

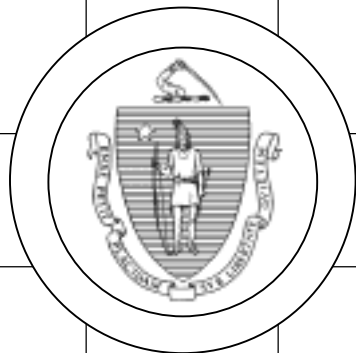


THE GIFFORD SCHOOL

**APPROVED PRIVATE SCHOOL
PROGRAM REVIEW
REPORT OF FINDINGS**

**Dates of Onsite Visit: May 14-17, 2001
Date of Draft Report: August 31, 2001
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**MASSACHUSETTS DEPARTMENT OF EDUCATION
APPROVED PRIVATE SCHOOL PROGRAM REVIEW**

THE GIFFORD SCHOOL

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MASSACHUSETTS DEPARTMENT OF EDUCATION

APPROVED PRIVATE SCHOOL PROGRAM REVIEW REPORT

THE GIFFORD SCHOOL

OVERVIEW OF REVIEW PROCEDURES

The Massachusetts Department of Education is required under Chapter 766 of the Acts of 1972, Chapter 15 S.1M to review special education programs in approved private special education schools which serve publicly funded students under the provisions of Board of Education Regulations 603 C.M.R. Section 18.00. As part of this review process, each Approved Private School develops an application for approval by the Department of Education and periodically updates information included in the application which describes how special education services are provided. Each year, the Department's Program Quality Assurance Services unit conducts onsite visits to selected Approved Private Schools to verify the implementation of their applications. The selected schools for 2000-2001 were notified in May 2000 of scheduled visits and were encouraged to implement self assessment activities prior to the arrival of the Department's visiting team.

Private School Program Review Elements

Team: Depending upon the size of a private school and the number of programs to be reviewed, a team of approximately 2-3 Department staff members conducts an Approved Private School Program Review over two to five days in the private school. In some instances, Massachusetts human service agency staff and a representative of the local school district may also participate on the visiting team.

Scope: Starting in FY 2000, all approved private schools in the Commonwealth will be monitored through the Department's Approved Private School Program Review system on a six-year cycle with an additional mid-cycle followup visit. This six-year monitoring and followup cycle is coordinated with the Department's Approved Private School Application Renewal procedures.

Content: The Program Review criteria encompass key elements drawn from the 603 C.M.R. Section 18.00 Regulations and the private school's Application for Approval under these regulations. The elements selected for the 2000-2001 reviews also contain 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 issued during the 1997-99 school years. 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 which are intended to promote high standards and achievement for all students.

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

- Interviews of administrative, clinical, instructional and support staff across all grade levels;
- Parent Group representatives, and other interviews as requested by persons from state and

local agencies and the general public;

- Student record reviews: A sample of student records is selected for detailed review by the Department of Education. Student records are examined first by the school's staff and then verified by the Onsite Team using standard Department student record review procedures in order to make determinations regarding the implementation of procedural and programmatic requirements. Parents of students who are selected for the record review are provided an opportunity to be interviewed by telephone.
- Classroom and Facilities Observation: A sample of instructional classrooms and school facilities used in the delivery of programs and services are visited to determine general levels of compliance with program requirements.

Response: A detailed report of findings describes determinations about the implementation status of each requirement (Criterion) reviewed. Included with the findings are commendations for those criteria which have been implemented in an exceptional manner. For those criteria not found to be fully implemented, the Private School must propose corrective actions to bring those areas into compliance with respective statutes or regulations. Private Schools are encouraged to incorporate the corrective action activities into their program improvement planning activities, as well as the school's professional and paraprofessional staff development plans.

The Department of Education believes that the Private School Program Review process is a positive experience and that the Final Report should be seen by the school and general public as a helpful planning document for continuing development of programs and services in the Private School.

REPORT INTRODUCTION

A two-member Massachusetts Department of Education team visited Gifford School during the week of May 14, 2001 to evaluate the implementation of selected compliance criteria under the Massachusetts Board of Education Regulations for the Approval of Private Special Education Schools to Serve Publicly Funded Students [603 C.M.R. Section 18.00], M.G.L. Ch.71B (Chapter 766 of the Acts of 1972) and federal special education requirements under the Individuals with Disabilities Education Act as amended in 1997 (IDEA-97). The team appreciated the opportunity to interview staff and parents, to observe classroom facilities, and to review the program efforts underway in the school. The review team would like to commend the following program areas that were brought to the attention of the Department and that the team believes have a significant and positive impact on the delivery of educational services for students enrolled in Gifford School. These areas are as follows:

- *The structure of teams within the school fosters effective communication among the educational, clinical and behavioral components of the program.*
- *Professional development offerings are responsive to the needs of staff. Examples include courses offered in teacher certification test preparation, computer training, systematic instruction and writing across the curriculum.*
- *Weekly communication with parents, in addition to activities offered through the parent advisory committee, enables parents to feel supported and informed about all aspects of their child's program.*
- *Gifford School functions as a resource to surrounding communities by sponsoring the Brainstormers Group, which is a collaboration between public and private special educators, by hosting a yearly fall conference on special education issues, and by other activities. Gifford participates in community activities outside of the school such as the Private School Clinical Director's Forum, the Multicultural Alliance and the Community Based Justice Program.*
- *Gifford School is able to foster a sense of community among its staff and students through holding activities such as the Halloween Carnival, Thanksgiving Festival, Holiday Follies, World of Difference Week (which is planned by a cross-school committee of students and staff), and Spring Dance.*
- *A weekly schedule which includes defined times for training and supervision as well as for when administrators will be accessible fosters an atmosphere in which staff members feel supported.*
- *Gifford is responsive to the needs of its students and staff, as demonstrated by the development of the Women's Issues Group, the Diversity Group, and other special interest campus clubs requested by students.*

Some of the areas of commendation noted above are additionally stated within the body of the Department's report under the respective compliance criteria.

The Department is submitting the following Private School Program Review Report containing findings pursuant to this onsite visit. This report was prepared as a result of the review of extensive written documentation and data regarding the operation of the school's programs, together with information gathered from the following Department program review methods:

- Interviews of five (5) administrative staff;
- Interviews of four (4) clinical staff;
- Interviews of seven (7) teaching and educational support services staff;
- Interviews of two (2) Parent Group representatives and other parents of Massachusetts students enrolled in the school;

- Student Record Reviews: A sample of fifteen (15) Massachusetts student records was selected by the Department. Student records were examined first by the school's staff and then verified by the onsite team using standard Department of Education student record review procedures in order to make determinations regarding the implementation of procedural and programmatic requirements; and
- Classroom and Facilities Observation: A sample of four (4) instructional classrooms and school facilities used in the delivery of programs and services was visited to determine general levels of compliance with program requirements.

The report addresses findings for the program components listed in the Table of Contents and that are most directly related to the teaching and learning of students. The findings for each program area describe determinations by the Team about the implementation status or "Rating" for each criterion reviewed. The findings note those criteria which were found by the Team to be substantially "Implemented" or implemented in a "Commendable" manner. (Refer to the "Definition of Terms For Ratings" section of the report.) For those criteria found to be either "Partially Implemented" or "Not Implemented," the Private School must propose to the Department corrective actions to bring those areas into compliance with the related statute or regulation. In some instances the Team may have found certain requirements to be fully "Implemented" and has made specific "Comment" on the school's implementation methods which also may require response from the Private School.

The Private School is expected to incorporate the corrective action activities into any program improvement plans, including the school's professional and paraprofessional staff development plan.

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.
Implemented	The requirement or criterion 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 private school.

COMPONENT I: PERSONNEL QUALIFICATIONS AND CERTIFICATION

CRITERION NUMBER	
	Legal Standard
1.1	The private school designates an educational administrator to supervise the educational program. The administrator has either certification as a special education administrator or all of the following: <ul style="list-style-type: none"> a. certification as a special education teacher in the area of the students' special education needs; b. a minimum of a master's degree in special education or a related field; and c. a minimum of one year of administrative experience in education or related human service field. 18.05 (1)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
1.2	The private school submits written evidence that all teachers are certified or hold current waivers. 18.05(7)(a)(1)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

A Department of Education teacher certification check indicated that teacher certification for two regular education teachers has expired. Gifford School submitted applications for waivers for all teachers when necessary; however, four teachers did not submit their application for Massachusetts teacher certification, and therefore these waivers were not granted. These teachers do not have teacher certification or waivers.

CRITERION NUMBER	
	Legal Standard
1.3	The private school submits written evidence that all personnel who provide related services under paragraph 503 of the Chapter 766 Regulations are currently licensed, certified and/or registered by their respective Boards. 18.05(7)(a)(2)

CRITERION NUMBER	
	Legal Standard
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT II: INFORMATION, NOTIFICATIONS AND POSTINGS REQUIRED BY THE DEPARTMENT OF EDUCATION

