



The Commonwealth of Massachusetts Department of Education

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August 25, 2004

Dr. Mary Czajkowski, Superintendent
Agawam Public School
1305 Springfield Street
Feeding Hills, MA 01030

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

Dear Superintendent Czajkowski:

Enclosed is the Department's Coordinated Program Review Follow-up Monitoring Report together with findings regarding your district's Coordinated Program Review Mid-cycle Review. This report contains the Department's findings based on the onsite activities conducted in your school district to verify the implementation status and effectiveness of corrective steps taken in response to your Coordinated Program Review Report issued on February 7, 2002. This report also includes a report on the status of implementation for new state or federal special education requirements enacted since your district's last Coordinated Program Review.

While the Department of Education found certain noncompliance issues to be resolved, others were partially corrected, not addressed at all and/or the Department's onsite team identified new issues.

As the Department previously informed you, in cases where a district fails to fully and effectively implement a Corrective Action Plan proposed by your district and approved by the Department, the Department must then prepare a Corrective Action Plan for the district, which must be implemented without further delay. You will find these requirements for corrective action and further progress reporting included in the attached report together with any steps that must be taken by the district to fully implement new special education requirements. Please provide the Department with your written assurance that the Department's requirements for corrective action will be implemented by your school district within the timelines specified. Your statement of assurance must be submitted to the Department's Onsite Chairperson by **September 8, 2004**.

Your staff's cooperation throughout these Follow-up Monitoring activities is appreciated. Should

you require additional clarification of information included in our report, please do not hesitate to contact me at 413-284-0382.

Sincerely,

Alvin W. Morton, Department's Onsite Chairperson
Program Quality Assurance Services

John D. Stager, Administrator
Program Quality Assurance Services

cc: David P. Driscoll, Commissioner of Education
Mayor Richard A. Cohen, School Committee Chairperson
Mr. John Provost, Special Education Director
Martha H. Dodge, Education Liaison

Encl.: Follow-up Monitoring Report

**MASSACHUSETTS DEPARTMENT OF EDUCATION
COORDINATED PROGRAM REVIEW**

A G A W A M P U B L I C S C H O O L S

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

**Action Plan Submitted on March 29, 2002
Onsite Visit Conducted week of May 10-14, 2004
Date of this Report July 16, 2004**

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Mid-Cycle Special Education Requirements						
SE 1 Assessments are appropriately selected and interpreted for students referred for evaluation	Substantially Implemented	Student Records Description of district evaluation standards and procedures used for student evaluation and placement decisions. Staff interviews	The district has a variety of assessment tools and strategies available to evaluators in order to gather relevant functional and developmental information, including information provided by the			

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			parent.			
SE 2 Required and optional assessments	Substantially Implemented	Student records Current parent's rights notice	The district conducts required assessments, and optional assessments as recommended, for students referred for special education evaluations.			
SE 3 Special requirements for determination of specific learning disabilities	Not Substantially Implemented	Specific Learning Disability form within student records Description of district implementation practices regarding identification of students with specific learning disabilities Staff interviews	The Team implements the special requirements for determination of specific learning disabilities.	Not Fully Implemented	The Team did not consistently complete and/or completed inaccurately the Specific Learning Disability (SLD) Form for eligible students.	The district will provide training to special education staff, including Team Chairs, regarding the special requirements for determining specific learning disabilities (SLD) in students and appropriate completion of the SLD form. A copy of the training agenda and attendance sheet will be provided to the Department by January 15, 2005 . The district will provide a copy of five accurately

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						completed SLD forms to the Department by July 15, 2005 .
SE 5 Participation in general State and district-wide assessment programs	Substantially Implemented	Student records District guidelines for the participation of disabled students in the MCAS program District guidelines regarding the method of determining needed testing accommodations Staff interviews	The district ensures that 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. The district's IEP Teams designate how each student will participate and, if necessary, provide an alternate assessment.			

