

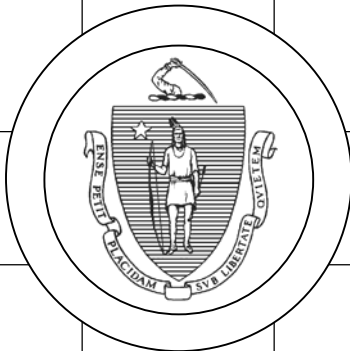


**Compass Day Treatment & Education Program
Compass Short Term Crisis Program**

**PRIVATE SPECIAL EDUCATION SCHOOL
PROGRAM REVIEW
REPORT OF FINDINGS**

**Dates of Onsite Visit: January 28 – February 1, 2002
Date of Draft Report: May 2, 2002
Due Date for Comments: May 20, 2002
Date of Final Report: June 12, 2002
Action Plan Due: July 24, 2002**

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**MASSACHUSETTS DEPARTMENT OF EDUCATION
PRIVATE SPECIAL EDUCATION SCHOOL PROGRAM REVIEW**

Compass School Programs

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MASSACHUSETTS DEPARTMENT OF EDUCATION

APPROVED PRIVATE SCHOOL PROGRAM REVIEW REPORT

OVERVIEW OF REVIEW PROCEDURES

INTRODUCTION

The Massachusetts Department of Education is required under MGL c. 71B, §10 to review special education programs in approved private special education schools that serve publicly funded students under the provisions of Board of Education Regulations 603 CMR 28.00 and 18.00. Each private school submits an application for approval by the Department of Education and periodically updates information included in the application on 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 2001-2002 were notified in September 2001 of scheduled visits and were encouraged to assess themselves before 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 two to three Department staff members conducts a 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 2001, all approved private schools in the Commonwealth will be monitored through the Department's 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 603 CMR 18.00 and 28.00 and the private school's application for approval. The elements selected for the 2001-2002 reviews also include those required by the federal Office for Special Education Programs (OSEP) and revised requirements of the Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 *et seq.* (IDEA-97) as described in the Department's Special Education Advisories issued during the 1997-2001 school years. Selected Program Review compliance criteria are aligned with the requirements and goals of the Massachusetts Education Reform Act of 1993, being intended to promote high standards and achievement for all students.

Report: The Department's Program Review Report is based on a review of documentation 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.
- Interviews of Parent Group representatives.
- Other interviews as requested by personnel from state and local agencies and members of the general public.

- Review of student records: 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 whose files were selected for the record review are provided an opportunity to be interviewed by telephone.
- Observation of classrooms and other facilities: 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 in the findings are commendations for those criteria that have been implemented in an exceptional manner. Where criteria are found not to be fully implemented, the private school must propose corrective action to bring those areas into compliance with the controlling statutes or regulations. Private schools are encouraged to incorporate the corrective action into their program improvement planning, as well as their 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 the general public as a helpful planning document for the continuing development of programs and services in the private school.

REPORT INTRODUCTION

A two-member Massachusetts Department of Education team visited Compass during the week of January 28, 2002 to evaluate the implementation of selected compliance criteria under the Massachusetts Board of Education Regulations 603 CMR 18.00 (Program and Safety Standards for Approved Public or Private Day and Residential Special Education School Programs) and 603 CMR 28.09 (Approval of Public or Private Day and Residential Special Education School Programs), MGL c. 71B (“Chapter 766”) and the federal Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 *et seq.*, 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 features of the school 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 at Compass. These features are as follows:

- *Compass fosters a positive and safe atmosphere where students are respected*
- *Staff are focused on providing students with academic and personal goals they need to succeed in their communities beyond the school*
- *Compass provides extensive support and outreach to families beyond the school day, with activities such as making home visits, accompanying students and families on court appearances and hospital visits and providing families with basic needs such as clothing, food and furniture*
- *Door-to-door transportation is provided by Compass caseworkers which provides students with wrap around services of therapeutic support and structure*
- *Technology at Compass is used to efficiently communicate information on behavioral incidents, restraints, IEPs and progress reports. Students have access to the latest computer technologies and in-house TV programming.*
- *Compass has a comprehensive Violence Prevention Program that includes extensive staff training in crisis management, student education and leadership programs and a close relationship with the Boston Police Department’s Youth Violence Strike Task Force.*
- *Compass partners with Boston English High School, through its Intensive Services Program, to support students transitioning from Compass to public school.*
- *Compass has a scholarship program that provides \$500 annually to each former student who attends college*

Some of the commendations noted above are repeated within the body of the Department’s report under the appropriate compliance criteria.

The Department is submitting the following Private School Program Review Report containing findings made pursuant to this onsite visit. In preparing this report the team reviewed extensive documentation regarding the operation of the school's programs, together with information gathered by means of the following Department program review methods:

- Interviews of three (3) administrative staff.
- Interviews of two (2) clinical staff.
- Interviews of five (5) teaching and educational support services staff.
- Interviews of four (4) child care staff.
- Interviews of one (1) Parent Group representative
- Interview with the Chairperson of the Board of Directors
- Student record review: A sample of fifteen (15) Massachusetts student records was selected by the Department. Student records were first examined by the school’s staff and then verified by the onsite team using standard Department of Education student

- record review procedures to make determinations regarding the implementation of procedural and programmatic requirements.
- Observation of classrooms and other facilities: A sample of eight (8) instructional classrooms and other school facilities used in the delivery of programs and services was visited to determine general levels of compliance with program requirements.

