



White Oak School

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

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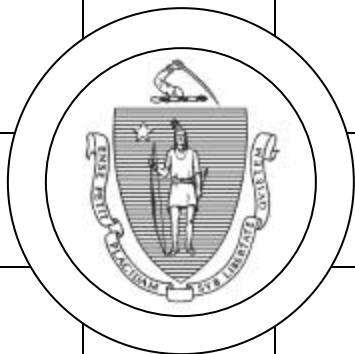
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**MASSACHUSETTS DEPARTMENT OF EDUCATION
PRIVATE SPECIAL EDUCATION SCHOOL PROGRAM REVIEW**

White Oak School

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MASSACHUSETTS DEPARTMENT OF EDUCATION
APPROVED PRIVATE SCHOOL PROGRAM REVIEW REPORT

OVERVIEW OF REVIEW PROCEDURES

INTRODUCTION

The Massachusetts Department of Education is required under MGL c. 71B, §10 to review special education programs in approved private special education schools that serve publicly funded students under the provisions of Board of Education Regulations 603 CMR 28.00 and 18.00. Each private school submits an application for approval by the Department of Education and periodically updates information included in the application on how special education services are provided. Each year, the Department's Program Quality Assurance Services unit conducts onsite visits to selected approved private schools to verify the implementation of their applications. The selected schools for 2001-2002 were notified in September 2001 of scheduled visits and were encouraged to assess themselves before the arrival of the Department's visiting team.

Private School Program Review Elements

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

Scope: Starting in FY 2001, all approved private schools in the Commonwealth will be monitored through the Department's Private School Program Review system on a six-year cycle with an additional mid-cycle followup visit. This six-year monitoring and followup cycle is coordinated with the Department's Approved Private School Application Renewal procedures.

Content: The Program Review criteria encompass key elements drawn from 603 CMR 18.00 and 28.00 and the private school's application for approval. The elements selected for the 2001-2002 reviews also include those required by the federal Office for Special Education Programs (OSEP) and revised requirements of the Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 *et seq.* (IDEA-97) as described in the Department's Special Education Advisories issued during the 1997-2001 school years. Selected Program Review compliance criteria are aligned with the requirements and goals of the Massachusetts Education Reform Act of 1993, being intended to promote high standards and achievement for all students.

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

- Interviews of administrative, clinical, instructional and support staff across all grade levels.
- Interviews of Parent Group representatives.
- Other interviews as requested by personnel from state and local agencies and members of the general public.

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

Response: A detailed report of findings describes determinations about the implementation status of each requirement (criterion) reviewed. Included in the findings are commendations for those criteria that have been Implemented in an exceptional manner. Where criteria are found not to be fully Implemented, the private school must propose corrective action to bring those areas into compliance with the controlling statutes or regulations. Private schools are encouraged to incorporate the corrective action into their program improvement planning, as well as their professional and paraprofessional staff development plans.

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

REPORT INTRODUCTION

A two-member Massachusetts Department of Education team visited White Oak School 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 White Oak School. These features are as follows:

The onsite team was impressed with the devotion of teachers to the goal of teaching each student that they can succeed in educational pursuits. Staff are persistent in uncovering and meeting student needs.

White Oak School implements an educational model that includes a daily one-hour individual tutorial for each student. This one to one tutorial is primarily used to improve the students’ reading skills but can be used to meet any need of the student. There is a blend of remediation and new content instruction within the curriculum.

Every classroom in the school has an individual computer for each student in that class. The computers are linked to enable students to access their personal folder containing all of their written work from any computer at the school.

The school utilizes a mentoring program for every new teacher. Upon hire, each new teacher is assigned a senior teacher as a mentor who is responsible for assisting the new teacher in all aspects of the profession.

Supervision and support by administrators to teaching staff is commendable. Each teacher is formally observed on a bi-weekly basis and receives a written review and supervisory input after each observation. The supervisory review is used to modify and improve each student’s classroom experience.

