

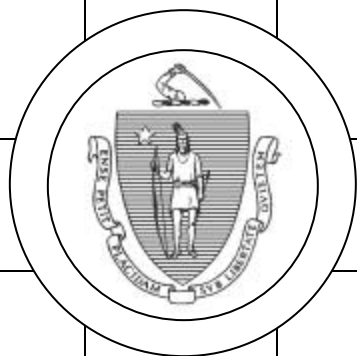


THE HOME FOR LITTLE WANDERERS
Baird Center Day School
Baird Center Residential Center
Clifford School at Longview Farm
Knight Children's Center
Orchard School

PRIVATE SPECIAL EDUCATION SCHOOL
PROGRAM REVIEW
REPORT OF FINDINGS

Dates of Onsite Visit: June 3-7, 2002
Date of Draft Report: January 14, 2003
Due Date for Comments: January 31, 2003
Date of Final Report: March 4, 2003
Action Plan Due: April 18, 2003

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

THE HOME FOR LITTLE WANDERERS

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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 und 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 four-member Massachusetts Department of Education team visited the Home for Little Wanderers during the week of June 3, 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 the Home for Little Wanderers. These features are as follows:

- *The Home for Little Wanderers offers an array of therapeutic services including the use consulting and on-site psychiatric services, individual, family and topic-specific group therapies tailored to individual student needs*
- *Efforts made by each program to coordinate and communicate the educational, clinical and residential services and needs of each student are commendable*
- *The dedication and commitment of staff ensures the safety of students and promotes a nurturing, caring environment.*
- *The Activity schedule at the residential program at Longview is thoughtfully planned using input from staff and students. The structured schedule at the residence provides an environment that allows students to thrive in a variety of activities and meet with success.*
- *The tie of academics (math and history) to the curriculum of the woodshop at Baird is commendable as are the small engines and woodworking offerings to students at Longview Farms.*

• *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 twelve (12) administrative staff
- Interviews of twelve (12) clinical staff
- Interviews of sixteen (16) teaching and educational support services staff.
- Interviews of twelve (12) child care staff.
- Interviews of three (3) parent representatives
- Student record review: A sample of twenty (20) 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: All instructional classrooms and other school facilities used in the delivery of programs and services were 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: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation submitted to the Department of Education indicated that Orchard School states it “serves students ages 12-17,” however the student roster submitted as part of this review indicated that Orchard School has one student currently enrolled who is 18.8 year old.

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: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation review indicated that only the Baird Center provided the Department of Education with documentation of a PCB inspection. Knight Children’s Center did submit a copy of their local school committee approval.

CRITERION NUMBER	Legal Standard
<p align="center">2.3</p> <p>OCCS</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>

CRITERION NUMBER	
	Legal Standard
License (Not applicable to Day Schools)	
	Rating: Implemented RESPONSE REQUIRED: No

AREA 3: ADMINISTRATION -- MANUALS AND HANDBOOKS
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CRITERION NUMBER	
	Legal Standard
3.1 3.2 3.3 Policies and Procedures Manuals 28.09(11)(b) 18.05(9)(d)	<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;

CRITERION NUMBER	
	Legal Standard
	<p>c. written procedures for providing first aid are kept with the first aid supplies;</p> <p>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.);</p> <p>e. the procedures to be followed in the case of illness or emergency, including the transportation methods and notification of parents;</p> <p>f. the procedures to be followed in the case of fire or other emergency;</p> <p>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;</p> <p>h. the procedures to be followed in the case of illness or emergency if the parents cannot be reached;</p> <p>i. a plan to ensure that vision, hearing postural and other required screening are conducted in accordance with M.G.L. c. 71 s 57;</p> <p>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.</p> <p>k. narrative description of provision of medical, nursing, and infirmary care;</p> <p>l. a written policy describing the administration of medications, per DPH regulations;</p> <p>m. administration of anti-psychotic medications including, where appropriate, “Rogers Procedures”;</p> <p>n. notification to appropriate parties of student-specific health-related incidents, injury, hospitalization, death ;</p> <p>o. notification to appropriate parties of systemic health-related problems/issues;</p> <p>p. no smoking policy (see Assurance on this subject);</p> <p>q. plan for preventive health care of students;</p> <p>r. toileting procedures</p> <p>s. name and contact information for consultant physician and emergency contacts.</p> <p>3. Special Education Regulations and Reference Materials contain at least the following documents:</p> <p>a. Federal IDEA regulations: 34 CFR 300.300-.577</p> <p>b. Appendix A to the above federal regulations.</p> <p>c. State regulations: 603 CMR 28.00 and 603 CMR 18.00</p> <p>d. DOE IEP Process Guide and IEP Forms</p> <p>e. State restraint regulations (for day schools)</p> <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:

The Home for Little Wanderers Health Care manual is missing policies on elements h and i of the

criteria above.

AREA 4: DISCLOSURE OF INFORMATION
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CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">4.1</p> <p style="text-align: center;">Aspects of program, staff credentials, and student records</p> <p style="text-align: center;">28.09(5)(a)</p>	<p>The private school makes available to the Department of Education information on all aspects of the school’s program(s), the certification and/or credentials of its staff and the individual records of enrolled Massachusetts students.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">4.2</p> <p style="text-align: center;">Public Information and Postings</p> <p style="text-align: center;">28.09(6)(a,b, c,d,e)</p> <p style="text-align: center;">28.09(2)(b)(4)</p>	<p>The private school maintains on site and makes available for public view the following:</p> <ol style="list-style-type: none"> a. Documentation of the current approval or intake status issued by the Department of Education and/or licensing status issued by the Office of Child Care Services, if appropriate; b. first aid, medical and emergency procedures, location of nearest telephones within each building, and emergency telephone numbers (must be posted in each building); c. evacuation routes and procedures (must be posted in each room); d. program information including a statement of purpose, general description of educational program and an organizational chart showing the current administrative structure of the private school, including the lines of authority and staff assignments; e. a notice that use of tobacco products is not permitted on school property or at any school related function; f. current tuition rate for students; g. evidence of authority to operate the private school including documents that identify ownership and, as applicable, partnership agreements, the names of