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SE 6 Determination of transition services	Not Substantially Implemented	Student records District continuous improvement plan Staff interviews	The Team, based upon the student's needs, determines the appropriate transition services for students. The district ensures that identified transition services are consistently implemented. Students, age 14 and above, are consistently invited to and attend Team meetings.	Not Fully Implemented	<p>The Team documents the student's desired outcomes within the vision statement e.g. exploration of post-secondary education options, attainment of personal goals, etc. However this information is not supported or expanded upon within IEP 3 (Age-Specific Considerations) and within IEP 8 (Additional Information).</p> <p>For example, if the student will explore his or her post-secondary education options, the IEP should contain a description of how and when this exploration will occur and who will be</p>	<p>The district will distribute a memo to all middle and high school special education staff, guidance counselors, Team Chairs, and psychologists regarding the determination of transition services and their required documentation within the IEP. It should be noted that transition services include all services provided to a student regardless of whether the student will be attending a vocational training program, day rehabilitation, or college. A copy of the memo will be provided to the Department by January 15, 2005.</p> <p>The district will provide a copy of five (5) IEP's that accurately document transition planning</p>

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					responsible i.e. guidance counselor.	discussions or transition services to the Department by July 15, 2005 .
SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority	Not Substantially Implemented	Student records Sample of notice to student and parents in applicable situations Staff interviews	The district, one year prior to the student reaching age eighteen, informs the student of his or her right at age 18 to make all decisions in relation to special education programs and services. Additionally, upon reaching the age of eighteen, the district implements procedures to obtain consent from the student to continue the student's special education program. Students, age 14 and above, are consistently invited to and attend Team meetings.	Not Fully Implemented	The Team does not consistently document, within the IEP and within the student's record, the discussion of transfer of rights at least one year before the student's age of majority and, upon reaching the age of eighteen, a record of the student's consent to continue the student's special education program.	The district draft a memo to all special education staff, guidance counselors, and school psychologists explaining the requirement to consistently document within the IEP and within the student's record, the discussion of transfer of rights at least one year before the student's age of majority and, upon reaching the age of eighteen, a record of the student's consent to continue the student's special education program. The memo may be combined with the memo for SE 6 and a copy provided to the Department by January 15, 2005 .

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						The district will provide a copy of 3-5 IEP's that document the discussion of transfer of rights at least one year before the student's age of majority; and a copy of 3-5 records in which a student, upon reaching the age of eighteen, consented to continue his/her special education program by July 15, 2005 .
SE 8 Evaluation Team composition	Not Substantially Implemented	Student records District continuous improvement plan Staff interviews	Evaluation Teams adhere to the mandated requirements for composition.	Not Fully Implemented	The district's regular education teachers do not routinely participate in Team Meetings.	The district must draft a memorandum, distribute it throughout the district, and provide a copy to the Department reminding all of its education personnel of the mandated requirements for Team composition for all Team Meetings. This requirement is due January 15, 2005 . Also, the district must provide the Department

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						with twenty completed Team meeting attendance sheets due by July 15, 2005 .
SE 9 Eligibility determination: Timelines for evaluation, immediate provision of IEP	Not Substantially Implemented	Student records	The district does conduct evaluations for eligibility determinations.	Not Fully Implemented	The district does not consistently convene a Team meeting, provide the parent with a proposed IEP and placement, or a written explanation of the finding of no eligibility within the mandated forty-five school working days from receiving written parental consent.	The district will draft and distribute a memo to special education staff, including Team Chairs, regarding timelines for provision of Team Meetings, IEPs to the parents, or a written explanation of the finding of no eligibility within forty-five school working days after receipt of the parent's written consent to evaluate. A copy of the memo will be provided to the Department by January 15, 2005 . The district will randomly select five IEPs and submit documentation that the IEP's were provided to the parent within forty-

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						five school working days after receipt of the parent's written consent to evaluate to the Department by July 15, 2005 .
SE 11 School district response to parental request for independent educational evaluation	Substantially Implemented	Student records Description of district practices for determining a student's eligibility for an Independent Education Evaluation at public expense	The district, if a parent disagrees with an initial evaluation or re-evaluation completed by the district and requests an Independent Educational Evaluation, implements all requirements.			
SE 15 Outreach by the School District (Child Find)	Substantially Implemented	Staff interviews District's screening process and test instrument Announcement sent to newspaper, local TV station, childcare	The district ensures annual or more frequent outreach and continuous liaison with those groups from which promotion or transfer of students in need of special			