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 five administrative staff.
- Interviews of 18 teaching and educational support services staff.
- Interviews of four representatives of state and local agencies responsible for placement of students in the school.
- Student record review: the Department selected a sample of fifteen Massachusetts student records. 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.
- 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: Implemented RESPONSE REQUIRED: No</p>

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>

CRITERION NUMBER	
	Legal Standard
2.3 OCCS License (Not applicable to Day Schools)	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.
	Rating: Not Applicable RESPONSE REQUIRED: No

AREA 3: ADMINISTRATION -- MANUALS AND HANDBOOKS

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:

CRITERION NUMBER	
	Legal Standard
	<ul style="list-style-type: none"> a. Training of all direct service staff by a certified instructor for CPR certification and in basic and emergency first aid; b. secure storage of adequate first aid supplies, including but not limited to bandages, body substance isolation gloves, gauze, adhesive tape, hydrogen peroxide or other cleaning solutions, and ipecac. First aid supplies are easily accessible in each major activities area; c. written procedures for providing first aid are kept with the first aid supplies; d. telephone numbers for the fire department, police station, poison prevention center, hospital emergency room and ambulance service serving the school in both living quarters and educational facilities (These should also be posted conspicuously throughout the buildings.); e. the procedures to be followed in the case of illness or emergency, including the transportation methods and notification of parents; f. the procedures to be followed in the case of fire or other emergency; g. a procedure for informing parents of any first aid administered to their child or of any injury or illness that required care other than first aid; h. the procedures to be followed in the case of illness or emergency if the parents cannot be reached; i. a plan to ensure that vision, hearing postural and other required screening are conducted in accordance with M.G.L. c. 71 s 57; j. a written policy developed by the school for protecting students from exposure to foods, chemicals and other material to which they may be allergic. k. narrative description of provision of medical, nursing, and infirmary care; l. a written policy describing the administration of medications, per DPH regulations; m. administration of anti-psychotic medications including, where appropriate, “Rogers Procedures”; n. notification to appropriate parties of student-specific health-related incidents, injury, hospitalization, death ; o. notification to appropriate parties of systemic health-related problems/issues; p. no smoking policy (see Assurance on this subject); q. plan for preventive health care of students; r. toileting procedures s. name and contact information for consultant physician and emergency contacts. <p>3. Special Education Regulations and Reference Materials contain at least the following documents:</p> <ul style="list-style-type: none"> a. Federal IDEA regulations: 34 CFR 300.300-.577 b. Appendix A to the above federal regulations. c. State regulations: 603 CMR 28.00 and 603 CMR 18.00 d. DOE IEP Process Guide and IEP Forms e. State restraint regulations (for day schools) <p>*Private schools shall provide written notice to parents of enrolled students that copies of policies and procedures are available upon request.</p>

CRITERION NUMBER	
	Legal Standard
	Rating: Implemented RESPONSE REQUIRED: No

AREA 4: DISCLOSURE OF INFORMATION
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CRITERION NUMBER	
	Legal Standard
4.1 Aspects of program, staff credentials, and student records 28.09(5)(a)	<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>
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
4.2 Public Information and Postings 28.09(6)(a,b, c,d,e) 28.09(2)(b)(4)	<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

CRITERION NUMBER	
	Legal Standard
	<p>and staff assignments;</p> <p>e. a notice that use of tobacco products is not permitted on school property or at any school related function;</p> <p>f. current tuition rate for students;</p> <p>g. evidence of authority to operate the private school including documents that identify ownership and, as applicable, partnership agreements, the names of officers and board members, charters, articles of organization and by-laws.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p>4.4 Advanced Notice of Program/Facility Change 28.09(5)(c)</p>	<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> <p>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;</p> <p>b. building changes that affect the care of the students;</p> <p>c. major changes in the population to be served;</p> <p>d. any alteration of the service configuration of the program as last approved by the Department; and</p> <p>e. significant changes in policies or procedures.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p>4.5 Immediate Notification 18.03(10) 18.05(7)</p>	<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> <p>a. the death of a student</p> <p>b. the hospitalization of a student (including out-patient emergency room visits) due to physical injury at school or previously unidentified illness, accident or</p>

CRITERION NUMBER	
	Legal Standard
28.09(12)	<p>disorder which occurs while the student is in the program</p> <ul style="list-style-type: none"> 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 e. any 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.
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