CRITERION NUMBER	
	Legal Standard
	officers and board members, charters, articles of organization and by-laws.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
4.4 Advanced Notice of Program/ Facility Change 28.09(5)(c)	<p>Prior to any substantial change to the program or physical plant, the private school provides written notification to the Department to obtain approval. The program must also provide written notification to the Department of any sudden and/or unexpected changes that may impact the overall health or safety of students and/or the delivery of services required by IEP's. Examples of changes include, but are not limited to:</p> <ol style="list-style-type: none"> a. any change (either an increase or reduction) in services or staff including temporary staff shortages, that results in a change from the previously approved student/teacher (or student/childcare) ratios and/or a change in the program or service delivery to students per their Individualized Education Programs; b. building changes that affect the care of the students; c. major changes in the population to be served; d. any alteration of the service configuration of the program as last approved by the Department; and e. significant changes in policies or procedures.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
4.5 Immediate Notification 18.03(10) 18.05(7) 28.09(12)	<p>The private school makes immediate notification to the parent, the public school district special education administrator, and any State Agency involved in the student care or placement (by telephone and letter), and the Department of Education (by telephone and Form 2) of the following incidents:</p> <ol style="list-style-type: none"> a. the death of a student b. the hospitalization of a student (including out-patient emergency room visits) due to physical injury at school or previously unidentified illness, accident or disorder which occurs while the student is in the program c. any motor vehicle accident causing student injury d. the in-patient psychiatric hospitalization of a student due to an emergency mental health crisis which occurs while the student is in the program

CRITERION NUMBER	
	Legal Standard
	<ul style="list-style-type: none"> e. <u>any</u> student injury resulting from a restraint which requires medical attention f. whenever any student is administered medication in an emergency situation g. whenever any student runs away h. emergency termination of a student including circumstances in which the student presents a clear and present threat to the health and safety of him/herself or others i. a written termination summary explaining the reasons for the emergency termination is sent to the parent(s), the student (if over 14 years of age) local Administrator of Special Education, officials of the appropriate Human Service Agency and the Department of Education j. the filing of a 51-A report with DSS, or a complaint to the Disabled Persons Protection Commission against the school or a school staff member for abuse or neglect of a student against a school staff member for abuse or neglect of a student h. any action taken by a federal, state or local agency that might jeopardize the school's approval with DOE 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.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review and staff interviews indicated that The Home for Little Wanderers schools have not always made immediate notification to the Department of Education of required incidents or incidences of restraints lasting over twenty minutes.

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

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">5.1</p> <p>Student Admissions</p> <p style="text-align: center;">28.09(11)</p>	<p>The private school develops and implements written admissions criteria, policies and procedures that include the following:</p> <ul style="list-style-type: none"> 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; 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

CRITERION NUMBER	
	Legal Standard
	<p>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>
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
<p>5.2</p> <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>The private school works collaboratively with the placing public school district to 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>
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
<p>5.3</p> <p>Contents of Coordination</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>

CRITERION NUMBER	
<p align="center">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 300.349 and 300.400-401</p>	<p align="center">Legal Standard</p> <p>a. consideration of possible placement, admissions process;</p> <p>b. IEP development and implementation and roles in 3-year eligibility re-determinations;</p> <p>c. Contents and general arrangements for executing contracts with placing school districts;</p> <p>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;</p> <p>e. Written progress reports;</p> <p>f. Documentation regarding student-related developments, including matters involving students' behavioral plans, functional behavioral assessments, manifestation determinations, imposition of discipline, etc.</p> <p>g. Administration of tests;</p> <p>h. Preparations that are made for the student's return to a public school or other less restrictive setting;</p> <p>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</p> <p>j. school district monitoring of student progress.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

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

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CRITERION NUMBER	
	Legal Standard
<p data-bbox="269 380 310 407">5.5</p> <p data-bbox="212 447 367 506">Staff Coordinator</p> <p data-bbox="237 548 342 575">28.09(7)</p>	<p data-bbox="407 380 1357 438">A senior person is designated to communicate and work effectively with all public school districts that have placed students in the program.</p>
	<p data-bbox="407 625 686 653">Rating: Implemented</p> <p data-bbox="927 625 1341 653">RESPONSE REQUIRED: No</p>

AREA 6: EDUCATIONAL PROGRAM REQUIREMENTS -- STUDENT LEARNING TIME

CRITERION NUMBER	
	Legal Standard
<p data-bbox="269 1205 310 1232">6.1</p> <p data-bbox="207 1272 371 1367">Daily Instructional Hours</p> <p data-bbox="228 1409 350 1472">603 CMR 27.00</p>	<p data-bbox="407 1205 1256 1264">The private school provides an average annual minimum of the following instructional hours:</p> <ul style="list-style-type: none"> <li data-bbox="407 1272 873 1299">a. Elementary: 5 hours per school day <li data-bbox="407 1308 902 1335">b. Secondary: 5 ½ hours per school day
	<p data-bbox="407 1482 686 1509">Rating: Implemented</p> <p data-bbox="922 1482 1341 1509">RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p data-bbox="269 1778 310 1806">6.2</p> <p data-bbox="212 1845 367 1904">School Days per Year</p>	<p data-bbox="407 1778 1273 1837">The private special education program is conducted for the following days (exclusive of weekends, holidays, vacations):</p> <ul style="list-style-type: none"> <li data-bbox="407 1845 786 1873">a. 10 month program- 180 days <li data-bbox="407 1881 786 1908">b. 11 month program- 198 days <li data-bbox="407 1917 786 1944">c. 12 month program- 216 days