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		facilities, and preschools Announcement at parent information night Meeting notice for pre-school screening Kindergarten/screening registration notices	education may be expected, or which would include students in need of special education.			
SE 18A IEP development and content	Substantially Implemented	Job description of district's Team Facilitator List of all persons in the district authorized to commit the resources of the school district during Team meetings Student records Staff interviews	The Team, upon determining that the student is eligible for special education, uses evaluation data to develop the IEP that contains all required elements. The district ensures that each IEP Team has at least one person with authority to commit the resources of the district.			
SE 18B Determination of	Not Substantially	Student records	The Team fully develops the IEP	Not Fully Implemented	The district does not consistently convene	The district will draft and distribute a memo to

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placement; immediate provision of IEP to parent	Implemented		and determines appropriate placement to deliver the services on the student's IEP.		a Team meeting, provide the parent with a proposed IEP and placement, or a written explanation of the finding of no eligibility within the mandated forty-five school working days from receiving written parental consent.	<p>special education staff, including Team Chairs, regarding timelines for provision of Team Meetings, IEPs to the parents, or a written explanation of the finding of no eligibility within forty-five school working days after receipt of the parent's written consent to evaluate. A copy of the memo will be provided to the Department by January 15, 2005.</p> <p>The district will randomly select five (5) IEPs and submit documentation that the IEPs were provided to the parent within forty-five school working days after receipt of the parent's written consent to evaluate to the Department by July 15, 2005.</p>

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SE 20 Least restrictive program selected	Substantially Implemented	Student records Description of district efforts to establish less restrictive special education programs and practices Staff interviews	The district ensures the program selected for a student is the least restrictive environment and, when removal from the general education classroom is needed, transition to a less restrictive program is promoted.			
SE 21 School day and school year requirements	Substantially Implemented	Student records Staff interviews	The district implements school day and school year requirements including providing extended day or year programs for special education students who demonstrate substantial regression or recoupment of mastered skills.			
SE 22 IEP implementation	Not Substantially Implemented	Student records; copy of letters mailed to parents regarding unanticipated	The district has an IEP in effect for eligible students at	Not Fully Implemented	The district, in its letter to parents informing them of a	The district, in the event of any delay in services on an accepted IEP, will

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and availability		vacancy of speech-language pathologist (11/2003) and occupational therapist (5/2004); staff interviews.	the beginning of each school year and provides as many of the services on the accepted IEP as possible and immediately informs parents in writing of any delayed services and the reason for delay.		delay in services and reason for the delay, does not identify the specific actions the district is taking to address the lack of personnel or offer alternative methods to meet the goals on the accepted IEP, and upon parental agreement, implements the alternative methods immediately until the delay in service is resolved.	immediately inform parents in writing describing: <ol style="list-style-type: none"> 1. Services affected 2. Reason(s) for the delay 3. Actions the district is taking to address the delay 4. Alternative methods that will be offered to meet the goals on the accepted IEP and, 5. Immediate implementation, upon agreement of the parents, of the alternative methods until the delay is resolved.
SE 24 Notice to parent regarding proposal or refusal to initiate or change the identification,	Not Substantially Implemented	Student records	The district provides required notice to parents regarding the district's proposal or refusal to initiate or change	Not Fully Implemented	The district does not consistently send the parent or parents the proposal to evaluate, i.e. consent, within 5 SWD of receiving the	The district must provide a copy of each parent request for the months of September, October, and November 2004, including the date the

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evaluation, or educational placement of the child or the provision of FAPE			a student's identification, evaluation, educational placement, or provision of free, appropriate public education (FAPE).		request to evaluate.	request was received and the date the consent form was mailed to the parent. All requirements due by January 15, 2005.
SE 25 Parental consent	Substantially Implemented	Student records Staff interviews	The district obtains informed parental consent as required by state and federal law.			
SE 26 Parent participation in meetings	Substantially Implemented	Student records District continuous improvement plan Staff interviews	The district ensures that one or both parents are members of the Team and, if neither parent can attend, uses other methods to ensure parent participation in the Team process.			
SE 27 Content of Team meeting notice to parents	Substantially Implemented	Student records	The district ensures that parent notices meet all state and federal law content requirements and Team meeting			