The report includes findings organized under the 18 compliance areas listed in the table of contents. The findings explain the “ratings,” or determinations by the team about the implementation status of the compliance criteria reviewed within each of the 18 areas. The ratings indicate those criteria that were found by the team to be substantially “Implemented” or implemented in a “Commendable” manner. (Refer to the “Definition of Terms” section of the report.) Where criteria were found to be either “Partially Implemented” or “Not Implemented,” the private school must propose to the Department corrective action to bring those areas into compliance with the controlling statute or regulation. In some instances the team may have found certain requirements to be fully “Implemented” but made a specific comment on the school’s implementation methods that also may require response from the private school.

The private school is expected to incorporate the corrective action 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	The criterion is 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.

AREA 1: REQUIRED INFORMATION, NOTIFICATIONS AND POSTINGS

CRITERION NUMBER	Legal Standard
<p style="text-align: center;">1.2</p> <p>Program & Student Description</p> <p>Program Capacity</p> <p>28.09(2)(b) (2, 3, 7)</p>	<p>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:</p> <ul style="list-style-type: none"> a. Operational capacity; b. the identified population of students to be served, including the current and/or projected enrollment, ages of students and their educational and behavioral characteristics; c. philosophy, goals and objectives; d. mechanisms for the delivery of services.
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

Department of Education Findings:

A narrative prepared for this program review incorrectly stated that Compass serves Boston Public School students exclusively. However, the Admissions Policy for the Compass Day Program and student record review indicated that Compass admits students from other public school districts.

CRITERION NUMBER	Legal Standard
<p style="text-align: center;">1.3</p> <p>Program's Curriculum</p> <p>28.09(9)</p>	<p>The private school provides a description of the program's curriculum and general types of staff qualifications that have been established to meet all special education and related services included in students' Individualized Education Programs.</p> <p>Included in the private school's curriculum is a written plan that describes opportunities for students to participate in daily recreational and leisure activities that are appropriate to their ages, interests and needs.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

AREA 2: ADMINISTRATION -- LEGAL AND FINANCIAL DOCUMENTATION

CRITERION NUMBER	
	Legal Standard
<p align="center">2.2</p> <p>Approvals, Licenses, Certificates of Inspection</p> <p>28.09(2)(b)4-5</p> <p>28.09(5)</p> <p>28.09(6)</p> <p>18.04(1)</p> <p>102 CMR 3.06 (4)(b)</p>	<p>Each private school program maintains the following current licenses, approvals, and certificates of inspection by state and local agencies in a place available for public and employee review:</p> <ul style="list-style-type: none"> a. Building occupancy* b. Safety inspection in all buildings by the Department of Public Safety or local building inspector c. Annual fire safety inspection by local fire department* d. Lead paint inspection (if applicable);* (102 C.M.R. 3.06(4)(b): “All buildings, residential or otherwise, utilized by children age six years and under or with a mental age of six years and under shall be free of lead paint.”) e. Health safety* f. Approval by local school committee (per MGL c. 76, s. 1) g. Approval by OCCS to operate a group care facility or a special education day care center (if applicable)* h. Asbestos inspection i. PCB inspection j. Other inspections that may be required by local or state authorities k. (If applicable) a statement as to whether previous application has been made for approval, and the action on it <p>*A program with a residential component may submit the most recent OCCS license in fulfillment of those requirements marked with an asterisk (*).</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p align="center">2.3</p> <p>OCCS License (Not applicable to Day Schools)</p>	<p>Each private school program has a current full license from the Office of Child Care Services (OCCS) (per 102 CMR 3.00) to operate as a residential school.</p>
	<p>Rating: Not applicable RESPONSE REQUIRED: No</p>

Department of Education Comment: *Compass is not a residential school.*

AREA 3: ADMINISTRATION -- MANUALS AND HANDBOOKS

CRITERION NUMBER	Legal Standard
<p>3.1 3.2 3.3</p> <p>Policies and Procedures Manuals</p> <p>28.09(11)(b) 18.05(9)(d)</p>	<p>The private school maintains on site Policies and Procedures Manuals* that include:</p> <ol style="list-style-type: none"> 1. An overall manual containing policies and procedures including, but not limited to: <ol style="list-style-type: none"> a. Student Admissions b. Child Abuse/Neglect c. Student Discipline/Behavior Management d. Coordination/Collaboration with School Districts e. Emergency Procedures f. Educational Program Procedures g. Parent and Student Involvement h. Personnel Policies and Procedures i. Student Protections j. Student Records k. Research, Experimentation, Fund Raising, Publicity, Observation l. Suspension and Termination m. Staff Training n. Student Transportation and transportation safety 2. The program maintains a written and current health care policies and procedures manual containing all required health-related policies and procedures, and approved by the health care consultant. The manual is readily available to all staff and addresses the following: <ol style="list-style-type: none"> a. Training of all direct service staff by a certified instructor for CPR certification and in basic and emergency first aid; b. secure storage of adequate first aid supplies, including but not limited to bandages, body substance isolation gloves, 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. 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 (These should also be posted conspicuously throughout the buildings.); 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; h. the procedures to be followed in the case of illness or emergency if the parents cannot be reached; i. a plan to ensure that vision, hearing postural and other required screening are

CRITERION NUMBER	
	<p style="text-align: center;">Legal Standard</p> <p>conducted in accordance with M.G.L. c. 71 s 57;</p> <ul style="list-style-type: none"> j. a written policy developed by the school for protecting students from exposure to foods, chemicals and other material to which they may be allergic. k. narrative description of provision of medical, nursing, and infirmary care; l. a written policy describing the administration of medications, per DPH regulations; m. administration of anti-psychotic medications including, where appropriate, “Rogers Procedures”; n. notification to appropriate parties of student-specific health-related incidents, injury, hospitalization, death ; o. notification to appropriate parties of systemic health-related problems/issues; p. no smoking policy (see Assurance on this subject); q. plan for preventive health care of students; r. toileting procedures s. name and contact information for consultant physician and emergency contacts. <p>3. Special Education Regulations and Reference Materials contain at least the following documents:</p> <ul style="list-style-type: none"> a. Federal IDEA regulations: 34 CFR 300.300-.577 b. Appendix A to the above federal regulations. c. State regulations: 603 CMR 28.00 and 603 CMR 18.00 d. DOE IEP Process Guide and IEP Forms e. State restraint regulations (for day schools) <p>*Private schools shall provide written notice to parents of enrolled students that copies of policies and procedures are available upon request.</p>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation review indicated that while Compass has developed required policies, such policies are not included in a Policies and Procedures Manual. Compass did not provide evidence that written notice is made to parents that copies of these policies and procedures are made available to parents upon request.