CRITERION NUMBER	
	Legal Standard
2.1	The private school implements the following aspects of its programs and services as described in its program application which has been approved by the Department of Education: a. Operational capacity; b. Ages of students; c. The educational and behavioral characteristics of students; d. Admissions criteria and admissions procedures including the interview of prospective students.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
2.2	The private school provides written notification to the Department to obtain approval before the following changes are made: a. any reduction of services or reduction of staff that results in a change from the previously approved student/teacher ratio; b. building changes that affect the care of the students; c. major changes in the population to be served; and d. significant changes in policy or procedures. 18.04(5)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
2.3	<p>Immediate notification to the Department is made for the following:</p> <ul style="list-style-type: none"> a. whenever any student runs away b. whenever a student is administered medication in an emergency situation c. in case of emergency termination, such as circumstances in which the student presents a clear and present threat to the health and safety of him/herself or others d. a written termination summary explaining the reasons for the emergency termination is sent to the parents, the student (if over 14 years of age), local administrator of special education, officials of the appropriate human service agency and the Department e. the death or hospitalization of a student due to injury at school or previously unidentified illness or disorder which occurs while the student is in the program f. the filing of a 51-A report with DSS against a school staff member for abuse or neglect of a student g. any action taken by a federal, state or local agency that might jeopardize the school's approval with DOE h. any legal proceeding brought against the school or employee arising out of circumstances related to the care or education of students in the school.
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Staff interviews indicated that Gifford School has not reported all serious incidents to the Department of Education using Form 2, as required.

CRITERION NUMBER	
	Legal Standard
2.4	<p>The private school posts in an area of the administration building accessible to visitors and employees the following items:</p> <ul style="list-style-type: none"> a. notification of current approval or intake status issued by the Department 18.04(6)(a); b. current tuition rate for students 18.04(6)(b); c. an organizational chart showing the current administrative structure of the private school, including the lines of authority and staff assignments 18.04(6)(c); d. first aid, emergency medical procedures and emergency telephone numbers 18.04(6)(d); and e. evidence of authority to operate the private school and related documents, such as ownership, partnership agreement,

CRITERION NUMBER	
	Legal Standard
	corporations, articles, charters, constitutions, by-laws. 18.04(6)(e).
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT III: EDUCATION PROGRAM REQUIREMENTS FOR DAY AND RESIDENTIAL SCHOOLS

CRITERION NUMBER	
	Legal Standard
3.1	The private school provides an average annual minimum of five hours of instruction daily for elementary level programs and five and one half hours of instruction daily for secondary level programs. 18.05(2)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
3.2	The program is conducted for at least 180 days for a 10 month program (198 for 11 month and 216 for 12 month), exclusive of weekends, holidays and vacations. 18.05(2)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
3.3	The private school provides the educational and the related services as required by the student's IEP including: <ul style="list-style-type: none"> a. self-help skills, activities of daily living; b. motor activities, physical education; c. English, reading, writing, language communication skills; d. math, quantitative skills and concepts;

CRITERION NUMBER	
	Legal Standard
e. f. g. h.	vocational education programs; other curriculum areas required by local public school committees for graduation; related services required to achieve the long term goals and objectives in the student's IEP; any service, in addition to those referred to above, materials or specialized equipment beyond that prescribed in accordance with paragraph 507 of the Ch. 766 Regulations necessary to implement the student's IEP shall be referred by the public school where the student resides to the appropriate TEAM in accordance with M.G.L. C28A, s.6(a). 18.05(3)(c)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT IV: DISCIPLINE, GUIDANCE AND BEHAVIOR MANAGEMENT

CRITERION NUMBER	
	Legal Standard
4.1	The private school develops a school policy dealing with discipline, guidance and behavior management. The policy or procedures are clear, fair, consistent and appropriate for the student population and protect the students' rights. Such written policies for discipline, guidance, behavior management procedures are provided in accordance with regulations. 18.08(5)a-o
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:
Staff interviews indicated that staff and students understand the level/point behavioral management system. The school's written behavior management policy, however, does not describe the level/point system and how it is implemented. Also, the policy details at-home suspensions but does not make reference to in-school suspensions.

CRITERION NUMBER	
	Legal Standard
4.2	Discipline, guidance and behavior management procedures are consistently implemented in accordance with the school's policies. 18.05(4)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
4.3	Restraint procedures with related staff training are implemented in accordance with regulations and related incident reports are filed. 18.08(5)h
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that internal reports on restraints are currently being filed. How incident reports are written and reviewed, however is inconsistent. Some reports detail student behavior and staff reactions leading up to the restraint, but end with the student being put into a restraint. Other reports detail the duration and type of restraint used but do not describe events before the student was restrained. Restraint reports do not always include required signatures.

CRITERION NUMBER	
	Legal Standard
4.4	Procedures for dealing with runaways are implemented in accordance with regulations and related incident reports are filed with school districts, Department of Education and other appropriate human service agencies. 18.06(10).
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

The private school's written policy does not indicate who is responsible for calling police and parents and informing the Department of Education when a student leaves campus. Staff interviews and documentation review indicated that the Department of Education has not been notified when students run away.

CRITERION NUMBER	
	Legal Standard
4.5	The private school participates with the responsible school district in the development of a student's IEP which indicates if the student is or is not expected to meet the program's regular discipline code and, if not, what modifications are required. Ch. 766 Regulation 322.11 and IDEA-97
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
4.6	The private school 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). IDEA-97
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Staff interviews indicated that school coordinators and case monitors track the number of suspensions.