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			notices state the meeting's purpose, time, location, and attendees.			
SE 28 Parent provided the IEP or notice of no eligibility together with notification of procedural safeguards and parents' rights	Not Substantially Implemented	Student records	The district, at the Team meeting, fully develops the IEP and determines appropriate placement to deliver the services on the student's IEP.	Not Fully Implemented	The district does not consistently convene a Team meeting, provide the parent with a proposed IEP and placement, or a written explanation of the finding of no eligibility within the mandated forty-five school working days from receiving written parental consent.	The district will draft and distribute a memo to special education staff, including Team Chairs, regarding timelines for provision of Team Meetings, IEPs to the parents, or a written explanation of the finding of no eligibility within forty-five school working days after receipt of the parent's written consent to evaluate. A copy of the memo will be provided to the Department by January 15, 2005 . The district will randomly select five IEPs and submit documentation that the IEPs were provided to the parent within forty-five school working days

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						after receipt of the parent's written consent to evaluate to the Department by July 15, 2005.
SE 29 Communications are in English and primary language of home	Substantially Implemented	Student records Staff interviews	The district ensures that communications with parents are in simple and commonly understood words and are in both English and the primary language of the home if other than English.			
SE 30 Elements of notice of parents' rights	Substantially Implemented	Student records Copy of parent's rights brochure currently used by the district	The district ensures the notice of parental rights contains all required elements included in the most current version of the Massachusetts Parent's Rights Brochure.			
SE 32 Parent advisory	Substantially Implemented	List of PAC officers	The district has established a			

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council for special education		PAC by-laws and operating guidelines Calendar of events for 2002-2003 and 2003-2004 school years Copy of individual PAC meeting agendas Copy of PAC Welcome Packet PAC agendas of training sessions conducted by the PAC PAC parent interviews Staff interviews	district-wide parent advisory council (PAC) on special education that is offered to all parents of children with disabilities and other interested parties. The PAC has established by-laws and, upon reasonable notice and subject to the availability of staff and resources, receives assistance from the school committee without charge. The district annually conducts, in cooperation with the PAC, a workshop on the rights of students and their parents/guardians under state and federal special			

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SE 33 Involvement in the general curriculum	Not Substantially Implemented	Student records Staff interviews	education laws. The district has aligned its curriculum with the Massachusetts Curriculum Frameworks and at least one Team member is familiar with the general curriculum in order to discuss appropriate access for the student. Additionally, in the IEP, the district documents the student's participation in the general curriculum.	Not Fully Implemented	The district does not consistently have a least one member of its IEP Team Meetings that is familiar with the general curriculum and is able to discuss the student's access to the general curriculum. See SE 8.	The district must draft a memorandum, distribute it throughout the district, and provide a copy to the Department reminding all of its education personnel of the mandated requirements for Team composition for all Team Meetings. This requirement is due January 15, 2005 . The district must also provide the Department with twenty completed Team meeting attendance sheets due by July 15, 2005 .
SE 34 Continuum of alternative services and placements	Substantially Implemented	Student records District's range of special education program and related service options available to students	The district ensures, arranges, and provides for a continuum of services and alternative placements that are			

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		District's continuum of vocationally related programs and services	available to and meet the needs of students in special education.			
SE 36 IEP implementation, accountability and financial responsibility	Substantially Implemented	Student records Staff interviews Documentation	The district, for students placed out-of-district, oversees and ensures IEP's are implemented without delay upon parent consent and at no cost to the parent. The district may access the parent's private insurance to support the costs of IEP implementation only after obtaining parental consent and informing the parent that, if they refuse consent, the school district is still responsible for implementing the IEP.			
SE 37	Not	Listing of all public and	The district has	Not Fully	The district does not	The district will document