CRITERION NUMBER	
	Legal Standard
	<p>student</p> <p>h. any action taken by a federal, state or local agency that might jeopardize the school's approval with DOE</p> <p>i. any legal proceeding brought against the school or employee arising out of circumstances related to the care or education of any student in the school regardless of state of residency.</p>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation review and interviews indicated that Compass School has notified the Department of Education of serious incidents but has not used the Department of Education's required form 2 for these notifications.

AREA 5: ADMISSIONS PROCEDURES AND COORDINATION/COLLABORATION WITH SCHOOL DISTRICTS

CRITERION NUMBER	
	Legal Standard
<p>5.1</p> <p>Student Admissions</p> <p>28.09(11)</p>	<p>The private school develops and implements written admissions criteria, policies and procedures that include the following:</p> <p>a. copies of the school's policies and procedures that must be provided to the student (if appropriate), parents and the placing public school district prior to admission of the student;</p> <p>b. documentation from a licensed physician of a complete physical examination of the student not more than twelve (12) months prior to admission. In the event of emergency placements, the school shall make provisions for a complete examination of the student within thirty (30) days of admission;</p> <p>c. a complete and thorough description of the interview process; and</p> <p>d. consent forms.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
5.2	The private school works collaboratively with the placing public school district to

CRITERION NUMBER	
	Legal Standard
<p>Policies and Procedures for Coordination and Collaboration with Public School Districts</p> <p>28.06 (2-3) 28.09(9)(c)& (d) 28.09(2)(b)7</p> <p>Federal Regulations:</p> <p>34 CFR 300.349 and 300.400-401</p>	<p>ensure that, to the maximum extent appropriate, children with disabilities are provided opportunities to be educated and to socialize with children who do not have disabilities, are provided access to the general education programs, and are given opportunities to return to a less restrictive educational program.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p>5.3</p> <p>Contents of Coordination and Collaboration with Public School Districts</p> <p>28.06(2-3) 28.07(5) 28.09(9)(c) &(d) 28.09(2)(b)(7)</p> <p>34 CFR</p>	<p>The private school has policies/procedures that describe roles and responsibilities of all staff as well as general communication/coordination/collaboration procedures that address the following:</p> <ul style="list-style-type: none"> a. consideration of possible placement, admissions process; b. IEP development and implementation and roles in 3-year eligibility re-determinations; c. Contents and general arrangements for executing contracts with placing school districts; d. Participation of the private or public school program as well as school district representatives at the TEAM and other key meetings, including reviewing/revising the IEP; e. Written progress reports; f. Documentation regarding student-related developments, including matters involving students' behavioral plans, functional behavioral assessments, manifestation determinations, imposition of discipline, etc. g. Administration of tests; h. Preparations that are made for the student's return to a public school or other less

CRITERION NUMBER	
	Legal Standard
300.349 and 300.400-401	restrictive setting; i. Preparations for students approaching or reaching ages 14, 16 and 18, later education, and adult life, consistent with IDEA “transition” requirements and state age-of-majority law and j. school district monitoring of student progress.
	Rating: Partially implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that Compass’s written policy and procedures on collaboration with the public schools does not include required elements e-j listed above.

CRITERION NUMBER	
	Legal Standard
5.4 Training 18.05(11)(g)(h)	All staff with school district contact responsibility are trained regarding their particular roles and responsibilities.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
5.5 Staff Coordinator 28.09(7)	A senior person is designated to communicate and work effectively with all public school districts that have placed students in the program.
	Rating: Implemented RESPONSE REQUIRED: No

AREA 6: EDUCATIONAL PROGRAM REQUIREMENTS -- STUDENT LEARNING TIME

CRITERION NUMBER	
	Legal Standard
6.1 Daily Instructional Hours 603 CMR 27.00	The private school provides an average annual minimum of the following instructional hours: a. Elementary: 5 hours per school day b. Secondary: 5 ½ hours per school day
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
6.2 School Days per Year 28.09(9)	The private special education program is conducted for the following days (exclusive of weekends, holidays, vacations): a. 10 month program- 180 days b. 11 month program- 198 days c. 12 month program- 216 days
	Rating: Implemented RESPONSE REQUIRED: No

AREA 7: EDUCATIONAL PROGRAM REQUIREMENTS -- CURRICULUM FRAMEWORKS AND STATE ASSESSMENTS

CRITERION NUMBER	
	Legal Standard
7.1	1. Private school personnel reflect a full understanding of the connection between

CRITERION NUMBER	
	Legal Standard
Curriculum Frameworks 28.09(9)(b)	the Massachusetts Curriculum Frameworks and the expectations of the state for student performance as well as the rights of students with disabilities to be full participants in the general curriculum. 2. The private school has either aligned its curriculum with the Frameworks or has taken steps to provide students (including all students with disabilities) with essential learning opportunities that prepare the students to reach the state graduation standards.
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Documentation review indicated Compass has worked for four years with consultants to align the school-wide curriculum with Massachusetts curriculum frameworks. At this point, Compass has developed years one and two of Science and Languages Arts and is working to bring all curriculum areas into alignment with Massachusetts curriculum frameworks.

