



LIGHTHOUSE SCHOOL

PRIVATE SPECIAL EDUCATION SCHOOL PROGRAM REVIEW REPORT OF FINDINGS

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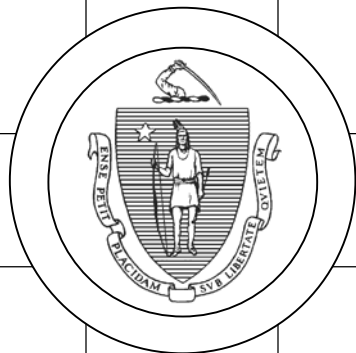
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**MASSACHUSETTS DEPARTMENT OF EDUCATION
PRIVATE SPECIAL EDUCATION SCHOOL PROGRAM REVIEW**

**Lighthouse 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 2003-2004 review cycle were notified in September 2003 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: All approved private schools in the Commonwealth are monitored through the Department's Private School Program Review system on a six-year cycle with an additional mid-cycle follow up visit. This six-year monitoring and follow up 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 2003-2004 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 1997-2002 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 three-member Massachusetts Department of Education team visited Lighthouse School during the week of April 5, 2004, 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 Lighthouse School. These features are as follows:

- *Lighthouse School has developed and implemented extensive family and community therapy programs that are aimed at educating the whole child and the environment in which he or she lives. The program provides a 24-hour hotline in which families in crisis can contact on-call staff at the program in order to gain coping skills/support in dealing with their child at home.*
- *Lighthouse School has developed and implemented comprehensive behavior management policies and procedures that permeate all aspects of the program. Staff consistently implemented these procedures and students are able to convey the details of the policy. Students are rewarded for positive behaviors with tokens and are able to redeem the tokens at the school store. Lighthouse reinforces the importance of positive behaviors while integrating daily living skills and math concepts. In addition, Lighthouse School employs several well-trained and effective behavior management specialists that can be called on by staff to de-escalate children in crisis so that learning continues to take place and classroom order can be maintained. The behavior management system in place at the program works like a “well-oiled machine.”*
- *Lighthouse School truly encourages the personal and professional growth of its staff. The program provides all required mandated trainings and exceeds the required monthly minimum hours. Staff reported feeling very well trained on relevant issues they are facing in the program. In addition, Lighthouse School has developed and implemented a thorough staff orientation-training program for all new staff. The process involves a four-week training/shadowing program in which new staff are able to view all aspects of the program before being assigned direct care duties. Staff reported feeling thoroughly prepared and supported throughout the orientation process.*
- *Lighthouse School has developed an extensive school library for both its students and staff. The student library is well maintained and filled with a variety of materials. Staff can bring individual students, small groups, or whole classes to the library to browse or for structured lessons. In addition, the program has developed a separate reference room for staff and parents that is user-friendly, organized, and updated with current research and trends in education.*
- *Lighthouse School staff are dedicated and report feeling a sense of camaraderie throughout the program. Staff reported being able to seek support and guidance from anyone on staff without feeling they are being judged. In addition, staff receive formal supervision meetings once a week, but reported an “open door” policy in which they are able to speak with anyone on staff at any time.*

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 eight (8) administrative staff.
- Interviews of three (3) clinical staff.
- Interviews of ten (10) teaching and educational support services staff.
- Interviews of three (3) child care staff.
- Interviews of one (1) nursing staff.
- Interviews of one (1) Parent Group representatives and of two (2) other parents of Massachusetts students enrolled in the school.
- Student record review: A sample of twenty-four (24) Massachusetts student records were selected by the Department. Student records were first examined by the school's staff and then verified by the onsite team using standard Department of Education student record review procedures to make determinations regarding the implementation of procedural and programmatic requirements.
- Observation of classrooms and other facilities: A sample of ten (10) instructional classrooms and other school facilities used in the delivery of programs and services was visited to determine general levels of compliance with program requirements.