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

CRITERION NUMBER	
	Legal Standard
<p>5.1</p> <p>Student Admissions</p> <p>28.09(11)</p>	<p>The private school develops and implements written admissions criteria, policies and procedures that include the following:</p> <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

CRITERION NUMBER	
	Legal Standard
	<p>emergency placements, the school shall make provisions for a complete examination of the student within thirty (30) days of admission;</p> <p>c. a complete and thorough description of the interview process; and</p> <p>d. consent forms.</p>
	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</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	
	Legal Standard
<p>Coordination and Collaboration with Public School Districts</p> <p>28.06(2-3) 28.07(5) 28.09(9)(c) &(d) 28.09(2)(b)(7)</p> <p>34 CFR 300.349 and 300.400-401</p>	<ul style="list-style-type: none"> a. consideration of possible placement, admissions process; b. IEP development and implementation and roles in 3-year eligibility re-determinations; c. Contents and general arrangements for executing contracts with placing school districts; d. Participation of the private or public school program as well as school district representatives at the TEAM and other key meetings, including reviewing/revising the IEP; e. Written progress reports; f. Documentation regarding student-related developments, including matters involving students' behavioral plans, functional behavioral assessments, manifestation determinations, imposition of discipline, etc. g. Administration of tests; h. Preparations that are made for the student's return to a public school or other less restrictive setting; i. Preparations for students approaching or reaching ages 14, 16 and 18, later education, and adult life, consistent with IDEA "transition" requirements and state age-of-majority law and j. school district monitoring of student progress.
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Staff interviews and documentation review indicate that (d) IEP TEAM meetings do not always include participation by the sending school district representatives, (e) written progress reports are not being developed on a quarterly basis. The White Oak School develops written narrative progress reports twice yearly and alternates these reports with a checklist progress report format that does not contain a narrative describing individual progress made in meeting the goals of the IEP (i) transition requirement are not being documented in the records and the records show no documentation of (j) school district monitoring of student progress.

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

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

AREA 6: EDUCATIONAL PROGRAM REQUIREMENTS -- STUDENT LEARNING TIME
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CRITERION NUMBER	
	Legal Standard
6.1 Daily Instructional Hours 603 CMR 27.00	The private school provides an average annual minimum of the following instructional hours: a. Elementary: 5 hours per school day b. Secondary: 5 ½ hours per school day
	Rating: Implemented RESPONSE REQUIRED: No

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

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

CRITERION NUMBER	
	Legal Standard
7.1 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: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
7.2 Staff Training 28.09(9)(b)	The private school shall ensure that all staff responsible for implementing services as specified on students' Individualized Education Programs have an understanding and knowledge of the general curriculum expectations and learning standards of the Massachusetts Curriculum Frameworks and shall incorporate such knowledge into the school's educational program.
	Rating: Implemented RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
28.09(9)(d)	
	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) 34 CFR 300.24	<p>The private school specifies how each of the following educational services are Implemented for the described student population of the school:</p> <ul style="list-style-type: none"> a. All Massachusetts Curriculum Frameworks b. Curriculum of the Placing District including high school graduation requirements c. Self-help, Daily Living Skills d. Social/Emotional Needs e. Physical Education; Adapted Physical Education f. Pre-Vocational, Vocational, and Career Education g. Other: any other specialized educational service(s) provided by the program
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.2 Implementation -- Related Services	<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)

CRITERION NUMBER	
	Legal Standard
28.04 and 28.09(8) 34 CFR 300.24	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) (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.)
	Rating: Implemented RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
8.4 Current IEP & Student	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

CRITERION NUMBER	
	Legal Standard
Roster 28.09	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 IEP Implementation 28.09	The private school program implements all services on the students' IEP.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.7 IEP-Progress Reports	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.

CRITERION NUMBER	
	Legal Standard
28.07(3) 20 U.S.C. Chapter 33, Section 1414(d)(1)(A) (viii) 34 CFR 300.347	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:

Review of documentation and staff interviews indicate that written progress reports are not being developed on a quarterly basis. The White Oak School develops written narrative progress reports twice yearly and alternates these reports with a checklist progress report format that does not contain a narrative describing individual progress made in meeting the goals of the IEP.