CRITERION NUMBER	
	Legal Standard
7.2 Staff Training 28.09(9)(b)	The private school shall ensure that all staff responsible for implementing services as specified on students' Individualized Education Programs have an understanding and knowledge of the general curriculum expectations and learning standards of the Massachusetts Curriculum Frameworks and shall incorporate such knowledge into the school's educational program.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Interviews indicated that not all staff responsible for implementing services as specified on students' Individualized Education Programs have an understanding and knowledge of the curriculum expectations and learning standards of the Massachusetts Curriculum Frameworks.

CRITERION NUMBER	
	Legal Standard
7.3 State/District Wide Assessments 28.09(9)(d)	The private school has written procedures outlining how the school will ensure that all enrolled students participate in state and/or district wide assessments in accordance with the assessment participation information provided on the student's IEP. Such procedures shall include how the approved program will provide for MCAS testing accommodations and/or administration of alternate assessments when required.

CRITERION NUMBER	
	Legal Standard
	Rating: Implemented RESPONSE REQUIRED: No

AREA 8: EDUCATIONAL PROGRAM REQUIREMENTS -- INDIVIDUALIZED EDUCATION PROGRAMS

CRITERION NUMBER	
	Legal Standard
8.1 Implement- ation -- Educational Services 28.04 and 28.09(8) 34 CFR 300.24	<p>The private school specifies how each of the following educational services are implemented for the described student population of the school:</p> <ul style="list-style-type: none"> a. All Massachusetts Curriculum Frameworks b. Curriculum of the Placing District including high school graduation requirements c. Self-help, Daily Living Skills d. Social/Emotional Needs e. Physical Education; Adapted Physical Education f. Pre-Vocational, Vocational, and Career Education g. Other: any other specialized educational service(s) provided by the program
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.2 Implementa- tion – Related Services 28.04 and 28.09(8)	<p>The private school specifies how each of the following related services is implemented for the described student population of the school:</p> <ul style="list-style-type: none"> a. Transportation b. Braille Needs (blind/visually impaired) c. Assistive Technology Devices/Services d. Communication Needs (all students) e. Communication Needs (deaf/hard of hearing students) f. Language Needs (Limited English Proficient students)

CRITERION NUMBER	
	Legal Standard
34 CFR 300.24	<ul style="list-style-type: none"> g. Physical Therapy h. Occupational Therapy i. Recreation Services j. Mobility/Orientation Training k. Psychological Services, Counseling Services, Rehabilitation Counseling Services, Social Work Services l. Parent Counseling and Training m. School Health Services, Medical Services n. Social Work Services o. Other (music therapy, sensory integration therapy) <p>(Related services are defined in the federal regulations as those services which are developmental and corrective as well as supportive services that <u>assist a child to benefit from</u> special education and/or access the general curriculum.)</p>
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Student record review and interviews indicated that students in the Short Term Crisis Program are not always receiving occupational therapy services as required by their individualized education plan.

CRITERION NUMBER	
	Legal Standard
8.3 Implementation – Supplementary Aids/Services 34 CFR 300.28	The private school provides examples (through a list or narrative) of the kinds of supplementary aids and services that are available for students in the program.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.4 Current IEP & Student Roster	The private school has on file a current IEP for each enrolled Massachusetts student that has been issued by the responsible public school district and consented to by the student’s parent(s) (or student in applicable situations) for each student enrolled in the program.

CRITERION NUMBER	
	Legal Standard
28.09	
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Student record and documentation review indicated that not all students have a current IEP on file. Some students in the Short Term Crisis Program have IEPs written for a placement other than Compass. Some students in the Short Term Crisis Program have exceeded their 45 days for an alternative placement and remain in the placement without an IEP that reflects their present program.

CRITERION NUMBER	
	Legal Standard
8.5	
Education Case Manager	The private school program assigns an educational case manager to each student.
28.09	
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.6	
IEP Implementation	The private school program implements all services on the students' IEP.
28.09	
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

See comment under criterion 8.4 regarding occupational therapy services.

CRITERION NUMBER	
	Legal Standard
8.7	The private school program sends copies, at least quarterly, of education progress

CRITERION NUMBER	
	Legal Standard
<p data-bbox="240 380 342 474">IEP- Progress Reports</p> <p data-bbox="240 516 342 548">28.07(3)</p> <p data-bbox="207 579 375 747">20 U.S.C. Chapter 33, Section 1414(d)(1)(A) (viii)</p> <p data-bbox="240 779 342 842">34 CFR 300.347</p>	<p data-bbox="407 348 1404 474">reports to the parents and public school. Such reports include written information on the student's progress toward the annual goals in the IEP, including information on the extent to which such progress is sufficient to enable the child to achieve the goals by the end of the year.</p> <p data-bbox="407 485 1242 537">Copies of progress reports are maintained in student records, including documentation of persons or agencies receiving such reports.</p>
	<p data-bbox="407 852 792 884">Rating: Partially Implemented</p> <p data-bbox="919 852 1349 884">RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Student record reviewed indicated that progress report narratives do not consistently include written information on the student's progress toward the annual goals on the IEP, including information on whether the student's progress is sufficient to enable the child to achieve IEP goals by the end of the IEP period.