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

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

PRIVATE SCHOOL PROGRAM REVIEW REPORT

EXECUTIVE SUMMARY

Lighthouse School

The following summary synthesizes the findings for compliance standards included in this Private School Program Review Report. Note that a more detailed discussion of the onsite team's findings, together with the specific legal standards for each program area included in this review, follows this summary.

Component I: Program Description

Lighthouse School has developed a clear description of its program and students that includes philosophy, goals and objectives, mechanisms for the delivery of services and an identified population to be served.

Component II: Approvals, Licenses, and Inspections

Lighthouse School maintains current approvals, licenses, and certificates of inspection by state and local agencies that are located in a conspicuous place available for public and employee review.

Component III: Program Policies and Procedures

Lighthouse School has developed comprehensive policies and procedures that meet all criteria specified in the regulations. In addition, the program has developed a Policy and Procedures Manual, a Personnel Policies Manual, and a Health Care Manual that meet all regulatory requirements.

Component IV: Required Notifications

Lighthouse School has made all required notifications of substantial changes to the program and physical plant as well as of incidents, extended restraints, and restraints resulting in student injury where applicable.

Component V: Student Learning Time

Lighthouse School currently provides the requisite number of days annually. However, the program does not provide the average annual minimum instructional hours of 5 ½ hours per school day for secondary students.

Component VI: Curriculum and Instruction

Lighthouse School has developed a curriculum that is aligned with the Massachusetts Curriculum Frameworks. A team of Lighthouse staff work throughout the summer to review the existing curriculum and align any new materials with the frameworks. In addition, the team develops a practical guide for teachers that ensures all students have access to appropriate curricular materials and is designed to maximize students' performance and participation in the general curriculum. Lighthouse School staff have a full understanding of the connection between the Frameworks and the expectations of the state for student performance, as well as the rights of their students to be full participants in the general curriculum. In addition, the program ensures that all enrolled students participate in state and/or local district assessments.

Component VII: Individualized Education Programs

Lighthouse School maintains current, signed IEPs for all students enrolled in the program and ensures that the students are receiving educational, related, and supplementary services as specified on their IEPs. In addition, progress reports are being issued quarterly; however, they do not correlate to the annual goals outlined in student IEPs. Evidence that such progress reports are being sent to parents, guardians, sending school districts, and other involved state agencies is not maintained in the students' files.

Lighthouse School works hard to ensure that all students have the opportunity to return to a less restrictive educational program. For students who are 14 years of age or older, Lighthouse School works with the responsible school district to ensure that the IEP includes both a vision statement and a description of transition needs. For students 16 years of age or older, the program ensures that the IEP reflects any interagency responsibilities and/or needed linkages to outside agencies. Finally, for students approaching graduation or the age of 22, Lighthouse School works with the responsible district to make any necessary referrals to the Bureau of Transitional Planning.

Component VIII: Student Discipline and Behavior Management

Lighthouse School has developed and implemented comprehensive and commendable behavior management policies and procedures that permeate all aspects of the program and meet all special education requirements as well as all applicable state and federal requirements pertaining to the use of physical restraints. Staff consistently implemented these procedures and students are able to convey the details of the policy. In addition, Lighthouse School employs several well-trained and effective behavior management specialists that can be called on by staff to de-escalate children in crisis so that learning continues to take place and classroom order can be maintained. Lighthouse School's policies regarding suspensions and terminations, however, do not meet all state regulatory requirements.

Component IX: Staffing

Lighthouse School maintains appropriate staff-to-student ratios throughout the day. However, the program does have at least one instructional grouping that exceeds the maximum age range of forty-eight months. In addition, several teachers are working in areas in which they do not hold appropriate licensure. Furthermore, at least half of the teaching staff are not licensed in special education areas appropriate to the population or do not hold current, valid waivers. The program encourages communication at all levels, provides formal supervision at least weekly for all staff, and maintains an "open door" policy, encouraging staff to share any questions or concerns that may arise. In addition, staff are provided with numerous professional development opportunities. However, Lighthouse School does not provide annual, written evaluations for all staff.

