support services and programs. The plan would address the implementation of all types of interventions and processes system-wide including but not limited to Section 504 Plans, Behavioral Intervention Plans, IEP progress report reviews, discipline issues and referral to the Student Review Team
- Review of the requirements regarding documentation of the Student Review Team process
- In-service staff training regarding the function of the Student Review Team and an understanding of the continuum of responses to be implemented for students in need of interventions and strategies system-wide.

| CRITERION NUMBER | CIVIL RIGHTS METHODS OF ADMINISTRATION VI. FACULTY, STAFF AND ADMINISTRATION |
|-------------------------|---|
| | Legal Standard |
| MOA 18A | <p>School district employment practices 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 recruitment is aimed at reaching all groups, including members of linguistic, ethnic, and racial minorities, females and males, and persons with disabilities.</p> <p>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</p> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
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| | Legal Standard |
| MOA 19 Reserved | |

| CRITERION NUMBER | |
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| | Legal Standard |
| MOA 20 Reserved | |

| CRITERION NUMBER | |
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| | Legal Standard |
| MOA 21 | <p>Staff training regarding civil rights responsibilities The district provides in-service training for all school personnel at least annually regarding civil rights responsibilities, including the prevention of discrimination and harassment on the basis of students' race, color, sex, religion, national origin and sexual orientation and the appropriate methods for responding to it in the school 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> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | TITLE 1 VI. FACULTY, STAFF AND ADMINISTRATION |
|-------------------------|--|
| | Legal Standard |
| TI 30 | <ol style="list-style-type: none"> 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. 2. Where applicable, the district's Title IIA grant application describes how it will use these funds to meet the requirements of section 1119. <p><u>Implementation Guidance:</u></p> <ol style="list-style-type: none"> 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"> 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 objective uniform standard of evaluation. 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. c. The above requirements apply to Title I teachers in targeted assistance programs. In schoolwide programs, the above requirements apply to all teachers in the school. 2. All paraprofessional staff providing Title I services must meet the following: <ol style="list-style-type: none"> 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); b. Existing paraprofessional staff (hired prior to January 8, 2002): working to satisfy requirements by 2006; and c. All paraprofessional staff: must have earned a secondary high school diploma. |

| CRITERION NUMBER | TITLE 1 VI. FACULTY, STAFF AND ADMINISTRATION |
|------------------|---|
| | Legal Standard |
| | <p>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 all instructional paraprofessionals in a schoolwide program.</p> <p>e. Exempt from the above requirements are paraprofessionals who serve primarily as translators or work solely on parental involvement activities.</p> <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> |
| | <p>Rating: Implemented District Response Required: No</p> |

| CRITERION NUMBER | |
|------------------|--|
| | Legal Standard |
| TI 31 | <p>Professional Development</p> <ol style="list-style-type: none"> 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. <p>1119(k)(1) NCLB 2122(c)(1)(2) NCLB</p> |
| | <p>Rating: Not Applicable District Response Required: No</p> |

Department of Education Findings:

Documentation and interviews indicate that all paraprofessionals possess a bachelor's degree.

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:

- Civil Rights Methods of Administration (MOA) (Report Issues MOA 22-23)

| CRITERION NUMBER | CIVIL RIGHTS METHODS OF ADMINISTRATION VII. SCHOOL FACILITIES |
|-------------------------|---|
| | Legal Standard |
| MOA 22 | <p>Accessibility of district programs and services for students with disabilities 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> |
| | <p>Rating: Implemented District Response Required: Yes</p> |

Department of Education Findings:

The school building is currently undergoing extensive reconstruction and renovation that will address the existing accessibility issues upon completion.

| CRITERION NUMBER | Legal Standard |
|-------------------------|---|
| MOA 23 | <p>Comparability of facilities 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"> 1. separate facilities for disabled, limited-English-proficient or pregnant students that are comparable to the facilities for other students in the district; 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. <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> |
| | <p>Rating: Implemented District Response Required: Yes</p> |

Department of Education Findings: *The school building is currently undergoing extensive reconstruction and renovation that will address the existing comparability issues upon completion.*

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:

- Civil Rights Methods of Administration (MOA) (Report Issues MOA 24-25)
 - Title I (Report Issues # TI 32-38)

| CRITERION NUMBER | CIVIL RIGHTS METHODS OF ADMINISTRATION VIII. PROGRAM PLAN AND EVALUATION | |
|-------------------------|---|---------------------------------------|
| | Legal Standard | |
| MOA 24 | <p>Curriculum review process 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> | |
| | Rating: Implemented | District Response Required: No |

| CRITERION NUMBER | | |
|-------------------------|---|--|
| | Legal Standard | |
| MOA 25 | <p>Institutional self-evaluation 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> | |
| | Rating: Partially Implemented | District Response Required: Yes |

Department of Education Findings:

The school did not provide written documentation regarding the annual evaluation of its civil rights policies, procedures and programs The school has recently developed a 3-year plan to analyze its policies and programs.