CRITERION NUMBER	
	Legal Standard
<p data-bbox="272 1331 310 1362">8.8</p> <p data-bbox="207 1394 375 1499">IEP- Revisions and Changes</p> <p data-bbox="215 1530 367 1562">34 CFR 300</p>	<p data-bbox="407 1331 1404 1436">The private school notifies the public school and parents whenever the IEP needs to be revised to reflect a change in goals, placement, or a return to a less restrictive setting.</p> <p data-bbox="407 1467 1404 1530">In no case does the private school conduct a Team meeting without the authorization and presence of an administrative representative of the responsible school district.</p> <p data-bbox="407 1562 1284 1593">In no case does the private school issue a new or revised IEP for a student.</p>
	<p data-bbox="407 1608 792 1640">Rating: Partially Implemented</p> <p data-bbox="919 1608 1349 1640">RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Student record review indicated that the IEP for some students in the Short Term Crisis Program are not written to reflect the student's current placement at Compass.

CRITERION NUMBER	

**AREA 9: EDUCATIONAL PROGRAM REQUIREMENTS -- STUDENT DISCIPLINE
AND BEHAVIOR MANAGEMENT**

CRITERION NUMBER	
	Legal Standard
9.1 Policies and Procedures 18.05(5)	The private school develops a comprehensive set of policies and procedures dealing with discipline and behavior management that meet all federal special education requirements, and all applicable state and federal requirements pertaining to the use of restraint. (See Criterion 9.4 below.) These policies and procedures are consistently implemented.
	Rating: Implemented RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
9.3 Runaway Students 18.03(10)	The private special education program has developed a written policy, including a definition of runaways, appropriate for the school population and location, as well as procedures for handling students who runaway. This policy is approved by the Department of Education. The school notifies the Department and parents immediately whenever any student runs away.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review and staff interviews indicated that Compass does not include the definition of a runaway, timelines, and requirements to notify appropriate individuals and agencies in its written policy on runaways.

CRITERION NUMBER	
	Legal Standard
9.4 Restraints	A private day educational program approved has developed a policy on the use of physical restraint and administers physical restraint in accordance with the requirements of 603 CMR 46.00.
18.05 (5)(h) 603 CMR 46.00	A residential educational program complies with the OCCS restraint requirements contained in 102 CMR 3.00 for all students enrolled in such program.
102 CMR 3.00	A private school educational program within a program or facility subject to M.G.L. c. 123 or Department of Mental Health Regulations complies with the restraint requirements of M.G.L. c. 123, 104 CMR 27.12 or 104 CMR 28.05, where applicable.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
9.5 3-5 Day Suspensions 18.05(6)	<p>Upon admission of a student, the private special education program provides a written policy on suspensions to the parents, and the school district and human service agency that placed the student. Such policy shall also contain the following:</p> <ul style="list-style-type: none"> a. Whenever a student is suspended, the school shall immediately notify the parents and the public school or human service agency responsible for the placement. Within 24 hours, the school shall send a written statement explaining the reasons for suspension to the parents and public school district. b. No student may be suspended and sent home unless a responsible adult is available to receive the student. c. Once a student has been suspended for three (3) consecutive school days or five (5) non-consecutive school days in a school year, the school, parents, and public school district, consistent with federal requirements, shall explore together all possible program modifications within the school in an attempt to prevent more lengthy suspension of the student from the program. d. Procedures must be in place to record and track the number and duration of suspensions, including suspensions from any part of the student’s IEP program (including transportation). <p>NOTE: Sending a student home “early” is considered a suspension if the student’s IEP does not allow for the modification of learning time requirements of the Board of Education.</p>
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
	<p>placing public school district, termination of enrollment may be delayed for longer than two calendar weeks.</p> <p>c. For <u>planned</u> terminations, the private special education program notifies the public school district of the need for an IEP review meeting and provides notice of this meeting to all appropriate parties ten (10) days in advance of the intended date of the meeting. The purpose of the meeting will be to develop a clear and specific termination plan for the student that shall be implemented in no less than thirty (30) days unless all parties agree to an earlier termination date.</p> <p>d. For <u>emergency</u> terminations, which are circumstances where the student presents a clear and present threat to the health and safety of him/herself or others, the program follows the procedures required under 603 CMR 28.09(12)(b) and immediately notifies the Department of Education.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

AREA 10: EDUCATIONAL STAFFING REQUIREMENTS -- STUDENT:TEACHER AND STUDENT:CHILDCARE WORKER RATIOS

CRITERION NUMBER	
	Legal Standard
<p>10.1</p> <p>Student: Teacher Ratios</p> <p>28.06(6)(d)&(g) 28.09(7)(e)</p>	<p>Unless otherwise approved by the Department of Education, the private special education program ensures that instructional groupings do not exceed:</p> <p>a. 8 students to one certified teacher without an aide, or</p> <p>b. 12 students to one certified teacher with an aide.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard

CRITERION NUMBER	
	Legal Standard
10.2 Age Range	The program ensures that the ages of the youngest and oldest child in any instructional grouping do not differ by more than forty-eight months (4 years).
28.06(6)(f)	(NOTE: No waiver of this requirement can be approved by the Department of Education.)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews indicated that age range of students in one high school classroom exceeds forty-eight months.

CRITERION NUMBER	
	Legal Standard
10.3 Programs for Young Children	The program ensures that any and all substantially separate classrooms for young children (3 and 4 year olds) do not exceed nine (9) students with one teacher and one aide.
28.09(7)(e) 28.06(7)	
	Rating: Not applicable RESPONSE REQUIRED: No

Department of Education Comment:

Compass does not serve students age 3 and 4.