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Procedures for approved and unapproved out-of-district placements	Substantially Implemented	<p>private day and residential programs contracted by the district (approved and unapproved by the DOE)</p> <p>Copy of DOE letter authorizing use of unapproved private school</p> <p>Copy of DOE letter authorizing pricing for specialized placement</p> <p>Copy of contract and monitoring plan for out-of-district program</p>	<p>appropriate procedures for placing students in approved and unapproved out-of-district placements.</p>	Implemented	<p>document all actual monitoring activities in the files of every eligible student who has been placed out-of-district.</p>	<p>all actual monitoring activities in the files of each eligible student placed out-of-district. The district will randomly select five (5) records of students placed out-of-district and submit a copy of all actual monitoring activities for the 2004-2005 school year to the Department by July 15, 2005.</p>
SE 38 Educational services in institutional settings (<i>ESIS</i>)	Currently not applicable		This criterion only applies to students who are receiving special educational services in institutional settings.			
SE 39 Procedures used to provide services to eligible students enrolled in private schools at private		District's most recent child count of eligible students enrolled in private schools at private expense; student records; district's description and		Not Implemented	The district did not provide any documentation for this criterion; therefore the Department views	The district must draft and provide a copy to the Department outlining its policies and procedures used to provide services to eligible students enrolled

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expense		procedures for students enrolled in private schools at private expense; copies of letters sent to private schools informing the private school of the district's intent to supply special education services as consented to by the parent.			this lack of documentation to mean that the district does not have any policies and procedures enacted to provide services to eligible students enrolled in private schools at a private expense.	in private schools at a private expense. Also, the district must provide a copy of their most recent Child Count of eligible students enrolled in private schools at a private expense. All requirements are due at the Department by January 15, 2005 .
SE 43 Behavioral interventions	Substantially Implemented	Student records District's description of practices and staff guidance regarding the development of behavioral interventions and conducting functional behavioral assessments when required	The Team, for students whose behavior impedes their learning or the learning of others, considers the student's behavior including, but not limited to, the possible need for a functional behavioral assessment (FBA).			
SE 46 Procedures for suspension of students with	Not Substantially Implemented	Student records Documentation	The district has procedures for suspending eligible students with	Not Fully Implemented	The district did not submit a description of local practices regarding the	The district will submit a copy of its local practices regarding the implementation of

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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			disabilities.		implementation of manifestation determinations or a description of how the district ensures that all Interim Alternative Education Settings ensure access to all IEP services and to the general curriculum for students placed in these settings.	manifestation determinations, and submit a description of how the district ensures that all Interim Alternative Education Settings ensure access to all IEP services and to the general curriculum for students placed in these settings to the Department by January 15, 2005.
SE 47 Procedural requirements applied to students not yet determined to be eligible for special education	Not Substantially Implemented	Documentation	The district, for students who have been suspended but not yet determined to be eligible for special education, has a general procedure to make all protections available to them.	Not Fully Implemented	The district has not formalized in writing the procedures that provide procedural safeguards to students who have been suspended but not yet determined to be eligible for special education.	The district will develop written procedures that describe/detail how it provides procedural safeguards to students who have been suspended but not yet determined to be eligible for special education and submit a copy of these procedures to the Department by January 15, 2005.
SE 48 FAPE (Free, appropriate, public	Substantially Implemented	District's description of the continuum of vocational programs	The district offers a continuum of vocational programs			

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education): Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education		<p>available to all students (IOP, Career Tech, Vocational Collaborative, or Westfield Vocational School).</p> <p>Description of the types of counseling services that are used to satisfy such needs as determined by IEP Teams</p> <p>Student Records</p>	<p>that ensures 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, non-academic, and extracurricular programs of the school.</p>			
SE 49 Related services	Not Substantially Implemented	Student records List of related services currently provided or contracted by the district	The district arranges for the provision of related services that are required to assist eligible students to	Not Fully Implemented	Due to large caseloads, the district does not consistently provide related services that are	The district is to provide the Department with a random sample of 20 special education students' service delivery