| CRITERION NUMBER | TITLE 1 VIII. PROGRAM PLAN AND EVALUATION |
|------------------|--|
| | Legal Standard |
| TI 32 | 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 |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
|------------------|--|
| | Legal Standard |
| TI 33 | 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 |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
|------------------|---|
| | Legal Standard |
| TI 34 | 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 |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

The district school is not “in need of improvement”.

| CRITERION NUMBER | |
|-------------------------|--|
| | Legal Standard |
| TI 35 | <p>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.</p> <p>1116(b)(3)(D)</p> |
| | <p>Rating: Not Applicable District Response Required: No</p> |

Department of Education Findings:

The district school is not “in need of improvement”.

| CRITERION NUMBER | |
|-------------------------|--|
| | Legal Standard |
| TI 36 | <p>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.</p> <p>1116(b)(3)(A)(iii)(I) NCLB</p> |
| | <p>Rating: Not Applicable District Response Required: No</p> |

Department of Education Findings:

The district school is not “in need of improvement”.

| | |
|-------------------------|---|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 37 | <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> |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

The district school is not “in need of improvement”.

| | |
|-------------------------|---|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 38 | <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"> a. Continues to make the choice to transfer option available to students; 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; c. To provide technical assistance to such schools. <p>1116(b)(5) and 1116 (e) NCLB; 200.46 (4) and (5)</p> |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

The district school is not “in need of improvement”.

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:

- Title I (Report Issues # TI 39-40 General Requirements and
 - TI 1-18 Fiscal Requirements)

| CRITERION NUMBER | TITLE 1 IX. RECORD KEEPING – General Requirements |
|-------------------------|--|
| | Legal Standard |
| TI 39 | <ol style="list-style-type: none"> 1. The district has submitted all required reports to the Department including the district Title I Plan/Application and Performance and Achievement Report. 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. 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>1113; 1116 (c)(1)(B) NCLB</p> |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
|-------------------------|--|
| | Legal Standard |
| TI 40 | <p>Federal Title I Grant:</p> <ol style="list-style-type: none"> 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. 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, 3. Appropriate local administrators monitor the grant in an ongoing manner to ensure its full implementation as the Department has approved it. |
| | Rating: Implemented District Response Required: No |

| | |
|-------------------------|---|
| CRITERION NUMBER | TITLE 1 |
| | IX. RECORD KEEPING – FISCAL REQUIREMENTS |
| | I. Maintenance of Effort |
| | Legal Standard |
| TI 1 | The maintenance of effort fiscal test is of local and state expenditures, <i>not</i> of Title I or other federal expenditures. 1120A(a); 9521 NCLB |
| | Rating: Implemented District Response Required: No |

| | |
|-------------------------|--|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 2 | 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. 1120A(a); 9521(a) NCLB |
| | Rating: Implemented District Response Required: No |

| | |
|-------------------------|--|
| CRITERION NUMBER | |
| | II. Comparability |
| | Legal Standard |
| TI 3 | 1. Documentation of the district’s Comparability Report demonstrates annual compliance with the comparability requirement and is documented at least biennially. 1120A(c)(3)(B) NCLB 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. 1120A(c) NCLB 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. 1120A(c)(1)(A) NCLB 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. 1120A(c)(1)(B) NCLB |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
|------------------|--|
| | Legal Standard |
| TI 4 | <p>1. The district has established and implemented the following requirements:</p> <ul style="list-style-type: none"> a. a district-wide salary schedule; b. a policy to ensure equivalence among schools in teachers, administrators, and other staff; and c. a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. <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. 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. Title I Policy Guidance IASA</p> |
| | <p>Rating: Not Applicable District Response Required: No</p> |

Department of Education Findings:

The district is a one school district.

| CRITERION NUMBER | |
|------------------|--|
| | Legal Standard |
| TI 5 | <p>1. Other measures, such as student/instructional staff ratios or student/instructional staff salary ratios, are used to demonstrate comparability.</p> <ul style="list-style-type: none"> 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. b. Student/staff salary ratios: The Title I school averages are at least 90% of the average of non-Title I schools. c. Staff salary differentials for years of employment are not used in implementing requirements under criterion TI 5 (b) above. <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. Title I Policy Guidance IASA</p> |
| | <p>Rating: Not Applicable District Response Required: No</p> |

Department of Education Findings:

The district is a one school district

| | |
|-------------------------|--|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 6 | 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. 1120A(d) NCLB |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

The district does not use the exclusion provision.

| | |
|---|--|
| CRITERION NUMBER | |
| | III. Supplement, Not Supplant |
| | Legal Standard |
| TI 7 [Applicable to Targeted Assistance Schools (TAS)] | The district is able to demonstrate that it uses Title I funds only to supplement and, 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 |
| | Rating: Implemented District Response Required: No |

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|---|---|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 8 [Applicable to TAS] | 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 |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | |
|--|---|
| | Legal Standard |
| <p>TI 9 [Applicable to Schoolwide Programs (SWP)]</p> | <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> |
| | <p>Rating: Not Applicable District Response Required: No</p> |