CRITERION NUMBER	
	Legal Standard
10.4 Student: Child Care Ratios	The program has a student to child care worker ratio of: a. not lower than 4:1 nor greater than 6:1 during non-“school day” waking hours, and b. not lower than 6:1 nor greater than 8:1 during sleeping hours.
28.09(7) 18.01(2)	
	Rating: Not applicable RESPONSE REQUIRED: No

Department of Education Comment:

Compass is not a residential school.

CRITERION NUMBER	
	Legal Standard
10.5 Alternative Ratios 18.03(2)	Where applicable, the private special education program has submitted a justification for alternative ratios for student to childcare workers, and the Department has approved these.
	Rating: Not applicable RESPONSE REQUIRED: No

Department of Education Comment:
Compass is not a residential school.

AREA 11: EDUCATIONAL STAFFING REQUIREMENTS -- PERSONNEL POLICIES, QUALIFICATIONS, RESPONSIBILITIES

CRITERION NUMBER	
	Legal Standard
11.1 Personnel Policies 28.09(7) 28.09(11)(f) 18.05(11)	The private special education program has developed written personnel policies and procedures that describe: <ul style="list-style-type: none"> a. Criteria and procedures for hiring, written evaluations, suspension or dismissal of any staff person; and development of teacher and staff evaluation forms; b. Procedures for handling staff complaints; c. Provisions for vacations, holidays, leaves, sick days, and any other benefits offered by the program; d. A plan for using volunteer and/or intern services; e. Equal employment/educational opportunities/affirmative action in regard to race, color, creed, national origin, sex, sexual orientation and handicap; and f. Procedures for screening prospective and current staff members whose responsibilities at the school provide them with the opportunity for unsupervised contact with students and for updating this information at least every three years. (This should include, but not be limited to, use of Massachusetts' CORI system.)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
18.05(11)(f)	<p>appropriate to the population served at the school; other teaching staff are certified as appropriate in other educational areas in order to provide for content expertise in the general curriculum.</p> <p>c. Where required by the Department of Education, the private school employs a higher proportion of certified special educators where the population of students requires more specialized services.</p> <p>d. To the extent that teaching staff is providing special education services, such services are provided, designed, or supervised by a special educator.</p>
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews indicated that not all teachers for whom the school has applied for a waiver understand their obligation to attend three college courses a year as a stipulation of receiving a waiver for their position.

CRITERION NUMBER	
	Legal Standard
11.5 Related Services Staff	All staff providing or supervising the provision of related services are appropriately certified, licensed or registered by their respective state boards or professional associations.
28.09(7)(d)	
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.6 Master Staff Roster	The private school maintains a master list of ALL staff for every position within the program. This list includes job titles together with corresponding UFR title numbers and full-time equivalents (FTE's).
28.09(7)	
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.9 Organizational Structure 28.09(7) 28.07(c)	The program demonstrates that its organizational structure provides for the effective and efficient operation of the school, supervision of school staff and supervision of students.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.10 Supervision of Child Care Workers (Direct Care Staff) 18.03(4)	Each program provides for ongoing and regular supervision of all child care workers by a professional staff person who has supervisory and administrative responsibility within the school.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.11 Supervision of Students 28.09(7) 18.03(1)	<p>The private school program develops and implements a detailed plan that describes how appropriate supervision is provided to students while they are engaged in any school-related activity on and off school grounds.</p> <p>This plan includes arrangements for individual and group recreational programs appropriate to the age, interests, and needs of each student with assigned staff as appropriate.</p>
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER			
	Legal Standard		
<p data-bbox="256 380 326 407">11.12</p> <p data-bbox="204 478 378 543">Plan for Staff Coverage</p> <p data-bbox="215 579 367 606">18.03(1)(b)4</p>	<p data-bbox="407 380 1398 474">Each private special education program provides a detailed description of how the school will provide childcare and/or overall staff coverage in the absence of workers due to illness, staff vacancies, emergencies, or other unexpected circumstances.</p>		
	Rating: Not Implemented	RESPONSE REQUIRED:	Yes

Department of Education Findings:

Documentation review indicated that the policy Compass submitted for this criterion references student supervision but does not detail how staff coverage will be maintained in the case of absence of workers due to illness, staff vacancies or emergencies.

AREA 12: EDUCATIONAL STAFFING REQUIREMENTS -- STAFF TRAINING

CRITERION NUMBER			
	Legal Standard		
<p data-bbox="264 1352 321 1379">12.1</p> <p data-bbox="215 1419 367 1518">Staff Orientation Training</p> <p data-bbox="215 1551 367 1579">18.05(11)(g)</p>	<p data-bbox="407 1352 1377 1482">The private special education program develops a written plan for staff orientation and provides an orientation-training program for all new staff to ensure an understanding of the school’s philosophy, organization, program, practices and goals.</p> <p data-bbox="407 1520 1365 1614">The written plan shall describe how newly hired staff are provided training on all required topics at the time of hire if the required topics have already been covered with existing staff.</p> <p data-bbox="407 1652 1305 1717">New staff are not be assigned direct care duties with students until they have participated in all mandated training through their orientation program.</p>		
	Rating: Implemented	RESPONSE REQUIRED:	No