CRITERION NUMBER	
	Legal Standard
8.8 IEP- Revisions and Changes 34 CFR 300	The private school notifies the public school and parents whenever the IEP needs to be revised to reflect a change in goals, placement, or a return to a less restrictive setting. In no case does the private school conduct a Team meeting without the authorization and presence of an administrative representative of the responsible school district. In no case does the private school issue a new or revised IEP for a student.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.9 IEP- Less Restrictive Placement	The private school program has a plan for ensuring that there are flexible procedures and mechanisms that maximize opportunities for enrolled students to gain the capacity to return to a less restrictive educational program. Such mechanisms may include, but are not limited to, a capacity for part-time attendance at a public school

CRITERION NUMBER	
	Legal Standard
28.09(9)(c)	or general education classroom, or other community program or a period of transition from one program option to a less restrictive program option.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
8.10 IEP- Transition Planning 34 CFR 300.347(b)(1) 34 CFR 300.347(b)(2)	For students who are fourteen (14) years of age or older, the private school works with the responsible school district to ensure that the IEP includes both a vision statement and documentation that describes transition <u>needs</u> . For students who are sixteen (16) years of age or older, the private school works with the responsible school district to ensure that the IEP contains both a vision statement and a statement of needed transition <u>services</u> including, if appropriate, a description of interagency responsibilities or any needed linkages.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews and review of documentation indicate that while there is a vision statement for all students over the age of 14 years, the IEP contains no documentation of transition needs, goals, objectives or services.

CRITERION NUMBER	
	Legal Standard
8.11 IEP- Transition Services 28.05(4)(c)	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. 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 22 nd birthday) in accordance with the requirements of MGL c.71, §12A-§12C (known as Chapter 688).

CRITERION NUMBER	
	Legal Standard
	Rating: Implemented RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
9.1 Policies and Procedures 18.05(5)	The private school develops a comprehensive set of policies and procedures dealing with discipline and behavior management that meet all federal special education requirements, and all applicable state and federal requirements pertaining to the use of restraint. (See Criterion 9.4 below.) These policies and procedures are consistently Implemented.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

The school has no policy for restraint or restraint training. During the week of the Program Review a senior administrator was attending CPI training.

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	
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	Legal Standard		
9.3 Runaway Students 18.03(10)	<p>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.</p> <p>This policy is approved by the Department of Education.</p> <p>The school notifies the Department and parents immediately whenever any student runs away.</p>		
	Rating: Implemented	RESPONSE REQUIRED:	No

CRITERION NUMBER	Legal Standard		
9.4 Restraints 18.05 (5)(h) 603 CMR 46.00 102 CMR 3.00	<p>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.</p> <p>A residential educational program complies with the OCCS restraint requirements contained in 102 CMR 3.00 for all students enrolled in such program.</p> <p>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.</p>		
	Rating: Not Implemented	RESPONSE REQUIRED:	Yes

Department of Education Findings:

The school has no policy of procedure for the use of restraint. During the onsite visit a senior administrative staff person was taking the CPI trainer program.

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> <p>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.</p>		

CRITERION NUMBER	
	Legal Standard
	<p>b. No student may be suspended and sent home unless a responsible adult is available to receive the student.</p> <p>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.</p> <p>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> <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>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p>9.6</p> <p>10+ Day Suspensions</p> <p>Joint responsibilities of the private school and the responsible school district</p> <p>34 CFR 300.519-529</p>	<p>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> <p>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;</p> <p>b. The private school participates in the Team meeting:</p> <p>(1) to develop or review a functional behavioral assessment of the student’s behavior and to develop or modify a behavior intervention plan;</p> <p>(2) to identify appropriate alternative educational setting(s); and</p> <p>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?].</p> <p>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.</p> <p>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</p>

CRITERION NUMBER	
	Legal Standard
	the placement.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
9.7 Terminations	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.
18.05(7)	The program has developed a written termination policy that includes, but is not limited to, the following:
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: Implemented RESPONSE REQUIRED: No

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

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

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

CRITERION NUMBER	
	Legal Standard
10.3 Programs for Young Children 28.09(7)(e) 28.06(7)	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.
	Rating: Not Applicable RESPONSE REQUIRED: No

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 or greater than 8:1 during sleeping hours.
	Rating: Not Applicable RESPONSE REQUIRED: No

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

**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: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Staff Interviews indicate that (f) procedures for screening prospective and current staff members not being done at the time of the site visit.