CRITERION NUMBER	
	Legal Standard
28.09(9)	
	Rating: Implemented RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
7.1 Curriculum Frameworks 28.09(9)(b)	<ol style="list-style-type: none"> 1. Private school personnel reflect a full understanding of the connection between the Massachusetts Curriculum Frameworks and the expectations of the state for student performance as well as the rights of students with disabilities to be full participants in the general curriculum. 2. The 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: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Interviews indicated that not all staff at Home for Little Wanderers schools have a full understanding and knowledge of the general curriculum and learning standards. Teacher's understanding of Massachusetts Curriculum Frameworks varies with level of teacher training. Clinical and counseling staff are not given training on the general curriculum.

CRITERION NUMBER	
	Legal Standard
7.2 Staff Training	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.

CRITERION NUMBER	
	Legal Standard
28.09(9)(b)	
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

See comment under 7.1. The Home for Little Wanderers should add training on Massachusetts Curriculum Frameworks and MCAS training to its annual training calendar.

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.
	Rating: Implemented RESPONSE REQUIRED: No

AREA 8: EDUCATIONAL PROGRAM REQUIREMENTS -- INDIVIDUALIZED EDUCATION PROGRAMS
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CRITERION NUMBER	
	Legal Standard
8.1 Implementation -- Educational Services 28.04 and 28.09(8)	The private school specifies how each of the following educational services are implemented for the described student population of the school: 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

CRITERION NUMBER	
	Legal Standard
34 CFR 300.24	
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.2 Implementa- tion – Related Services 28.04 and 28.09(8) 34 CFR 300.24	<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) 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: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.3	The private school provides examples (through a list or narrative) of the kinds of

CRITERION NUMBER	
	Legal Standard
Implementation – Supplementary Aids/Services 34 CFR 300.28	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 28.09	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.
	Rating: Implemented RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
8.6	The private school program implements all services on the students’ IEP.

CRITERION NUMBER	
	Legal Standard
IEP Implementation 28.09	
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Comment:

Interviews indicated that the Home for Little Wanderers schools notifies the LEA in a written service agreement of services on the IEP that it is not able to provide. Interviews indicate that at the Baird Center, students who require speech and language or occupational therapy services are not always provided these required services by the LEA.

CRITERION NUMBER	
	Legal Standard
8.7 IEP-Progress Reports 28.07(3) 20 U.S.C. Chapter 33, Section 1414(d)(1)(A) (viii) 34 CFR 300.347	The private school program sends copies, at least quarterly, of education progress 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. Copies of progress reports are maintained in student records, including documentation of persons or agencies receiving such reports.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Student record review indicated that progress reports are completed and sent out in a timely fashion. Progress reports at the Baird Center, Orchard School and Clifford School at Longview Farm did not always indicate whether the student’s progress would be sufficient to meet the goal by the end of the IEP period. The school did not include correspondence in the student file that would indicate the progress report is sent to the LEA.

Department of Education Findings:

Student record review and staff interviews indicated that the vision statements on the IEP do not reflect a 1-5 year plan for the students that is derived with student input.

CRITERION NUMBER	
	Legal Standard
<p>8.11</p> <p>IEP-Transition Services</p> <p>28.05(4)(c)</p>	<p>For students approaching graduation or the age of twenty-two, the private school’s participant on the IEP Team provides sufficient information to the Team to enable the Team to determine whether the student is likely to require continuing services from adult human service agencies.</p> <p>The private school works with the responsible school district to make any necessary referral to the Bureau of Transitional Planning in the Executive Office of Health and Human Services (at least two years prior to the student’s 22nd birthday) in accordance with the requirements of MGL c.71, §12A-§12C (known as Chapter 688).</p>
	<p>Rating: Not Applicable RESPONSE REQUIRED: No</p>

Department of Education Findings:

The Home for Little Wanderers schools do not serve students over age 16.

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

CRITERION NUMBER	
	Legal Standard
<p>9.1</p> <p>Policies and Procedures</p>	<p>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.</p>

CRITERION NUMBER	
	Legal Standard
18.05(5)	
	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: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
9.4 Restraints 18.05 (5)(h)	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. A residential educational program complies with the OCCS restraint requirements contained in 102 CMR 3.00 for all students enrolled in such program.

CRITERION NUMBER	
	Legal Standard
603 CMR 46.00 102 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: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Interviews indicated that parents are given verbal notification of restraints, but are not sent written notification of restraints within 36 hours of the restraint. Restraint policies do not indicate that the Department of Education will be notified of restraints over 20 minutes.

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: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that Baird Center’s written policy on suspension does not state that

required notifications of suspension are made immediately, followed by written notification within 24 hours. The policy also does not indicate that a day student will not be suspended and sent home if a responsible adult is not able to receive the student. The written policy made no mention of how the number of suspensions will be recorded and tracked for the number and duration of suspensions.