CRITERION NUMBER	
	Legal Standard
4.7	<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; joint responsibilities of the private school and the responsible school district:</p> <p>a. 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.</p> <p>b. Prior to a suspension that constitutes a change in placement of a student with disabilities, the private school requests the student's responsible school district to convene a TEAM meeting which includes representation from the private school:</p> <ol style="list-style-type: none"> 1. to develop or review a functional behavioral assessment of the student's behavior and to develop or modify a behavior intervention plan; 2. to identify appropriate alternative educational setting(s); and 3. 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

CRITERION NUMBER	
	<p style="text-align: center;">Legal Standard</p> <p>implemented? Does student understand impact and consequences of his/her behavior? Can student control behavior?).</p> <p>c. If the TEAM determines that the behavior is <u>NOT</u> a manifestation of the disability, then the private school may suspend or terminate the student consistent with policies applied to any other student in the program, except that the responsible school district must still offer an appropriate education program to the student with disabilities which may be in some other setting.</p> <p>d. 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</p> <ol style="list-style-type: none"> 1. if the behavior involves weapons or illegal drugs or another controlled substance while at school or a school function; or 2. 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 3. 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. <p>e. If the TEAM determines that the behavior <u>IS</u> a manifestation of the disability, then the district in coordination with the private school takes steps (with the consent of the parent) to modify the IEP, the placement, or the behavior intervention plan and does not suspend the student again during the school year.</p> <p>f. The school district provides written notice to the parent and the private school of all rights to parental appeal and to an expedited hearing. If the parent chooses to appeal, during the appeal the student stays put in the placement as described on the last accepted IEP or the interim alternative placement, unless the parent and the school district agree otherwise.</p> <p style="text-align: center;">Federal Requirements: 20 U.S.C. Chapter 33, Section 1415(k)</p>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Staff interviews indicated that the school does not have a formal system whereby the educational administrator of the private school or the sending public school district is notified that the number or pattern of a student’s suspensions requires the convention of a Team meeting to make a manifestation determination, develop or review a functional behavioral assessment, modify the student’s program or review the appropriateness of the placement.

COMPONENT V: CLASSROOM INSTRUCTIONAL MATERIALS

CRITERION NUMBER	
	Legal Standard
5.1	The private school provides adequate and current textbooks or individual materials during an instructional period for each student in accordance with IEPs. Each classroom has the following where appropriate: a. bulletin boards, chalk boards, display areas; b. individual desks, chairs and tables so that each student has an individual work space; and c. space for each student to store school supplies, books, papers and work. 18.05(5)(a), 1.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
5.2	The private school provides library or resource space with appropriate materials in addition to regular instruction areas. 18.07(6)(b)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT VI: STUDENT/TEACHER RATIO

CRITERION NUMBER	
	Legal Standard
6.1	Student/teacher ratios are maintained at 4-8 students to one teacher without an aide or 4-10 students to one teacher with an aide. 18.05(6)(a)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
6.2	Student/teacher ratios below 4:1 and above 10:1 are approved by the Department prior to being implemented. 18.05(6)(a)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT VII: PERSONNEL TRAINING, SUPERVISION AND EVALUATION

CRITERION NUMBER	
	Legal Standard
7.1	The private school develops a policy for personnel training, supervision and evaluation. 18.08(11)(h)
	Rating: Implemented RESPONSE REQUIRED: O No

CRITERION NUMBER	
	Legal Standard
7.2	<p>The private school provides a minimum of two hours a month of inservice training for all personnel on all shifts who provide educational or residential services to students. The inservice training is appropriate for the student population being served. Staff have input on training needs. Newly hired staff are provided training at the time of hire that is essential to their role and includes all mandated training such as restraint training, medication training, 51A reporting, etc. In addition, training on the following topics is provided to all staff providing educational or related services to students:</p> <ul style="list-style-type: none"> • Massachusetts Department of Education Curriculum Frameworks • The Massachusetts Comprehensive Assessment System (MCAS) <p>18.05(8)(a), the Education Reform Act of 1993</p>
	Rating: Commendable RESPONSE REQUIRED: No

Department of Education Findings:

Staff interviews indicated that the school provides a broad array of training opportunities, both mandatory and optional. Gifford School offers monthly half-day trainings in addition to conducting daily one-hour meetings. Clinical, educational and behavioral trainings led by administrative staff are conducted each week. In response to staff needs, the school has offered two six-week courses in writing across the curriculum and systematic phonetic instruction. The school also offers staff computer training and teacher certification test preparation courses.