The organizational structure in place at Lighthouse School provides for a highly effective and efficient operation of the school. Staff have a clear understanding of their roles and responsibilities and are able to provide students with supervision at all times. Lighthouse School has developed and implemented written personnel policies and procedures. However, the program's policies do not include a statement of equal employment opportunities in regard to sexual orientation.

Component X: Staff Training

Lighthouse School has developed and implemented a thorough staff orientation-training program for all new staff. The process involves a four-week training/shadowing program in which new staff are able to view all aspects of the program before being assigned direct care duties. The program provides all required mandated trainings and exceeds the required monthly minimum hours. In addition, Lighthouse School is commended on the mechanism in place for tracking staff participation and time in training.

Component XI: Facility and Equipment

The school has provided the facilities, textbooks, equipment, technology, materials, and supplies necessary to provide special education and related services specified on students' IEPs. In addition, the program has developed an extensive library for both staff and students. Although the building itself is fully accessible, Lighthouse School does not have appropriate transportation for students with limited physical mobility to engage in field trips and community vocational opportunities.

Component XII: Nutritional Requirements

Lighthouse School staff have an understanding of the nutritional requirements of students enrolled in the program. In addition, student allergies are noted and posted in conspicuous locations.

Component XIII: Parent and Student Involvement

Lighthouse School has developed a written plan for involving parents, including a commendable community and family therapy program as well as a Parents' Advisory Group. The program has developed orientation procedures for new students and parents and takes all necessary steps to ensure student participation in Team meetings where appropriate. Lighthouse School does not obtain all necessary parental consent forms upon initial enrollment and annually thereafter. Missing consent forms include medication administration, research, field trips, and notification of curriculum that involves human sexual education or human sexuality issues. The program has developed written procedures for complaints pertaining to students' education and care; however, they have not been made available to both students and parents.

Component XIV: Student Records

Although Lighthouse School keeps current files for each publicly funded enrolled Massachusetts student, the files do not contain all required elements. The program must update student face sheets with the date of admission to the program. In addition, the program does not ensure that all pertinent correspondence concerning the student is kept in the students' files, including consents to evaluate as well as Parent Advisory Group notices.

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
applicable to Day Schools)	
	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: <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

CRITERION NUMBER	
	<p style="text-align: center;">Legal Standard</p> <p>accessible in each major activities area;</p> <ul style="list-style-type: none"> 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. The current DOE IEP Process Guide and IEP Forms e. State restraint regulations (for day schools) <p>*Private schools shall provide written notice to parents of enrolled students that copies of policies and procedures are available upon request.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

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> <ul 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. any ongoing difficulty in recruitment or maintenance of mandated staff that affect the care of and/or delivery of IEP services to students; c. building changes that affect the care of the students; d. major changes in the population to be served; e. any alteration of the service configuration of the program as last approved by the Department; and f. 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> <ul 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

CRITERION NUMBER	
	Legal Standard
	<p>mental health crisis which occurs while the student is in the program</p> <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.
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

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 examination of the student within thirty (30) days of admission;

CRITERION NUMBER	
	Legal Standard
	c. a complete and thorough description of the interview process; and d. consent forms.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

A review of student records and documentation revealed that Lighthouse School does not receive and maintain all required consent forms annually. Specifically, the program is missing annual emergency medical treatment consent as well as consent to participate in research or publicity.

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 style="text-align: center;">5.3</p> <p>Contents of Coordination and Collaboration with Public School Districts</p> <p>28.06(2-3) 28.07(5) 28.09(9)(c) &(d) 28.09(2)(b)(7)</p> <p>34 CFR 300.349 and 300.400-401</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> <ol 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; j. school district monitoring of student progress; k. the granting of “high school diplomas” consistent with Department of Education requirements; and l. the conditions for the issuance of any “certificates” of attendance or program completion by the private school.
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

A review of documentation revealed that Lighthouse School does not maintain written policies and procedures that fully address subsections c, i, and j.