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="261 411 321 443">11.3</p> <p data-bbox="212 478 370 642">Educational Administrator Qualifications</p> <p data-bbox="220 678 362 709">28.09(7)(a)</p> <p data-bbox="228 745 354 842">603 CMR 44.00 and 44.04</p>	<p data-bbox="407 411 1398 541">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="407 548 857 579">a. certification as a special educator; <li data-bbox="407 579 1325 611">b. a minimum of a master's degree in special education or a related field; and <li data-bbox="407 611 1068 642">c. a minimum of one year of administrative experience. <p data-bbox="407 678 1377 741">The educational administrator has been re-certified pursuant to the requirements of 603 CMR 44.00.</p> <p data-bbox="407 741 1260 804">The educational administrator has obtained supervisor approval of his/her Professional Development Plan per 603 CMR 44.04.</p> <p data-bbox="407 804 418 835">.</p>
	<p data-bbox="407 852 688 884">Rating: Implemented</p> <p data-bbox="922 852 1341 884" style="text-align: right;">RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p data-bbox="261 1155 321 1186">11.4</p> <p data-bbox="204 1222 378 1417">Special Education Teachers and Regular Education Teachers</p> <p data-bbox="204 1453 378 1516">28.09(7)(b)(c) 18.05(11)(f)</p>	<p data-bbox="407 1155 1393 1285">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 1291 1393 1421">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 1434 1393 1564">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 1577 1393 1673">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 1686 1349 1749">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 1806 688 1837">Rating: Implemented</p> <p data-bbox="922 1806 1341 1837" style="text-align: right;">RESPONSE REQUIRED: No</p>

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: Not Applicable RESPONSE REQUIRED: No

Department of Education Findings:
The school does not provide related services.

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 28.09(7) 28.07(c)	The program demonstrates that its organizational structure provides for the effective and efficient operation of the school, supervision of school staff and supervision of students.
	Rating: Commendable RESPONSE REQUIRED: No

Department of Education Findings:

Supervision and support by administrators to teaching staff is commendable. Each teacher is formally observed on a bi-weekly basis and receives a written review and supervisory input after each observation. The supervisory review is used to modify and improve each student's classroom experience.

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: Not Applicable RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
11.12 Plan for Staff Coverage 18.03(1)(b)4	<p>Each private special education program provides a detailed description of how the school will provide childcare and/or overall staff coverage in the absence of workers due to illness, staff vacancies, emergencies, or other unexpected circumstances.</p>
	Rating: Implemented RESPONSE REQUIRED: No

<p>AREA 12: EDUCATIONAL STAFFING REQUIREMENTS -- STAFF TRAINING</p>
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CRITERION NUMBER	
	Legal Standard
12.1 Staff Orientation Training	<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</p>

CRITERION NUMBER	
	Legal Standard
18.05(11)(g)	<p>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 participated in all mandated training through their orientation program.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p>12.2</p> <p>Annual In-Service Training Plan and Calendar</p> <p>28.09(7)(f)</p> <p>18.05(11)(h)</p>	<p>The private special education program develops and implements a written plan for staff orientation and training that is consistent with the needs of the student population, appropriate to the role of each staff member and provides, on average, at least two (2) hours per month of relevant training for all staff including non-professional staff (child care workers/direct care staff on all shifts). Staff input is elicited and considered.</p> <p>The following topics are required in-service training topics and are offered annually to all staff providing direct care services to students:</p> <ol 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:

Staff interviews and review of documentation indicates that (d) transportation safety training and (h) restraint procedure training were being conducted at the time of the onsite.

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: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews indicate that restraint training is not being conducted at the school. During the onsite week a senior administrator was at a training to become certified as a restraint trainer.

CRITERION NUMBER	
	Legal Standard
12.2 (b) Child Abuse Reporting 18.05(9)(j)	<p>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).</p>
	Rating: Implemented RESPONSE REQUIRED: No

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

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

Department of Education Findings:

Nursing services are provided at the school by the Westfield Public Schools through a grant program.