CRITERION NUMBER	
	Legal Standard
7.3	Performance evaluations are maintained on all staff. Personnel are evaluated annually. 18.05(8)(b), 18.08(11)(c)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
7.4	The school has written procedures and staff training for the reporting of suspected child abuse or neglect to the Departments of Education and Social Services as required by M.G.L.c.119,§51A. 18.08(9)(j)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
7.5	The school has written documentation that required emergency first aid training has taken place and is renewed annually for all direct care personnel. 18.08(9)(e)1
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Staff interviews and documentation review indicated that CPR training was not offered to staff during the 2000-2001 academic year. Please note that although CPR training is not addressed in this criterion, new Department of Education regulation 603 CMR 18.05(9)(e) requires the school to provide annual CPR training and refresher courses.

CRITERION NUMBER	
	Legal Standard
7.6	The private school provides training to staff who are providing care and instruction to a student receiving medication. Such training is given by a physician or registered nurse. The training includes: nature of medication; potential side effects; and any special precautions or requirements. 18.08(9)(f)3.c
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews and documentation review indicated that staff receive informal instruction on medication administration and side effects. The school nurse has daily responsibility for all aspects of dispensing, monitoring and recording the handling of medication. However, staff who occasionally are required to dispense medications on field trips have not received formal detailed training on medication administration, and such training is not detailed in formal written policies and procedures.

COMPONENT VIII: EDUCATIONAL PLANS AND REVIEWS

CRITERION NUMBER	
	Legal Standard
8.1	The private school has on file a current, signed IEP for each enrolled Massachusetts student which has been issued by the responsible school district. The IEP contains the required Department of Education Addendum containing curriculum access information and necessary testing accommodations or alternate assessment information. 18.05(9)(a)
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Student record review revealed a written record of the school’s attempts to obtain signed IEPs from public school districts. In cases where unsigned IEPs were found in a student file, a letter from the private school to the district requesting a signed IEP was also included in the file. The private school has had a practice of including its own name and address at the top of the IEP form, but has discontinued this practice following recent guidance from the Department of Education.

CRITERION NUMBER	
	Legal Standard
8.2	The private school assigns an educational case manager to each student. 18.05(9)(b)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Student record and documentation review indicated that Gifford School assigns a case manager to each student. This information, however, is not maintained in the student record.

CRITERION NUMBER	
	Legal Standard
8.3	The private school carries out all aspects of students' IEPs. 18.05(9)(c)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.4	The private school does not make modifications in a student's IEP without prior approval from the public school and parents. 18.05(9)(d)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.5	The private school maintains copies of IEP progress reports in each student's file. a. Parents and the responsible school district receive narrative progress reports at least quarterly on the student's progress toward reaching the annual goals set in the IEP. b. Progress report information sent to parents includes information on the extent to which such progress is sufficient to enable the child to achieve the goals by the end of IEP period. 18.05(9)(e), IDEA-97
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

CRITERION NUMBER	
	Legal Standard
	<p style="text-align: center;">discharged. 18.05(11)(b)1-9</p> <p>c. copy of IEP, case manager and the plan for carrying out of the IEP; 18.05(11)(d)</p> <p>d. copies of quarterly progress reports and any modification of the IEP; 18.05(11)(d)</p> <p>e. copy of the student's termination or discharge plan; 18.05(11)(e)</p> <p>f. health records, including reports, documentation of physical examinations, allergies, screening tests, results of medical care; 18.05(11)(f)</p> <p>g. all evaluations or assessments conducted of the student; 18.05(11)(g)</p> <p>h. pertinent correspondence concerning the student; 18.05(11)(h)</p> <p>i. information regarding the use of restraint (chemical, mechanical, physical) and time-out procedures; 18.05(11)(i)</p> <p>j. recent picture; 18.05(11)(k)</p> <p>k. copies of all incident reports. 18.05(11)(k)</p>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

During student record review, a log of access was not found in any student record. A recent picture was missing from some student records. The student face sheet did not include emergency contact information or information on the source of the student's tuition.

COMPONENT X: PROVISIONS FOR THE TRANSITION OF STUDENTS FROM PRIVATE SCHOOL INTO PUBLIC SCHOOL

CRITERION NUMBER	
	Legal Standard
10.1	The private school, public school and parents determine during the annual or quarterly review of the student's program if the student should return to the public school or needs a transitional program. 18.05(10)(b)
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
10.2	The transition program is conducted for a period of time deemed necessary and appropriate by the Evaluation Team. 18.05(10)(b)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
10.3	The private school notifies the public school and parents in writing when a student is ready for a less restrictive program. 18.05(9)(f)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT XI: TRANSPORTATION SAFETY

CRITERION NUMBER	
	Legal Standard
11.1	The private school ensures that any vehicle used for transportation, and the drivers thereof, conform to the appropriate state and federal requirements pertaining to equipment and licensing and to Chapter 8 of the Chapter 766 Regulations. 18.05(12)(a)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.2	The private school ensures that any vehicles transporting students conform to all applicable state school transportation laws, M.G.L. Chapter 90 sections 7B-7D. 18.05(12)(b)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.3	The private school ensures that the number of students in any vehicle used by the school to transport students does not exceed the number of seats in the vehicle. All students are seated. 18.05(13)(a)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.4	Seat belts, restraints or suitable carriers are used by each student and driver and all car restraints meet federal and state safety standards. 18.05(13)(b)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.5	When more than nine students are being transported in a vehicle, an attendant other than the driver is present. 18.05(13)(c)
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Documentation review indicated that only eight students at a time are allowed in a vehicle.