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

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

AREA 6: EDUCATIONAL PROGRAM REQUIREMENTS -- STUDENT LEARNING TIME

CRITERION NUMBER	
	Legal Standard
6.1 Daily Instructional	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

CRITERION NUMBER	
	Legal Standard
Hours 603 CMR 27.00	
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Observations and documentation review indicated that Lighthouse School does not provide the average annual minimum instructional hours of 5 ½ hours per school day for secondary students.

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)	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

CRITERION NUMBER	
	Legal Standard
	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 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

CRITERION NUMBER	
	Legal Standard
34 CFR 300.24	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: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

Staff interviews and a review of documentation indicated that Lighthouse School does not specify how the following services will be implemented: assistive technology devices/service and language needs (limited English proficient students).

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: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

A review of documentation indicated that Lighthouse School has not prepared a narrative outlining the kinds of supplementary aids and services that are available for students enrolled in the program.

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

CRITERION NUMBER	
	Legal Standard
<p data-bbox="272 380 310 407">8.7</p> <p data-bbox="237 447 345 541">IEP- Progress Reports</p> <p data-bbox="240 581 342 609">28.07(3)</p> <p data-bbox="207 648 375 810">20 U.S.C. Chapter 33, Section 1414(d)(1)(A) (viii)</p> <p data-bbox="240 850 342 907">34 CFR 300.347</p>	<p data-bbox="407 380 1401 541">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.</p> <p data-bbox="407 548 1235 609">Copies of progress reports are maintained in student records, including documentation of persons or agencies receiving such reports.</p>
	<p data-bbox="407 926 792 953">Rating: Partially Implemented</p> <p data-bbox="922 926 1349 953">RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

A review of documentation indicated that although progress reports are being issued quarterly, they do not correlate to the annual goals outlined in students' IEPs. In addition, Lighthouse School does not maintain documentation in the student records as to whom the progress reports are being sent.

CRITERION NUMBER	
	Legal Standard
<p data-bbox="272 1400 310 1428">8.8</p> <p data-bbox="203 1467 376 1562">IEP- Revisions and Changes</p> <p data-bbox="215 1602 363 1629">34 CFR 300</p>	<p data-bbox="407 1400 1377 1495">The private school notifies the responsible public school and parents whenever the IEP needs to be revised to reflect a change in goals, placement, or a return to a less restrictive setting.</p> <p data-bbox="407 1535 1398 1596">In no case does the private school conduct a Team meeting without the authorization and presence of an administrative representative of the responsible school district.</p> <p data-bbox="407 1635 1279 1663">In no case does the private school issue a new or revised IEP for a student.</p> <p data-bbox="407 1703 1398 1864">In no case does the private school provide notice of a Team meeting required by state and federal special education requirements. 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 shall the private school issue a new or revised IEP for a student.</p>
	<p data-bbox="407 1879 675 1906">Rating: Implemented</p> <p data-bbox="922 1879 1339 1906">RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
	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).
	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: Commendable RESPONSE REQUIRED: No

Department of Education Findings:

Lighthouse School has developed and implemented comprehensive behavior management policies and procedures that pervade all aspects of the program. Staff consistently implemented these procedures and students are able to convey the details of the policy. Students are rewarded for positive behaviors with tokens and are able to redeem the tokens at the school store. Lighthouse reinforces the importance of positive behaviors while integrating daily living skills and math concepts. In addition, Lighthouse School employs several well-trained and effective behavior management specialists that can be called on by staff to de-escalate children in crisis so that learning continues to take place and classroom order can be maintained.

CRITERION NUMBER	
	Legal Standard
9.2	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

CRITERION NUMBER	
	Legal Standard
Discipline Code IDEA-97	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)	<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: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">9.5</p> <p style="text-align: center;">3-5 Day Suspensions</p> <p style="text-align: center;">18.05(6)</p>	<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> <ol 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>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

A review of documentation revealed that Lighthouse School’s written policy on 3-5 day suspensions does not meet all of the required elements as outlined above.