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		Staff interviews	benefit from special education or to access the general education curriculum.		required to assist eligible students to benefit from special education or to access the general education curriculum.	grids that receive related services to access the general curriculum. Also, the district to provide the times and dates that these students received their related services for the months of September, October, and November 2004. All requirements are due at the Department by January 15, 2004.
SE 49A Special Transportation	Substantially Implemented	Student records Description of district practices for providing special transport to students with disabilities Number of district students who receive such service	The district ensures that eligible students receive transportation or specialized transportation arrangements in order to benefit from special education as provided by the student's IEP.			
SE 50 Responsibilities of the School Principal and Administrator of	Not Substantially Implemented	District organization chart Job descriptions of Principals and Director of Special Services	The district has a person to be its Administrator of Special Education. The Administrator	Not Fully Implemented	The district does have a written District Curriculum Accommodation Plan (DCAP), but it is not	The district will update the job description for the Principal at each school to include the following responsibilities:

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Special Education		<p>Copy of District Curriculum Accommodation Plan (DCAP)</p> <p>District policy for educational services in the home or hospital; description of services available to limited English proficient students.</p>	<p>supervises all special education for the school district and ensures compliance with all federal and state special education laws.</p>		<p>consistently being implemented and utilized to accommodate students within the general education classroom before referring them for special education and/or related services. The job description for the Principal at each of the district's schools did not include the following responsibilities: implements the DCAP; arranges for the provision of educational services in the home or hospital upon receipt of a physician's written order; ensures documentation on the use of instructional support services for a</p>	<ol style="list-style-type: none"> 1. Implements the DCAP 2. Arranges for the provision of educational services in the home or hospital upon receipt of a physician's written order 3. Ensures documentation on the use of instructional support services for a student referred for an evaluation is provided, as part of the evaluation information, to the Team when determining eligibility 4. Coordinates with the Administer of Special Education the delivery and

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					<p>student referred for an evaluation is provided, as part of the evaluation information, to the Team when determining eligibility; and coordinates with the Administer of Special Education the delivery and supervision of special education services within each school building.</p> <p>The district did not submit a list of special education services available to limited English proficient students (LEP).</p>	<p>supervision of special education services within each school building</p> <p>The district will submit copies of the job descriptions to the Department by January 15, 2005.</p> <p>The district will submit a list of special education services available to LEP students to the Department by January 15, 2005.</p>
SE 54 Professional development regarding special	Substantially Implemented	District professional development agendas Handouts	The district considers the needs of all staff in developing training			

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education		Attendance sheets Copy of annual district workshop for the PAC regarding student and parental rights	opportunities for professional and paraprofessional staff and annually provides a variety of offerings that includes all required topics.			
SE 56 Special education programs and services are evaluated	Not Substantially Implemented	Documentation	The district has recently developed a 3-year special education program evaluation schedule.	Not Fully Implemented	The district's 3-year special education program evaluation schedule does not include related services, or administrative areas. Nor does the evaluation schedule address the criteria or methods it will use to determine the effectiveness of the areas to be evaluated.	The district will update its 3-year special education program evaluation plan to include the areas of related services and administrative. In addition to measuring the effectiveness of special education programs, the data will assist in identifying programs, services, and administrative areas that need improvement and/or must be developed. Data for the evaluation should be derived from, but not limited to: analysis of IEP goals (<i>e.g.</i>

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						<p><i>percentage of goals each student met; of the goals not met, what is the percentage ranking of goal focus areas); dropout rates (e.g. rate of regular education drop-out versus special education drop-out; incidence of dropout by disability; etc.); graduation rates (e.g. rate of regular education graduation versus special education graduation; incidence of graduation by disability; etc.); and efficacy of administrative functions/processes.</i></p> <p>The district will submit a copy of the plan to the Department by July 15, 2005.</p>
Mid-Cycle Civil Rights Requirements						
MOA 5A Placement of homeless students	Not Substantially Implemented	Documentation	The district, according to the best interest of the homeless student,	Not Fully Implemented	The district did not submit district-wide written policies on the placement of	The district will submit its district-wide policies on placement, immediate enrollment, and

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			continues the student's current education for the remainder of the academic year or enrolls the student in an eligible public school where the student is actually living.		homeless students, the immediate enrollment of homeless students, and the transportation of homeless students to and from the school of origin.	transportation of homeless students. The district will copy and submit these policies/procedures to the Department by January 15, 2005 regarding: <ol style="list-style-type: none"> 1. Homeless students 2. Records of homeless students 3. Enrollment records 4. Written explanations to parents or guardians if any 5. Documentation apportioning responsibility and costs for transportation with another district or districts.
MOA 5B Immediate enrollment of	Not Substantially Implemented	Documentation	The district immediately enrolls a homeless student	Not Fully Implemented	Please see MOA 5A above.	Please see MOA 5A above.