CRITERION NUMBER	
	Legal Standard
<p data-bbox="269 579 310 611">9.6</p> <p data-bbox="207 659 371 737">10+ Day Suspensions</p> <p data-bbox="207 785 375 1121">Joint responsibilities of the private school and the responsible school district</p> <p data-bbox="207 1171 371 1249">34 CFR 300.519-529</p>	<p data-bbox="407 579 1360 674">The private special education program implements the following procedures when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days:</p> <ul style="list-style-type: none"> <li data-bbox="407 680 1382 779">a. A request is made of the student's responsible school district to convene an IEP Team meeting, which includes representation from the private school, prior to a suspension that constitutes a change in placement of a student with disabilities; <li data-bbox="407 785 1349 911">b. The private school participates in the Team meeting: <ul style="list-style-type: none"> <li data-bbox="456 816 1344 879">(1) to develop or review a functional behavioral assessment of the student's behavior and to develop or modify a behavior intervention plan; <li data-bbox="456 886 1198 911">(2) to identify appropriate alternative educational setting(s); and <li data-bbox="407 917 1382 1079">c. to conduct a manifestation determination (i.e.- to determine the relationship between the disability and the behavior). [To do this, the Team asks questions including: Is the IEP appropriate? Is the placement appropriate? If there was a behavior plan, was it implemented? Does the student understand the impact and consequences of his/her behavior? Can the student control his/her behavior?]. <li data-bbox="407 1085 1349 1247">d. If the Team determines that the behavior is <u>NOT</u> a manifestation of the disability, the school may suspend or terminate the student consistent with policies applied to any other student in the program. The responsible school district must, however, offer an appropriate education program to the student with disabilities that may be in some other setting. <li data-bbox="407 1253 1377 1379">e. If the TEAM determines that the behavior <u>IS</u> a manifestation of the disability, the placing district, in coordination with the private school, takes steps (with the consent of the parent) to modify the IEP, the behavior intervention plan, and/or the placement.
	<p data-bbox="407 1436 688 1467">Rating: Implemented</p> <p data-bbox="919 1436 1344 1467" style="text-align: right;">RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p data-bbox="269 1738 310 1770">9.7</p> <p data-bbox="207 1808 371 1839">Terminations</p> <p data-bbox="237 1877 342 1908">18.05(7)</p>	<p data-bbox="407 1738 1393 1839">The private school program does not terminate the enrollment of any student, even in emergency circumstances, until the enrolling public school district is informed and assumes responsibility for the student.</p> <p data-bbox="407 1877 1333 1936">The program has developed a written termination policy that includes, but is not limited to, the following:</p>

CRITERION NUMBER	
	Legal Standard
28.09(12)(b)	<ul style="list-style-type: none"> a. At the request of the public school district, the program delays termination of the student for up to two (2) calendar weeks to allow the public school district the opportunity to convene an emergency Team meeting or to conduct other appropriate planning discussions prior to the student's termination. b. With mutual agreement between the private special education program and the placing public school district, termination of enrollment may be delayed for longer than two calendar weeks. 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. 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.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that Home for Little Wanderers Schools have a policy on terminations. However, their policy does not state that Home for Little Wanderers Schools will delay termination of enrollment for longer than two calendar weeks with mutual agreement between the private special education program and the placing public school district.

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

CRITERION NUMBER	
	Legal Standard
10.1	Unless otherwise approved by the Department of Education, the private special education program ensures that instructional groupings do not exceed:

CRITERION NUMBER	
	Legal Standard
Student: Teacher Ratios 28.06(6)(d)& (g) 28.09(7)(e)	a. 8 students to one certified teacher without an aide, or b. 12 students to one certified teacher with an aide.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Classroom observation, review of student records and staff interviews indicated that students placed at the Baird Center require more intensive staff: student ratio within each classroom because of the wide range of educational capabilities of students in each classroom.

CRITERION NUMBER	
	Legal Standard
10.2 Age Range 28.06(6)(f)	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). (NOTE: No waiver of this requirement can be approved by the Department of Education.)
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Compliance with this criterion could not be verified at Baird because Baird did not provide the Department of Education with the birth dates of students in each classroom.

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.

CRITERION NUMBER	
	Legal Standard
28.09(7)(e) 28.06(7)	
	Rating: Not Applicable RESPONSE REQUIRED: No

Department of Education Findings:

The Home for Little Wanderers schools do not serve students aged 3-4.

CRITERION NUMBER	
	Legal Standard
10.4 Student: Child Care Ratios 28.09(7) 18.01(2)	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.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Interviews indicated that one unit at Knight Children’s Center has a staff: student ratio of 1:10 for overnight.

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 Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

See comment under criterion 10.4 The Department of Education has not received a justification for the 10:1 staff on one unit(Jag) at Knight Children’s Center.