CRITERION NUMBER	
	Legal Standard
11.6	Vehicles are free from all sharp, heavy or dangerous objects when transporting students. 18.05(13)(d)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Observation indicated that “chock-blocks” tied together with a rope are kept loose in the back of each van, posing a health and safety risk to staff and students.

CRITERION NUMBER	
	Legal Standard
11.7	Drivers and attendants are trained to deal with the students' problems such as seizures, motion sickness or disabilities. 18.05(13)(e)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.8	Students are released by the driver only to authorized persons. 18.05(13)(f)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that this requirement is not addressed in the private school's transportation policy.

CRITERION NUMBER	
	Legal Standard
11.9	The Department, parents, public school and human services agency are notified immediately in the event of an accident. In addition, written notification shall be sent to each of the above within 48 hours. 18.05(13)(h)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that this requirement is not addressed in the private school's transportation policy.

COMPONENT XII: REQUIREMENTS FOR DAILY CARE OF STUDENTS IN DAY AND RESIDENTIAL SCHOOLS

CRITERION NUMBER	
	Legal Standard
12.1	A description is available of how the private school will provide child care services if the absence of workers should develop. 18.06(1)(b)4
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Staff interviews and documentation review indicated that school teams meet each morning and arrange for any necessary coverage by reassigning available staff.

CRITERION NUMBER	
	Legal Standard
12.2	The private school provides full-time appropriate supervision of students while they are engaged in a school-related activity on or off school grounds, as reflected in a detailed plan. 18.06(1)(a-b)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT XIII: STUDENT TO CHILD CARE WORKER RATIO

CRITERION NUMBER	
	Legal Standard
13.1	The Department has approved a child care worker ratio of not lower than 4:1 nor greater than 6:1 during waking hours (except during the education component) and not lower than 6:1 nor greater than 8:1 during sleeping hours. 18.06(2)
	Rating: Not Applicable RESPONSE REQUIRED: No

Department of Education Findings:

Gifford School is a day school. This criterion refers to child care worker to student ratios during after school hours in a residential program..

CRITERION NUMBER	
	Legal Standard
13.2	Student to child care worker ratios above or below these levels are approved by the Department prior to implementation. 18.06(2)
	Rating: Not Applicable RESPONSE REQUIRED: No

Department of Education Findings:

Gifford School is a day school. This criterion refers to child care worker to student ratios during after school hours in a residential program..

COMPONENT XIV: SUPERVISION OF CHILD CARE WORKERS

CRITERION NUMBER	
	Legal Standard
14.1	A staff person with supervisory responsibility within the private school and previous appropriate experience supervises the child care workers. 18.06(4)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT XV: RECREATIONAL SERVICES
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CRITERION NUMBER	
	Legal Standard
15.1	Students have the opportunity to participate in daily recreational and leisure activities including the use of community recreational resources where appropriate. This is described in a written plan by the private school. 18.02(2)(u)

CRITERION NUMBER	
	Legal Standard
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews and observations indicated that the private school provides a wide array of daily recreational and leisure activities, both on campus and in the community. The provision of these activities is not, however, reflected in a written plan.

CRITERION NUMBER	
	Legal Standard
15.2	The private school arranges for individual and group recreational programs appropriate to the age, interests and needs of each student with assigned staff as appropriate. 18.02(2)(u)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT XVI: TOILETING PROCEDURES FOR DAY AND RESIDENTIAL PRIVATE SCHOOLS

CRITERION NUMBER	
	Legal Standard
16.1	Private schools that enroll students who are incontinent have a written plan describing required procedures for regular toileting and diapering, including the disposal and cleaning of soiled clothing and diapers. 18.06(8)(a)
	Rating: Not Applicable RESPONSE REQUIRED: No

Department of Education Findings:

Gifford School does not enroll students who are incontinent.

CRITERION NUMBER	
	Legal Standard
16.2	Toilet training plans are developed in accordance with the student's IEP, student needs and parent/guardian requests. 18.06(8)(b)
	Rating: Not Applicable RESPONSE REQUIRED: No

Department of Education Findings:

Gifford School does not enroll students who require toilet training plans.