CRITERION NUMBER	
	Legal Standard
<p>12.2</p> <p>Annual In-Service Training Plan and Calendar</p> <p>28.09(7)(f)</p> <p>18.05(11)(h)</p>	<p>The private special education program develops and implements a written plan for staff orientation and training that is consistent with the needs of the student population, appropriate to the role of each staff member and provides, on average, at least two (2) hours per month of relevant training for all staff including non-professional staff (child care workers/direct care staff on all shifts). Staff input is elicited and considered.</p> <p>The following topics are required in-service training topics and are offered annually to all staff providing direct care services to students:</p> <ul style="list-style-type: none"> a. Reporting abuse and neglect of students to the Department of Social Services (51-A) and/or the Disabled Persons Protection Commission (See also, 12.2 (b), below.) b. Emergency first aid training by a certified instructor and, where specifically required by the Department of Education, certification in CPR (See also, 12.2 (c), below.) c. Medication administration (including, but not limited to, administration of antipsychotic medications, discussions of medications students are currently taking and their possible side effects) (See also, 12.2 (d), below.) d. Transportation safety (if applicable) e. Student record policies and confidentiality issues (See also, 12.2 (e), below.) f. Evacuation policies and emergency procedures including, but not limited to, utilization of the alarm system, evacuations in instances of fire or natural disaster (See also, 12.2 (f), below.) g. Behavior management policies and procedures used by the program such as positive reinforcement, point/level systems, token economies, time-out procedures (See also, Area 9 and 12.2(a)) h. Restraint procedures including de-escalation methods used by the program (See also, 9.4 above.) i. Curriculum alignment with the Massachusetts Curriculum Frameworks, and j. Procedures for inclusion of all students in MCAS testing and/or alternate assessments.
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p>12.2 (a)</p> <p>Behavior Management and Restraint</p>	<p>Training of Behavior Management and Suspension and Termination procedures includes:</p> <ul style="list-style-type: none"> a. Program’s student conduct/discipline code; b. Description of safeguards for students’ emotional, physical, and psychological well-being;

CRITERION NUMBER	
	Legal Standard
Training 28.09(11) 18.05(5)	c. Policies on use of time-out procedures; d. Techniques for dealing with disruptive and violent behavior including skill training on the proper use of non-violent restraint. e. Detailed procedures pertaining to the use of any type of restraint, which must meet or exceed any requirements in applicable state regulations or policy; (NOTE: OCCS residential regulations on behavior management, including restraint and time-out, are found at 102 CMR 3.07(7). The provisions relating to restraint are expanded in EOHHS/OCCS’s “Guidelines for Physical Restraint” issued 1/11/00. DMH regulations re restraint may apply to schools serving DMH clients. DOE Regulations on the Use of Restraints in Publicly Funded Education Programs [603 CMR Section 46.00] apply to a private day programs approved by the Department of Education where such program does not hold the approval of the Department of Education as a residential school.) f. Procedures for obtaining and recording data regarding student discipline and behavior along with a description of how such data will be integrated into IEP Team discussions. g. Procedures for obtaining parental consent, if appropriate.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
12.2 (b) Child Abuse Reporting 18.05(9)(j)	The program has written procedures and staff training for the reporting of suspected child/student abuse or neglect to the Department of Social Services (MGL c.119, s. 51A) and the Disabled Persons Protection Commission (MGL c. 19C). Such procedures include notification to the Department of Education when a report is filed against the program or its employee(s) or student(s).
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
12.2 (c) Emergency First Aid Training and CPR	The program develops written policies and procedures for annual basic/emergency first aid training for all direct care staff. Where specifically required by the Department of Education, direct care personnel maintain appropriate CPR certification.

CRITERION NUMBER	
	Legal Standard
Certification 18.05(9)(e)	
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
12.2 (d) Medication Training 18.05(9)(f)(3) (c)	Training by a physician or registered nurse is given to all staff providing care and instruction to students receiving medication. The training includes the nature of the medication, potential side effects and any special precautions or requirements.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
12.2 (e) Student Record Training 28.09(10)	The private school keeps current and complete files for each publicly funded enrolled student and manages such files consistent with the Massachusetts Student Record Regulations (603 CMR 23.00) and MGL c. 71, s. 34H.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
12.2 (f) Emergency Procedures Training	All staff are trained relative to emergency procedures, evacuation policies and procedures and in the use of the alarm system and equipment such as fire extinguishers. The program conducts at least two evacuation drills per shift at each location annually (including all day programs, and residences in the evening and overnight)

CRITERION NUMBER	
	Legal Standard
12.2 (i) Staff Evaluations 18.05(11)(c)1.	Written performance evaluations are maintained on all staff. Personnel are evaluated annually.
	Rating: Implemented RESPONSE REQUIRED: No

AREA 13: PHYSICAL FACILITY AND EQUIPMENT REQUIREMENTS
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CRITERION NUMBER	
	Legal Standard
13.1 Educational Facilities and Materials 29.09(8)	The private special education program provides the facilities, textbooks, equipment, technology, materials and supplies needed to provide the special education and related services specified on the IEPs of enrolled students.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
13.3 Physical Facility/ Architectural Barriers 18.04(8)	<p>The private special education program assures that students with limited mobility have access, free from barriers to their mobility, to those areas of the school buildings and grounds to which such access is necessary for the implementation of the IEPs for such students. All schools receiving federal funds shall meet the requirements of Section 504 of the Rehabilitation Act of 1973.</p> <p>If any part of the program is not accessible to students with limited physical mobility, a plan and timetable is provided that describes how the school will make all programs and appropriate buildings accessible.</p>
	Rating: Implemented RESPONSE REQUIRED: No

AREA 15: PARENT AND STUDENT INVOLVEMENT

CRITERION NUMBER	
	Legal Standard
15.1 Parent Involvement and Parents' Advisory Group 18.05(4)(a)	<p>The private special education program has developed a written plan for involving parents. The private school has a Parents' Advisory Group that advises the group on matters that pertain to the education, health and safety of the students in the program.</p> <p>The program has designated a staff person to support the Parents' Advisory Group.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation review and interviews indicate that Compass has started a Parent's Advisory Group. It is commendable that Compass provides transportation to these meetings and childcare during the meetings. A goal of this group is to have parents advise parents and school staff on matters that pertain to education health and safety of the Compass students.