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">9.6</p> <p style="text-align: center;">10+ Day Suspensions</p> <p style="text-align: center;">Joint responsibilities</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> <ol style="list-style-type: none"> 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; b. The private school participates in the Team meeting: <ol style="list-style-type: none"> (1) to develop or review a functional behavioral assessment of the student’s behavior and to develop or modify a behavior intervention plan; (2) to identify appropriate alternative educational setting(s); and

CRITERION NUMBER	
	Legal Standard
of the private school and the responsible school district 34 CFR 300.519-529	<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 the placement.</p>
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

A review of documentation revealed that Lighthouse School’s written policy on 10+ day suspensions does not meet all of the required elements as outlined above.

CRITERION NUMBER	
	Legal Standard
9.7 Terminations 18.05(7) 28.09(12)(b)	<p>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>The program has developed a written termination policy that includes, but is not limited to, the following:</p> <p>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.</p> <p>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.</p> <p>c. For <u>planned</u> terminations, the private special education program notifies the public school district of the need for an IEP review meeting and provides notice of this meeting to all appropriate parties ten (10) days in advance of the intended date of the meeting. The purpose of the meeting will be to develop a clear and specific termination plan for the student that shall be implemented in no less than</p>

CRITERION NUMBER	
	Legal Standard
	<p>thirty (30) days unless all parties agree to an earlier termination date.</p> <p>d. For <u>emergency</u> terminations, which are circumstances where the student presents a clear and present threat to the health and safety of him/herself or others, the program follows the procedures required under 603 CMR 28.09(12)(b) and immediately notifies the Department of Education.</p>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

A review of documentation revealed that Lighthouse School’s written policy on terminations does not meet all of the required elements as outlined above.

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 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: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Interviews and observations revealed that Lighthouse School has an instructional grouping where the oldest and youngest child's ages differ by more than forty-eight months (4years). The class includes students with an age range of sixteen (16) through twenty-one (21).

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

Department of Education Findings:

Lighthouse School does not currently have any classrooms for young students.

CRITERION NUMBER	
	Legal Standard
<p>10.4 Student: Child Care Ratios</p> <p>28.09(7)</p>	<p>The program has a student to child care worker ratio of:</p> <p>a. not lower than 4:1 nor greater than 6:1 during non-“school day” waking hours, and</p> <p>b. not lower than 6:1 nor greater than 8:1 during sleeping hours.</p>

CRITERION NUMBER	
	Legal Standard
18.01(2)	
	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
11.1 Personnel Policies 28.09(7) 28.09(11)(f) 18.05(11)	The private special education program has developed written personnel policies and procedures that describe: <ul style="list-style-type: none"> a. Criteria and procedures for hiring, written evaluations, suspension or dismissal of any staff person; and development of teacher and staff evaluation forms; b. Procedures for handling staff complaints; c. Provisions for vacations, holidays, leaves, sick days, and any other benefits offered by the program; d. A plan for using volunteer and/or intern services; e. Equal employment/educational opportunities/affirmative action in regard to race,

CRITERION NUMBER	
	Legal Standard
	<p>color, creed, national origin, sex, sexual orientation and handicap; and</p> <p>f. Procedures for accessing, considering and acting upon Criminal Offender Record Information (CORI) for any prospective staff member whose responsibilities would bring them into direct contact with students in the program. [NOTE: Massachusetts law also allows approved public and private special education school programs to obtain and review the CORI of <u>current employees</u>. Approved special education school programs should obtain CORI in regard to a current employee when, in the judgment of the program director, there is a reasonable basis for review of the employee's CORI and the purpose of such a review is to ensure the health and safety of the students enrolled in the program. For applicants or employees who reside outside of Massachusetts, approved special education schools should obtain and review criminal record information from the state of residence of the applicant or employee on the same basis as it does for applicants and employees who reside in Massachusetts.]</p>
	<p>Rating: Partially Implemented RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Documentation review indicated that Lighthouse School's written personnel policies and procedures do not include a statement of equal employment/educational opportunities/affirmative action in regard to sexual orientation.