COMPONENT XVII: RUNAWAYS

CRITERION NUMBER	
	Legal Standard
17.1	The private school has a policy for runaways that includes definition, timelines, staff, agency and parent notification procedures. 18.06(10)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

See finding under Criterion 4.4.

The private school's written policy for runaways states that local police are called after the student has been missing for thirty minutes; however, the written policy does not detail procedures to be followed and specific staff duties to be performed in the intervening thirty minutes. The written policy does not describe timelines for notifying parents, state police, the school district, and the Department of Education.

CRITERION NUMBER	
	Legal Standard
17.2	All private school personnel are trained in the policy and procedures for students who run away. 18.06(10)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

CRITERION NUMBER	
	Legal Standard
18.4	The private school conducts two evacuation drills per shift annually to insure that all students are able to leave the building safely. Students are informed about the nature of the drills, and special provisions are made for mobility impaired students. A written log of each evacuation drill is maintained. 18.08(10)(f)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
18.5	All staff are trained in the use of the alarm system and fire fighting equipment. 18.08(10)(b), 18.08(10)(e)2.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
18.6	The private school has had an asbestos inspection. 18.02(2)(b)8
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
18.7	The private school has had a PCB inspection. 18.02(2)(b)8
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

The documentation on PCB inspection provided to the Department of Education is a record of a conversation that the facilities manager had with the health agent for the town of Weston in 1999. The private school did not provide official documentation of a PCB inspection.

COMPONENT XIX: PHYSICAL FACILITY/KITCHEN AREA

CRITERION NUMBER	
	Legal Standard
19.1	The private school ensures the safe and secure storage of kitchen equipment, including major appliances. 18.07(2)(a)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
19.2	The kitchen is maintained in a sanitary condition and garbage receptacles are emptied and cleaned daily. 18.07(2)(b)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT XX: PHYSICAL FACILITY/CLASSROOM SPACE

CRITERION NUMBER	
	Legal Standard
20.1	The private school ensures that its programs are accessible and that the size of its classrooms are adequate with respect to: a. the number of students; b. student size; c. student age; d. student educational needs; e. physical capabilities of students; and f. educational/vocational activity. 18.07(6)(a), 1807(8)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Observation indicated that the drama, computer and woodshop programs are not provided in accessible spaces. The private school did not provide a written plan to make these programs accessible should a student with limited mobility require access to these programs.

COMPONENT XXI: PHYSICAL FACILITY/GENERAL SPACE REQUIREMENTS

CRITERION NUMBER	
	Legal Standard
21.1	Floors, ceiling and walls are in good repair and are clean and free from sharp or protruding objects. 18.07(7)(a)1-2
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
21.2	All hot water pipes and radiators are protected by covers. 18.07(7)(a)3
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
21.3	Room temperatures are maintained at not less than 68 , when 0 outside, and at not more than the outside temperature when the outside temperature is above 80 degrees. 18.07(7)(a)4
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
21.4	Administrative space is separate from classroom, staff, or parent conference areas. 18.07(7)(a)5
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
21.5	Outdoor spaces are free from hazards and are accessible to direct sunlight. 18.07(7)(b)1,2
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
21.6	Outdoor space areas have a barrier erected at least five feet tall if adjacent to dangerous areas. 18.07(7)(b)3
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
21.7	Outdoor areas are not covered by dangerously harsh or abrasive materials. 18.07(7)(b)4
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT XXII: HEALTH CARE POLICIES AND PROCEDURES
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CRITERION NUMBER	
	Legal Standard
22.1	The school has a licensed physician available for consultation. 18.08(9)(a)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
22.2	The school has an R.N. or L.P.N., as deemed necessary by the Department, depending on the health care needs of the school population. 18.08(9)(b)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
22.3	The school has a written health care policies and procedures manual made available to staff, approved by the health care consultant, that addresses: <ul style="list-style-type: none"> a. training of all direct service staff by a certified instructor in emergency first aid; b. secure storage of adequate first aid supplies, including but not limited to bandages, gauze, adhesive tape, hydrogen peroxide or other cleaning solutions, and ipecac. First aid supplies are easily accessible in each major activities area; c. written procedures for providing first aid are kept with the first aid supplies; d. the posting of telephone numbers for the fire department, police station, poison prevention center, hospital emergency room and ambulance service serving the school in both living quarters and educational facilities; e. the procedures to be followed in the case of illness or emergency, including the transportation methods and notification of parents; f. the procedures to be followed in the case of fire or other emergency; g. a procedure for informing parents of any first aid administered to their child or of any injury or illness that required care other than first aid; and h. the procedures to be followed in the case of illness or emergency if the parents cannot be reached. 18.08(9)(e)1-8
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
22.4	The school has written procedures and policies regarding administration of medication that include the following: <ul style="list-style-type: none"> a. no medication is administered to a student without written authorization from parent. Such authorization is renewed