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

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">11.1</p> <p>Personnel Policies</p> <p>28.09(7) 28.09(11)(f) 18.05(11)</p>	<p>The private special education program has developed written personnel policies and procedures that describe:</p> <ol 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.)
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">11.2</p> <p>Administrative Responsibility</p> <p>18.05(11)(a)</p>	<p>The private special education program designates one person who has administrative responsibility over the operation of the school. Where a school with more than 40 professional certified staff has one (or more) assistant administrator(s), the Department of Education has approved such positions.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p data-bbox="261 380 318 407">11.3</p> <p data-bbox="212 447 367 611">Educational Administrator Qualifications</p> <p data-bbox="220 646 358 674">28.09(7)(a)</p> <p data-bbox="228 714 350 810">603 CMR 44.00 and 44.04</p>	<p data-bbox="407 380 1396 506">The private school designates an educational administrator to supervise the provision of special education in the school and to ensure that the services specified in each student’s IEP are delivered. The educational administrator either has certification as a special education administrator or all of the following:</p> <ul style="list-style-type: none"> <li data-bbox="407 512 854 539">a. certification as a special educator; <li data-bbox="407 546 1321 573">b. a minimum of a master's degree in special education or a related field; and <li data-bbox="407 579 1065 606">c. a minimum of one year of administrative experience. <p data-bbox="407 646 1377 705">The educational administrator has been re-certified pursuant to the requirements of 603 CMR 44.00.</p> <p data-bbox="407 714 1256 772">The educational administrator has obtained supervisor approval of his/her Professional Development Plan per 603 CMR 44.04.</p>
	<p data-bbox="407 821 686 848">Rating: Implemented</p> <p data-bbox="919 821 1341 848" style="text-align: right;">RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p data-bbox="261 1119 318 1146">11.4</p> <p data-bbox="204 1186 375 1381">Special Education Teachers and Regular Education Teachers</p> <p data-bbox="204 1421 375 1480">28.09(7)(b)(c) 18.05(11)(f)</p>	<p data-bbox="407 1119 1393 1245">The private special education program ensures that all teaching staff have teaching certification appropriate to meet the needs of the population being served pursuant to the requirements of 603 CMR 7.00 and, additionally, adhere to the following requirements:</p> <ul style="list-style-type: none"> <li data-bbox="407 1260 1393 1386">a. All teaching staff are re-certified pursuant to the requirements of Massachusetts Board of Education regulations and are subject to the same requirements as teachers in Massachusetts public schools and obtain supervisor approval of Professional Development Plans pursuant to 603 CMR 44.04. <li data-bbox="407 1400 1393 1526">b. At least half of the teaching staff is certified in special education areas 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. <li data-bbox="407 1541 1393 1638">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. <li data-bbox="407 1652 1393 1711">d. To the extent that teaching staff is providing special education services, such services are provided, designed, or supervised by a special educator.
	<p data-bbox="407 1772 800 1799">Rating: Partially Implemented</p> <p data-bbox="919 1772 1352 1799" style="text-align: right;">RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation review and staff interviews indicated that at Baird all appropriate paperwork

necessary to complete the waiver process has not been submitted. Administrators at Baird apply for waivers for teachers who are not certified in special education, however there was no documentation that teachers seeking waivers have applied for certification. If teachers do not apply for certification, waivers will not be granted. Baird does not have a method to monitor that teachers have applied for certification, take the teacher test and, if on an approved waiver, are taking courses as required toward that waiver.

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

CRITERION NUMBER	
	Legal Standard
11.6 Master Staff Roster 28.09(7)	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).
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.9 Organizational Structure	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.

CRITERION NUMBER	
	Legal Standard
28.09(7) 28.07(c)	
	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)	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. 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.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review and observation indicated that all Home for Little Wanderers schools have developed a master schedule of evening activities that is posted at each residence. However, documentation submitted by Baird, Knight Children’s Center and Orchard Schools only described staffing patterns and did not include a plan for individual and group recreation programs appropriate to the age, interests and needs of students. Observation at the time of evening on-site visits indicated that Longview School has a commendable method of developing a weekly pre-planned and detailed schedule of specific activities with both staff and student input. Evening activities at Knight

Children’s Center were structured and students understood the activity schedule, however, there was no evidence that the activity schedule was pre-planned.

At Orchard School, students were observed to be simply “hanging out.” Dining room procedures are not planful. Some students were made to wait in the dining room while others were given food one at a time. When scheduled therapy sessions are cancelled, there are no alternate activities scheduled, and therapies are not re-scheduled. Students and staff reported that no activities are planned for students after school or in the evenings. If plans are provided during these times, the school does not take steps to ensure that such plans are implemented.

CRITERION NUMBER	
	Legal Standard
11.12 Plan for Staff Coverage 18.03(1)(b)4	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.
	Rating: Implemented RESPONSE REQUIRED: No

AREA 12: EDUCATIONAL STAFFING REQUIREMENTS -- STAFF TRAINING

CRITERION NUMBER	
	Legal Standard
12.1 Staff Orientation Training 18.05(11)(g)	<p>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>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>New staff are not be assigned direct care duties with students until they have</p>

CRITERION NUMBER	
	Legal Standard
	participated in all mandated training through their orientation program.
	Rating: Commendable RESPONSE REQUIRED: No

Department of Education Findings:

The Home for Little Wanderers provides all staff with an eight-day comprehensive and extensive staff orientation process for newly hired staff.

CRITERION NUMBER	
	Legal Standard
12.2 Annual In-Service Training Plan and Calendar	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.
28.09(7)(f)	The following topics are required in-service training topics and are offered annually to all staff providing direct care services to students:
18.05(11)(h)	<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.

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

Department of Education Findings:

Documentation review and staff interviews indicated that not all staff are receiving training on the Home for Little Wanderer’s policies and procedures on transportation, the Massachusetts Curriculum Frameworks and MCAS.

CRITERION NUMBER	
	Legal Standard
12.2 (a) Behavior Management and Restraint Training 28.09(11) 18.05(5)	<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; 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

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: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that the Home For Little Wanderers policy on reporting suspected abuse or neglect states, “Prior to filing a report against The Home, the report shall be reviewed by the Vice President for Programs.” Although a program may wish to encourage staff members to consult with the administration before filing a 51A, staff members cannot be required to seek the approval of administrators before contacting the Department of Social Services with a concern of suspected abuse or neglect.

CRITERION NUMBER	
	Legal Standard
12.2 (c) Emergency First Aid Training and CPR Certification 18.05(9)(e)	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.
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Documentation review and staff interviews indicated that all staff members are trained in CPR and first aid.

CRITERION NUMBER	
	Legal Standard
12.2 (d)	Training by a physician or registered nurse is given to all staff providing care and

CRITERION NUMBER	
	Legal Standard
Medication Training 18.05(9)(f)(3)(c)	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 18.05(10)	<p>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.</p> <p>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) to ensure that all students are able to leave the building safely. In addition, the program shall:</p> <ol style="list-style-type: none"> a. help all students to understand the nature of the drills b. make special provisions for the evacuation of any mobility-impaired student in the facility c. keep a written log of each evacuation drill, detailing such things as the date, time elapsed, students and staff who participated and any witnesses.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review and staff interviews indicated that staff at all Home for Little Wanderers schools are trained in evacuation procedures. However, only Baird Center submitted documentation that it annually conducts at least two evacuation drills per shift.