Department of Education Findings:

The district does not have any Title I school-wide program.

| CRITERION NUMBER | |
|---|--|
| | Legal Standard |
| <p>TI 10 (Exclusion)</p> | <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> |
| | <p>Rating: Not Applicable District Response Required: No</p> |

Department of Education Findings:

The district does not use the exclusion provision.

| | |
|-------------------------|--|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 11 | <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"> 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? 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. |
| | Rating: Implemented District Response Required: No |

| | |
|-------------------------|---|
| CRITERION NUMBER | |
| | IV. Other Fiscal Requirements |
| | Legal Standard |
| TI 12 | <p>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.</p> <p>EDGAR; OMB Circular/Cost Guidelines</p> |
| | Rating: Implemented District Response Required: No |

| | |
|-------------------------|--|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 13 | <p>The district has selected eligible schools in accordance with Title I requirements under this criterion.</p> <p>1113(a); 1113(b); 1113(c); NCLB</p> |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:
The district is a one school district.

| | |
|-------------------------|--|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 14 | 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 |
| | Rating: Implemented District Response Required: No |

| | |
|-------------------------|---|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 15 | The district has made appropriate reservations (set asides) on Form 2 in accordance with applicable NCLB requirements: a. Professional development – highly qualified staff b. Professional development – schools in need of improvement c. Choice-related transportation and supplementary services d. Parental involvement e. Homeless 1113(c)(2)(A); 1113(c)(3) NCLB |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

Documentation and interviews indicate that no reservations are needed..

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|-------------------------|---|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 16 | 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. 1113(a); 1113(c)(2)(A) NCLB |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

The district is a one school district.

| | |
|-------------------------|---|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 17 | The district has made private school allocations in accordance with Title I requirements. 1120(a); 1120(b); 1120(c) NCLB |
| | Rating: Not Applicable District Response Required: No |

Department of Education Findings:

The district is a regional vocational school.

| | |
|-------------------------|--|
| CRITERION NUMBER | |
| | Legal Standard |
| TI 18 | <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> <ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> a. Does the current year budget total agree with the district’s entitlement together with any carryover? If not, obtain explanation. b. Does the current year budget total agree with the total funds allocated on Form 1? If not, obtain explanation. 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 the school visit, determine whether the personnel are assigned and teaching the grades and subjects noted. 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>MADOE Title I Grant Application Instructions and Guidance</p> |
| | Rating: Implemented District Response Required: No |

**APPENDIX I:
NUTRITION PROGRAMS AND SERVICES**

Code of Federal Regulations:

7 CFR Parts: 210 National School Lunch Program

215 Special Milk Program for Children

220 School Breakfast Program

227 Nutrition Education and Training Program

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

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

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

Department of Education Findings:

One application, reflecting eligibility for one student, was approved in error. The name of the student was left with the school secretary for correction. A response and copies or correspondence with the parent(s) is still required as part of the corrective action. Fiscal action may be assessed for the error noted.

| CRITERION NUMBER | NUTRITION PROGRAMS AND SERVICES |
|------------------|--|
| | Legal Standard |
| NS 2 | Records indicate that lunches claimed for reimbursement within the school food authority contain food items/components as required by program regulations. 7 CFR 210.18 (g) (2) |
| | Rating: Implemented District Response Required: No |

| CRITERION NUMBER | NUTRITION PROGRAMS AND SERVICES |
|------------------|---|
| | Legal Standard |
| NS 3 | School Food Authorities account for all revenues and expenditures of their nonprofit school food service. In order to participate in the NSLP, the School Food Authority maintains records to demonstrate compliance with program requirements. Retention of these documents is for three years after the close of the fiscal year to which they pertain except in cases where audit findings are unresolved. 7CFR210.9 (a) (17); 210.14, 210.15 |
| | Rating: Partially Implemented District Response Required: Yes |

Department of Education Findings:

Technical assistance was provided in the following areas: Prepaid lunches must be claimed on the day served and not on the day pre-payment is received. In addition, a profit and loss statement should be prepared monthly using the recommended format provided to the business manager. The supplemental financial statement was also discussed and was revised by the business manager during the review to more accurately report data.

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

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

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

APPENDIX:II
SCHOOL DISTRICT PROFILE INFORMATION

The information which is provided in this Appendix was drawn from data supplied by the school district. The Department's visiting team carefully reviewed this data as part of its planning for the onsite visit and in preparing this Coordinated Program Review Report. This district-wide information, together with more detailed school building data, is periodically updated by the school district and is available in an ever current 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

| | |
|---|---|
| Approved Special Education Schools | 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. |
| Charter School | 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. |
| Collaborative | 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. |
| Collaborative Programs | Regardless of the size of the individual collaborative, each school provides programs that its member districts demand. |
| Private School | A non-publicly funded school that provides educational services directly to attending students. |
| Public School | Public schools are administered by a Public School District, and provide educational services directly to attending students. Expenses are paid by state appropriation. |
| Public School Districts | 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 appropriation. |

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

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