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homeless students			even if the student is unable to produce records normally required for enrollment.			
MOA 5C Transportation of homeless students to and from the school of origin	Not Substantially Implemented	Documentation	The district provides transportation to homeless students to and from their school or origin.	Not Fully Implemented	Please see MOA 5A above.	Please see MOA 5A above.
MOA 17A Use of physical restraint on any student enrolled in a publicly-funded education program	Not Substantially Implemented	Documentation	The district has a comprehensive physical restraint program that addresses appropriate responses to student behavior that may require immediate intervention. The district conducts annual program training for staff on the use of restraint policy, training protocol, reporting procedures; use of restraint protocols,	Not Fully Implemented	The district did not submit its written procedures regarding restraints that includes: <ol style="list-style-type: none"> 1. Annual staff training on appropriate use of restraint consistent with regulatory requirements, 2. Reporting requirements and procedures 	The district will copy and submit its written procedures regarding restraints that includes: <ol style="list-style-type: none"> 1. Annual staff training on appropriate use of restraint consistent with regulatory requirements, 2. Reporting requirements and procedures for administrators, parents, and the Department consistent with

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			etc.		for administrators, parents, and the Department consistent with regulations, 3. Standard parent notice regarding the district's restraint policies and procedures, 4. Person(s) responsible for staff training 5. Applicable waiver procedures consistent with regulations.	regulations, 3. Standard parent notice regarding the district's restraint policies and procedures, 4. Person(s) responsible for staff training 5. Applicable waiver procedures consistent with regulations to the Department by January 15, 2005.
Other Requirements from Coordinated Program Review						
SE 4	Not	Student records	Assessment results	Not Fully	The district does not	The district must draft a

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Reports of assessment results	Substantially Implemented		summarize in writing the procedures, results, diagnostic impressions, and student's educational needs.	Implemented	consistently have assessments completed prior to discussion by the Team.	memorandum and provide a copy to the Department, reminding all of its education personnel of the mandated timeline of 30 SWD for completing assessments after receiving written parental consent. This requirement is due at the Department by January 15, 2005 .
SE 13 Progress Reports and content	Not Substantially Implemented	Student records Staff interviews	The district provides progress reports to parents as least as often as parents are informed of the progress of non-disabled students and are maintained in the student's record.	Not Fully Implemented	Progress reports do not consistently report information on the student's progress toward the annual goal <u>and</u> if the progress is sufficient for the student to achieve the goal by the end of the IEP period.	The district will draft a memo to all staff who complete special education progress reports reiterating the requirement that each progress report must contain information on the student's progress toward the annual goal <u>and</u> if the progress will be sufficient for the student to achieve the goal by the end of the IEP period. A copy of the memo will be submitted to the Department by January 15, 2005 .

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						The district will submit copies of progress reports for five (5) students to the Department by July 15, 2005 .
SE 53 Use of para-professionals	Substantially Implemented	Training agendas and other documentation related to special education related staff development activities for paraprofessional staff Description of implementation practices for the use of paraprofessional staff	The district appropriately trains paraprofessionals and assistants to provide special education or related services. Paraprofessionals and assistants do not design instruction but implement instruction under appropriate supervision.			
SE 55 Special education facilities and classrooms	Not Substantially Implemented	Observation Staff Interviews	The district does provide some facilities and classrooms for eligible students, which maximize their inclusion into the life of the	Not Fully Implemented	The space allotted for special education service providers within the district are still not equal in quality to the space allotted to regular education programs.	The district must submit an action plan to remedy the continued inconsistencies of the locations and size for special education programs as compared to the location and size of

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			school.		Specifically, physical therapy services are being provided in hallways and on stages in some schools in the district.	the average regular education spaces. This requirement is due at the Department by January 15, 2005 .