CRITERION NUMBER	
	Legal Standard
12.2 (g) Interns and Volunteers Training 18.05 (11)(I)	If applicable, the private school’s training plan includes provisions for orientation, training and supervision of interns, volunteers and others who work at the program.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
12.2(h) Child Care Staff Development and Training 18.03(3)	The private special education program develops and implements with staff input a detailed written plan for staff development and in-service training of all childcare workers.
	Rating: Implemented RESPONSE REQUIRED: No

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.

CRITERION NUMBER	
	Legal Standard
	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

Department of Education Findings:

Interviews indicated that at Baird, when students are referred to Baird who require speech and language, OT and/or specific vocational needs or a lower student: teacher ratio, Baird notifies LEAs in their service contract that Baird does not provide these services. The LEA then has the responsibility to provide these related services; however, students are not receiving these services in all cases.

CRITERION NUMBER	
	Legal Standard
13.3 Physical Facility/ Architectural Barriers 18.04(8)	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. 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

CRITERION NUMBER	
	Legal Standard
	all programs and appropriate buildings accessible.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Observation indicated that the residence at Orchard school is not accessible to students with limited mobility. There is no ramp into the building. All the bedrooms are on the second floor and there is no elevator to the second floor or a plan to convert a room on the first floor to a bedroom should a child with mobility issues require accessibility. In addition, there is no handicapped accessible bathroom in the building.

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">13.4</p> <p>Kitchen, Dining, Bathing/ Toilet, and Living Areas</p> <p>18.04(2, 3, 4, 5)</p>	<p>The private special education program ensures that all kitchen, dining, bathing/toilet and living areas are of an adequate type, size and design appropriate to the ages and needs of the students. The program shall also:</p> <ol style="list-style-type: none"> a. Maintain areas which are clean, well ventilated and free from hazards b. Provide students with equipment, supplies and materials (e.g., kitchen equipment, dining utensils, toilets, sinks, individual furniture and storage space) which are clean, safe and appropriate to the ages and needs of the students c. Design all living areas to simulate the functional arrangements of a home and to encourage a personalized atmosphere for small groups of students, unless the school can justify that another arrangement is necessary to serve the particular needs of the students enrolled in the school. d. Post a list of student food allergies in all appropriate areas of the residence.
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Observation and staff interviews indicate that The Home for Little Wanderers meets all elements of this criterion. However, the teaching and child care staff at Baird are doing a lot of routine maintenance and cleaning which takes away from their planning time and diverts their attention from their duties with the students.

CRITERION NUMBER	
	Legal Standard
13.5	Each room or area that is utilized for the instruction of students is adequate with respect to the number of students, size and age of students and students' specific

CRITERION NUMBER	
	Legal Standard
Classroom Space 18.04(6)(a)	educational needs, physical capabilities and educational/vocational activities.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
13.6 Library/ Resource Room 18.04(6)(b)	In addition to the regular instructional area, the school has a library or resource room (or comparable instructional resource area approved by the Department of Education) that contains a variety of materials appropriate to the age and abilities of the students enrolled.
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Comment:

Observations indicated that library resources at The Baird Center, Longview Farms and Knight Children's Center limited. At The Baird Center, for example, the library consists of three bookshelves in an office. At Longview, the library is located within a classroom. At Knight Children's Center, the library is locked and rarely used.

CRITERION NUMBER	
	Legal Standard
13.7 Indoor Space 18.04(7)(a)	The school provides a minimum of thirty-five (35) square feet of activity space per student exclusive of classrooms, hallways, lockers, toilet rooms, isolation rooms, kitchen, closets, offices or areas regularly used for other purposes. Additionally, the program: a. ensures that all areas, including but not limited to, floors, ceilings and walls, are clean, well maintained and free from safety hazards; b. protects all steam and hot water pipes by permanent screen guards, insulation, or any other suitable device which prevents students from coming in contact with them; c. maintains room temperatures at not less than 68 degrees Fahrenheit at zero Fahrenheit outside and at not more than the outside temperature when the

CRITERION NUMBER	
	Legal Standard
	outside temperature is above 80 degrees Fahrenheit; and d. designates space separate from classroom areas for administrative duties and staff or parent conferences.
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:
See comment under criterion 13.4

CRITERION NUMBER	
	Legal Standard
13.8 Outdoor Space 18.04(7)(b)	Outdoor play areas are accessible to direct sunlight and free from hazards and/or harsh or abrasive materials. If adjacent to a highway or other dangerous area, the outdoor play areas are fenced with a non-climbable barrier at least five feet high. The school shall maintain or have access to an outdoor play area of at least seventy-five square feet per student using it at any one time.
	Rating: Implemented RESPONSE REQUIRED: No

AREA 14: REQUIREMENTS FOR DAILY CARE

CRITERION NUMBER	
	Legal Standard
14.1 Clothing, Grooming and Hygiene 18.03(5)	The school makes provisions with parents or, where appropriate, state agencies to assure that all students are provided with clean, appropriate and seasonal clothing as well as personal grooming and hygiene articles and materials necessary to meet his/her individual needs.
	Rating: Implemented RESPONSE REQUIRED: No

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>
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews indicated that the Home for Little Wanderers schools involve parents through open houses, family therapy, quarterly review meetings, etc. However documentation review indicated that the schools have no written plan for involving parents. Interviews and documentation review indicated that the Home for Little Wanderers schools have begun planning for Parents' Advisory Groups, however there was no evidence that Parent Advisory Group meetings have been scheduled at Orchard School.