CRITERION NUMBER	
	Legal Standard
12.2 (e) Student Record Training 28.09(10)	<p>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.</p>
	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: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
12.2 (g) Interns and Volunteers Training 18.05 (11)(I)	<p>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.</p>

CRITERION NUMBER	
	Legal Standard
	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: Not Applicable 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.
	Rating: Implemented RESPONSE REQUIRED: No

AREA 13: PHYSICAL FACILITY AND EQUIPMENT REQUIREMENTS

CRITERION NUMBER	
	Legal Standard
<p align="center">13.1</p> <p>Educational Facilities and Materials</p> <p align="center">29.09(8)</p>	<p>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.</p>
	<p>Rating: Commendable RESPONSE REQUIRED: No</p>

Department of Education Findings:

Every classroom in the school has an individual computer for each student in that class. The computers are linked to enable students to access their personal folder containing all of their written work from any computer at the school.

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

CRITERION NUMBER	
	Legal Standard
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
13.7 Indoor Space	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.
18.04(7)(a)	<p>Additionally, the program:</p> <ul style="list-style-type: none"> 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 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

CRITERION NUMBER	
	Legal Standard
13.8 Outdoor Space	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.
18.04(7)(b)	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
14.2 Food and Nutrition 18.03(7)	The school's staff understands the nutritional requirements of the students enrolled and provides an appropriate number of meals daily (three meals daily for residential programs), at reasonably appropriate times, which constitute a nutritionally adequate diet.
	Rating: Not Applicable RESPONSE REQUIRED: No

Department of Education Findings:

The school provides no food services at this time.

CRITERION NUMBER	
	Legal Standard
14.3 Toileting Procedures and Individual	For enrolled students who are incontinent, the private school develops and implements a written plan describing required procedures including regular toileting and diapering, disposal or laundering of soiled clothing or diapers and protecting the personal privacy of all students. Toilet training plans are developed based on parental input, the IEP and the student's

CRITERION NUMBER	
	Legal Standard
Plans 18.03(8)	physical and emotional abilities.
	Rating: Not applicable RESPONSE REQUIRED: No

AREA 15: PARENT AND STUDENT INVOLVEMENT
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CRITERION NUMBER	
	Legal Standard
15.1 Parent Involvement and Parents' Advisory Group 18.05(4)(a)	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. The program has designated a staff person to support the Parents' Advisory Group.
	Rating: Not Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews and review of documentation indicate that there is not a Parents Advisory Group in place. Interviews indicate that such a group has been in place during previous years but was not organized for this school year.

CRITERION NUMBER	
	Legal Standard
Consultation 18.05(9)(a)	
	Rating: Implemented RESPONSE REQUIRED: No

Department of Education Findings:

Physician consultative services are provided at the school by the Westfield Public Schools.

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

Department of Education Findings:

Nursing services are provided at the school by the Westfield Public Schools.

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

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

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">16.6</p> <p>Administra- tion of Antipsychotic Medication</p> <p>18.05(9)(f)(9)</p>	<p>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:</p> <ol style="list-style-type: none"> 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 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; 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; 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; 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. 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). 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>Rating: Implemented RESPONSE REQUIRED: No</p>

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: Implemented RESPONSE REQUIRED: No</p>

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>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

AREA 17: TRANSPORTATION SAFETY

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

Department of Education Findings:

The school does not provide appropriate inservice training to its staff on transportation safety.

AREA 18: STUDENT RECORDS

CRITERION NUMBER	
	Legal Standard
<p>18.1</p> <p>Student Records</p>	<p>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.</p>
<p>28.09(10)</p>	
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">18.2</p> <p>Student Records</p> <p>28.09(10)</p> <p>MGL c.71, s. 34H</p> <p>603 CMR 23.00</p> <p>Family Educational Rights and Privacy Act (FERPA)</p>	<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 • 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>

CRITERION NUMBER	
	Legal Standard
	Rating: Implemented RESPONSE REQUIRED: No

PRIVATE SCHOOL PROGRAM REVIEW REPORT 2002.doc

File Name: White Oak School

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