CRITERION NUMBER				
Legal Standard				
	b. c. d. e. f. g. h. i. j.	annually; no prescription medication is administered to a student without the written order of the physician prescribing the medication to that student; the school identifies in writing all persons authorized by the school to administer medication to the student; all staff are provided with copies of the school's policies and procedures regarding administration of medication. Staff providing care and instruction to a student receiving medication are given instruction by a physician or registered nurse regarding the nature of the medication, potential side effects, and any special precautions or requirements that may need to be observed. Only trained staff administer medication. Where the school nurse delegates responsibility for administration of prescription medications to trained nursing-supervised school personnel, the school registers such unlicensed school personnel with the Department of Public Health pursuant to 105 CMR 210.004; any change of medication or dosage is authorized by a new order from a physician; a written record of the administration of prescribed medication to students is maintained. Such a record documents the side effects of medication and includes notification to attending physicians of changes in the student's behavior or health that may result from medication; all medication is kept in a locked, secure cabinet and labeled with the student's name, name of the drug and the directions for its administration. The school disposes of or returns to the parents any unused medication; medications are delivered to the school in containers labeled by the physician or pharmacist. Doses may be prepackaged. Provision is made for refrigerating those medications that require it; the school has a written policy regarding the amount of medication to be kept at any one time for each student receiving medication; a review of medications administered to a student is incorporated into the student's progress report. 18.08(9)(f)1-8	Rating: Implemented	RESPONSE REQUIRED: No

CRITERION NUMBER			
Legal Standard			
22.5	The school does not administer or arrange for the administration of antipsychotic		

CRITERION NUMBER	
	Legal Standard
	<p>medication except under the following circumstances:</p> <ul style="list-style-type: none"> a. any antipsychotic medication is prescribed by a licensed physician for the diagnosis, treatment and care of a student and only after review of the student's medication record and actual observation of the student; b. if antipsychotic medication is prescribed, the prescribing physician submits a written report to the school detailing information cited in the regulations; c. no antipsychotic prescription is administered for a period longer than is medically necessary as determined by the prescribing physician; d. staff providing care to a student receiving antipsychotic medication are instructed regarding the nature of the medication; e. except in an emergency, the school neither administers nor arranges for the prescription and administration of antipsychotic medication unless informed written consent is obtained; f. the school informs a student of 12 years of age and older, consistent with the student's capacity to understand, about the treatment risks and potential side effects of such medication. The school has procedures to follow if the student refuses medication; g. in an emergency situation, antipsychotic medication may be administered for treatment purposes without parental consent or prior judicial approval if an unforeseen combination of circumstances or the resulting state calls for immediate action and there is no less intrusive alternative to the medication. <p>18.08(9)(f)9(a-g)</p>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

The school's Health Care Manual does not include the school's policies and procedures for administration of antipsychotic medication.

CRITERION NUMBER	
	Legal Standard
22.6	<p>The school has a written plan for the preventive health care of the students that includes:</p> <ul style="list-style-type: none"> a. a plan to ensure that vision, hearing, postural and other required screening are conducted in accordance with the Chapter 766 Regulations and M.G.L. c.71 §57; b. the school provides a locked, secure cabinet to keep all toxic substances, medications, sharp objects and matches out of the

CRITERION NUMBER	
	Legal Standard
	reach of students. Medications and medical supplies are not locked in the same cabinet as other toxic substances. Toxic substances are labeled with contents and antidote. The phone number for the nearest poison center is posted clearly. 18.08(9)(h)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
22.7	The school has a written policy for protecting students from exposure to foods, chemicals and other material to which they may be allergic. 18.08(9)(f)i
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
22.8	In the absence of an emergency or epidemic of disease declared by the Department of Public Health, the school does not require day students to receive medical treatment when the parents object on the grounds that such treatment conflicts with a religious belief. 18.08(9)
	Rating: Implemented RESPONSE REQUIRED: No

COMPONENT XXIII: SCHOOL-TO-WORK COMPONENTS

CRITERION NUMBER	
	Legal Standard
23.1	Private schools may provide programs consisting of any or all of the following: a. vocational diagnostic; b. courses and programs in pre-vocational and vocational training;

CRITERION NUMBER	
	Legal Standard
	c. site visits, occupational opportunity, work study; d. vocational and career counseling; e. rehabilitation counseling. 18.05(3)5(a-e)
	Rating: Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

As part of the approved Application for Program Reconstruction, the private school indicated that it plans to offer students off-campus work-study opportunities. Progress on this plan is requested.

CRITERION NUMBER	
	Legal Standard
23.2	Vocational program materials are based upon demonstrated need as recommended on the IEP. 18.05(5)a
	Rating: Implemented RESPONSE REQUIRED: No

PRIVATE SCHOOL PROGRAM REVIEW REPORT 2000

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