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>
	Rating: Commendable RESPONSE REQUIRED: No

Department of Education Findings:

Documentation review indicated that Knight Children Center, Orchard School and Clifford School at Longview Farms conduct onsite orientation and tours for parents and have developed a Parent Handbook that provides parents with extensive information on its policies and procedures for students and staff. The Baird Parent Pamphlet, however, makes reference to Boston Children's Services and needs to be updated.

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

Department of Education Findings:

Documentation review indicated that Clifford School at Longview Farm and Baird School have developed a form regarding changes in a students' legal status, however the Department of Education was not provided with written procedures on how this information is disseminated to appropriate personnel.

CRITERION NUMBER	
	Legal Standard
15.4 Parent Consent 28.07(1)(b)	<p>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:</p> <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 Student Involvement	<p>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.</p>

CRITERION NUMBER	
	Legal Standard
34 CFR 300.344	
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
15.6 Consent at Age of Majority 28.07(5)	<p>One year prior to the student’s reaching age eighteen, the program works collaboratively with the responsible school district to ensure consent is obtained from the student to continue the special education program upon turning age eighteen, or to ensure that another mechanism is in place to obtain consent, i.e.:</p> <ul style="list-style-type: none"> a. the parent or other legally eligible party has petitioned and been appointed guardian by a court of competent jurisdiction; b. the student chooses to share decision-making with his or her parent; c. the student chooses to delegate continued decision-making to his or her parent or other willing adult. <p>(See also Criterion 15.3.)</p>
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

The Home for Little Wanderers schools did not submit information on this criterion to the Department of Education. Documentation review indicated that at Orchard School, there are students for whom this criterion should be implemented when the student reaches 17 years of age. Compliance with this criterion could not be verified at Baird because Baird did not provide the Department of Education information on student birth dates.

CRITERION NUMBER	
	Legal Standard
15.7 Registering Complaints 18.05(1)(b)16	<p>The private special education program has developed and made available to parents and students written procedures that may be used to register complaints regarding the student’s education and care at the facility.</p>

	Rating: Implemented	RESPONSE REQUIRED:	No
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AREA 16: HEALTH AND MEDICAL SERVICES

CRITERION NUMBER	
	Legal Standard
16.1 Health Care Policy and Procedure Manual 18.05(9)(c) 18.05(9)(d)	<p>The school has a comprehensive, written health care policies and procedures manual that clearly describes provisions made for medical, nursing and infirmary care of students. This manual is approved by the health care consultant, includes all applicable policies and procedures, and is made available to staff.</p>
	Rating: Implemented RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
16.3 Nursing	<p>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.)</p>

CRITERION NUMBER	
	Legal Standard
18.05(9)(b)	
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review and interviews indicated that Orchard currently has a 40-hour a week vacancy for nursing. Interim nursing services are provided three days per week through Americare and the Director of Health Services for the agency is available for coverage and can be reached by pager. Interviews indicated that at Baird the increased medical and health care needs of students currently enrolled requires broader nursing coverage to include evening and weekend coverage.

CRITERION NUMBER	
	Legal Standard
16.4 Emergency First Aid 18.05(9)(e)	<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.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
16.5	The school has developed and implements written policies and procedures regarding the administration of medication including, but not limited to, the following:

CRITERION NUMBER	
	Legal Standard
Administra- tion of Medication 18.05(9)(f)	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 labeled by the physician or pharmacist. Provisions must be made for refrigeration of medications, when necessary. g. the school shall have a written policy regarding the amount of medication to be kept on the premises at any one time for each student receiving medication; h. a review of medications administered to a student shall be incorporated into all progress reviews conducted for the student.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review indicated that the Home for Little Wanderers Schools has a policy that prescription medication can be administered to a student on a “verbal order” that is countersigned by a licensed physician within three days. This policy is not in line with item (b) of this criterion. Home for Little Wanderers policy does not state that a review of medication administered to a student is incorporated into all progress reviews conducted for the student as is required in item (h) above of this criterion.

CRITERION NUMBER	
	Legal Standard
16.6 Administra- tion of Antipsychotic Medication	The school does not administer or arrange for the administration of antipsychotic medication (drugs used in treating psychoses and alleviating psychotic states) except under the following circumstances: a. antipsychotic medication shall be prescribed by a licensed physician for the diagnosis, treatment and care of the child and only after review of the student's medical record and actual observation of the student; b. the prescribing physician shall submit a written report to the school detailing the

CRITERION NUMBER	
	Legal Standard
18.05(9)(f)(9)	<p>necessity for the medication, staff monitoring requirements, potential side effects that may or may not require medical attention and the next scheduled clinical meeting or series of meetings with the student;</p> <p>c. no antipsychotic prescription shall be administered for a period longer than is medically necessary and students on antipsychotic medication must be carefully monitored by a physician;</p> <p>e. staff providing care to a student receiving antipsychotic medication shall be instructed regarding the nature of the medication, potential side effects that may or may not require medical attention and required monitoring or special precautions, if any;</p> <p>f. except in an emergency, as defined in 18.05 (9)(g), the school shall neither administer nor arrange for the prescription and administration of antipsychotic medication unless informed written consent is obtained. If a student is in the custody of his/her parent(s), parental consent (in writing or in a witnessed conversation) is required. Parental consent may be revoked at any time unless subject to any court order. If the parent does not consent or is not available to give consent, the referral source shall be notified and judicial approval shall be sought. If a student is in the custody of a person other than the parent, a placement agency or an out-of-state public or private agency, the referral source shall be notified and judicial approval shall be sought.</p> <p>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. The treating physician must determine that medication is necessary to prevent the immediate substantial and irreversible deterioration of a serious mental illness. If the treating physician determines that medication should continue, informed consent or judicial approval must be obtained as required by 18.05(9)(e).</p> <p>h. the school shall inform a student twelve 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 shall specify and follow procedures if the student refuses to consent to administration of the medication.</p>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation review indicated that the Home for Little Wanderers policy on administering anti-psychotic medications does not include the following required elements of this criterion:

(a) a licensed physician will not prescribe anti-psychotic medication without actual observation of a student; (b) the prescribing physician will submit a written report to the school detailing the necessity for the medication; (c) no anti-psychotic prescription shall be administered for a period longer than is medically necessary; (e) staff providing care to a student receiving anti-psychotic medication shall be instructed regarding the nature of the medication, potential side effects and required monitoring or special precautions; (f) the school will not administer or arrange for the prescription and administration of anti-psychotic medication except in an emergency or with parental consent; (g) in an emergency situation, anti-psychotic medication may be administered.

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">16.7</p> <p>Preventive Health Care</p> <p>18.05(9)(f)(9)(h)</p>	<p>The school has developed and implements a written plan for the preventive health care of students including, but not limited to:</p> <ul style="list-style-type: none"> a. provision for each student to receive an annual comprehensive medical and dental examination; b. vision, hearing, postural and other required screening are conducted in accordance with M.G.L. c.71 s.57; c. ensuring that all students have necessary immunizations as required by the Department of Public Health; d. a student or staff member who has a reported communicable disease shall be authorized by a physician to continue to be present within the school; the school shall notify all parents and referring agencies of the reported communicable disease within the school; e. provision of a locked, secure cabinet to keep all toxic substances, medications, sharp objects and matches out of the 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.); f. provision of family planning information, subject to any applicable state or federal legislation; and g. protecting a student from exposure to foods, chemicals, or other materials to which they are allergic.
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation review indicated that The Home for Little Wanderers policies on provision of family planning information and protecting students from allergies are contained in the Health Manual, however these sections of the Health Manual were not provided to the Department of Education. Staff interviews indicated that Baird School has not provided annual hearing and postural screenings for all students. Documentation does not indicate that day students at Clifford School at Longview Farm receive vision, hearing or postural screenings.

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">16.8</p> <p>Receipt of Medical Treatment-Religious Beliefs</p> <p>18.05(9)(k)</p>	<p>In the absence of an emergency or epidemic of disease declared by the Massachusetts Department of Public Health, the school does not require any student to receive medical treatment when the parents object thereto on the ground that such treatment conflicts with a religious belief.</p>

CRITERION NUMBER	
	Legal Standard
	Rating: Implemented RESPONSE REQUIRED: No

AREA 17: TRANSPORTATION SAFETY

CRITERION NUMBER	
	Legal Standard
17.1 Transportation Safety	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.
28.09(11)(b)	In the event of a motor vehicle accident, parents, school districts, human service agencies, and the Department of Education are notified immediately. 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.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Documentation review and interviews indicated that staff persons at all Home for Little Wanderers school who drive students are provided with written information on providing transportation to students, however not all staff who provide transportation to students have received formalized annual in-service training on transportation safety that includes but is not limited to motor vehicle safety, reporting accidents, etc.

AREA 18: STUDENT RECORDS

CRITERION NUMBER	
	Legal Standard

CRITERION NUMBER	
	Legal Standard
18.1 Student Records 28.09(10)	The private school keeps current and complete files for each publicly funded enrolled Massachusetts student and maintains such files consistent with the Massachusetts Student Record Regulations (603 CMR 23.00) and MGL c. 71, s. 34H.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Student record review indicated that not all student files at each Home for Little Wanderers school contained all required documents/element; e.g. correspondence from the LEA regarding team meetings, not all elements of the IEP were filled out, pages from the IEP were missing, required LEA private school contracts, LEA monitoring plans, etc.

CRITERION NUMBER	
	Legal Standard
18.2 Student Records 28.09(10) MGL c.71, s. 34H 603 CMR 23.00 Family Educational Rights and Privacy Act (FERPA)	<p>Student records are legibly dated and signed by persons making entries. Individual access logs are maintained for each record. All records contain:</p> <p>a. log of access consistent with requirements of the Massachusetts Student Record Regulations. 18.05(11)(a)</p> <p>b. face sheets with the following information:</p> <ul style="list-style-type: none"> • Name • Date of birth • Recent picture • Date of admission to private school • Name of educational case manager • Location of residential service within facility (if applicable), and name of residential case manager or supervisor • Date initially eligible for special education (if known) • Date of most recent special education evaluation(s) • Date of next expected 3-year reevaluation • Starting and expiration dates of current (or most recent) IEP • Primary language of student • Legal status of student • If under 18: in custody of both parents, one parent [specify], legal guardian [specify], other [specify] • If 18 or over: makes own decisions; under legal guardianship [specify]; has shared role with parent in education decisions [specify] • Other state agency/ies involved with student: • Parent/guardian contact information: names, addresses, H & W telephone numbers, e-mails • Primary language of parents/guardian

CRITERION NUMBER	
	Legal Standard
	<ul style="list-style-type: none"> • Contact information of persons other than parents to be contacted in an emergency (names, addresses, telephone numbers) • 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: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Student record review indicated that there was no log of access in student records at Knight Children Center. The log of access at the Baird Center, Orchard School and Clifford School at Longview Farm had a log of access that did not contain required elements, only "date signed out, time signed out, date/time returned, staff initials. The student face sheet at each Home for Little Wanderers school did not contain all required elements. The onsite team recommends that the agency develops one face sheet that is used at all schools that contains all elements listed under "b" of this criterion above.

PRIVATE SCHOOL PROGRAM REVIEW REPORT 2002.doc

File Name: Home for Little Wanderers 2002

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