CRITERION NUMBER	
	Legal Standard
15.2 Orientation Procedures 28.09(11)	<p>The school has developed and implemented orientation procedures for parents and students upon student admission to the program.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
15.3 Change of	<p>The school has a procedure for assuring that it is informed by a parent or guardian of any changes in a student's legal status and of the results of all judicial and</p>

CRITERION NUMBER	
	Legal Standard
Student's Legal Status	administrative proceedings concerning the student, and for disseminating this information to appropriate personnel.
18.05(4)(b)	(See also Criterion 15.6.)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that Compass does not have formal written procedures for assuring that it is informed by a parent or guardian of any changes in a student's legal status or the results of judicial and administrative proceedings concerning a student.

CRITERION NUMBER	
	Legal Standard
15.4	The private school program notifies the placing school district when multiple efforts have been made, yet have failed to involve the parent and obtain necessary parental consent. Matters requiring parental consent include, but are not limited to, the following:
Parent Consent	
28.07(1)(b)	<ul style="list-style-type: none"> a. IEP-related matters b. emergency medical care c. medications d. restraints e. publicity, research, evaluation and f. field trips.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
15.5	The private school program collaborates with the placing school district to ensure student participation in Team meetings where required by law and if appropriate. If the student does not attend the IEP meeting, steps are taken to ensure that the student's preferences and interests are considered.
Student Involvement	
34 CFR 300.344	
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
Health Care Policy and Procedure Manual 18.05(9)(c) 18.05(9)(d)	students. This manual is approved by the health care consultant, includes all applicable policies and procedures, and is made available to staff.
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Comment:

Documentation indicated that Compass School has a School Health Manual and has developed comprehensive written health care policies and procedures that meet the Department of Education regulations. These Department of Education health care policies must be placed in the School Health Manual.

CRITERION NUMBER	
	Legal Standard
16.2 Physician Consultation 18.05(9)(a)	The school has secured the services of a licensed physician available for consultation.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
16.3 Nursing 18.05(9)(b)	The school has secured the services of a registered nurse or a licensed practical nurse available as deemed necessary by the Department depending upon the health care needs of the school population. (See Criterion 3.2 above.)
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">16.4</p> <p>Emergency First Aid</p> <p>18.05(9)(e)</p>	<p>The school has developed written policies and procedures for emergency first aid and care including:</p> <ul style="list-style-type: none"> a. training of all direct service staff in emergency first aid; b. secure storage of adequate first aid supplies, including but not limited to bandages, body substance isolation gloves, 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 (such as a motor vehicle accident), 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 medical care 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.
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">16.5</p> <p>Administration of Medication</p> <p>18.05(9)(f)</p>	<p>The school has developed and implements written policies and procedures regarding the administration of medication including, but not limited to, the following:</p> <ul style="list-style-type: none"> a. no medication is administered to a student without written authorization from a parent. Such authorization shall be renewed annually; b. no prescription medication shall be administered to a student without the written order of the physician prescribing the medication to that student; c. the school maintains written policies and procedures regarding prescriptions and administrations of medication including authorization, prepackaging and staff training; d. any change of medication or dosage must be authorized by a new order from a physician; e. a written record of the administration of prescribed medication to students shall be 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; f. all medicine shall be kept in a locked, secure cabinet and labeled with the student's name, the name of the drug and the directions for its administration. The school shall dispose of or return to the parents any unused medication. Medications must be delivered to the school by a responsible adult in a container

CRITERION NUMBER	
	Legal Standard
Medical Treatment-Religious Beliefs 18.05(9)(k)	to receive medical treatment when the parents object thereto on the ground that such treatment conflicts with a religious belief.
	Rating: Implemented RESPONSE REQUIRED: No

AREA 17: TRANSPORTATION SAFETY

CRITERION NUMBER	
	Legal Standard
17.1 Transportation Safety 28.09(11)(b)	<p>The program develops transportation procedures that ensure vehicles are safe, insured, and operated by qualified and trained individuals, and that students are transported in a safe manner that is responsive to individual student’s needs and provisions of their IEPs.</p> <p>In the event of a motor vehicle accident, parents, school districts, human service agencies, and the Department of Education are notified immediately.</p> <p>The school ensures that <u>any</u> person who is responsible for operating a vehicle owned or contracted for by the school and carrying students, shall receive in-service training on overall transportation safety and the individual needs of the students they transport.</p>
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Document review indicated that Compass’s transportation policy does not state that parents, school districts and other human service agencies are notified in the event of an accident. Compass’ transportation policy states that the Department of Education will be notified within in 24 hours, however the Department of Education requires immediate notification of all required parties.

CRITERION NUMBER	
	Legal Standard
	<p style="padding-left: 40px;">emergency (names, addresses, telephone numbers)</p> <ul style="list-style-type: none"> • Educational surrogate contact information (if applicable) • Date of last complete physical health examination by physician • Notation of allergies and/or any other medical condition affecting student's well-being, e.g., seizures • Medications • Information specific to this student re handling of medical emergencies <p>c. copy of IEP;</p> <p>d. copies of quarterly progress reports and any modification of the IEP;</p> <p>e. copy of the student's termination or discharge plan;</p> <p>f. health records, including reports, documentation of physical examinations, allergies, screening tests, results of medical care;</p> <p>g. all evaluations or assessments conducted of the student;</p> <p>h. pertinent correspondence concerning the student;</p> <p>i. information regarding the use of behavior management interventions including, but not limited to, restraint (chemical, mechanical, physical) and time-out procedures; and</p> <p>j. copies of all incident reports.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

PRIVATE SCHOOL PROGRAM REVIEW REPORT 2002.doc

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