CRITERION NUMBER	
	Legal Standard
<p>11.2</p> <p>Adminis- trative Responsibi- lity</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
11.3	The private school designates an educational administrator to supervise the provision

CRITERION NUMBER	
	Legal Standard
Educational Administrator Qualifications	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 b. certification as a special educator; c. a minimum of a master's degree in special education or a related field; and d. a minimum of one year of administrative experience.
28.09(7)(a)	The educational administrator has been re-certified pursuant to the requirements of 603 CMR 44.00.
603 CMR 44.00 and 44.04	The educational administrator has obtained supervisor approval of his/her Professional Development Plan per 603 CMR 44.04. .
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
11.4	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:
Special Education Teachers and Regular Education Teachers	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.
28.09(7)(b)(c)	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.
18.05(11)(f)	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.
	d. To the extent that teaching staff is providing special education services, such services are provided, designed, or supervised by a special educator.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

A review of documentation indicated that several Lighthouse teachers are working in areas in which they do not hold appropriate licensure. In addition, at least half of the teaching staff are not licensed in special education areas appropriate to the population or do not hold current, valid waivers.

Finally, Lighthouse School does not ensure that all teaching staff have obtained supervisor approval

of a Professional Development Plan that is maintained in personnel files.

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">11.5</p> <p style="text-align: center;">Related Services Staff</p> <p style="text-align: center;">28.09(7)(d)</p>	<p>All staff providing or supervising the provision of related services are appropriately certified, licensed or registered by their respective state boards or professional associations.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">11.6</p> <p style="text-align: center;">Master Staff Roster</p> <p style="text-align: center;">28.09(7)</p>	<p>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).</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p style="text-align: center;">11.9</p> <p style="text-align: center;">Organizational Structure</p> <p style="text-align: center;">28.09(7) 28.07(c)</p>	<p>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.</p>
	<p>Rating: Commendable RESPONSE REQUIRED: No</p>

Department of Education Findings:

The organizational structure in place at Lighthouse School provides for a highly effective and efficient operation of the school. The program consists of directors, coordinators, program team, and line staff. Staff have a clear understanding of their roles and responsibilities and are able to provide students with supervision at all times. In addition, staff receive formal supervision meetings once a week, but reported an “open door” policy in which they are able to speak with anyone on staff at any time for guidance and support.

CRITERION NUMBER	
	Legal Standard
<p>11.10</p> <p>Supervision of Child Care Workers (Direct Care Staff)</p> <p>18.03(4)</p>	<p>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.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p>11.11</p> <p>Supervision of Students</p> <p>28.09(7) 18.03(1)</p>	<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>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p data-bbox="256 380 326 407">11.12</p> <p data-bbox="204 478 378 543">Plan for Staff Coverage</p> <p data-bbox="215 579 367 606">18.03(1)(b)4</p>	<p data-bbox="407 380 1396 474">Each private special education program provides a detailed description of how the school will provide childcare and/or overall staff coverage in the absence of workers due to illness, staff vacancies, emergencies, or other unexpected circumstances.</p>
	<p data-bbox="407 625 675 653">Rating: Implemented</p> <p data-bbox="919 625 1349 653" style="text-align: right;">RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

Although observations and interviews indicated that Lighthouse School implements a clear plan for overall staff coverage, the program did not provide a detailed written description of its plan for staff coverage.

AREA 12: EDUCATIONAL STAFFING REQUIREMENTS -- STAFF TRAINING

CRITERION NUMBER	
	Legal Standard
<p data-bbox="264 1352 321 1379">12.1</p> <p data-bbox="217 1417 367 1516">Staff Orientation Training</p> <p data-bbox="215 1551 367 1579">18.05(11)(g)</p>	<p data-bbox="407 1352 1373 1482">The private special education program develops a written plan for staff orientation and provides an orientation-training program for all new staff to ensure an understanding of the school’s philosophy, organization, program, practices and goals.</p> <p data-bbox="407 1520 1365 1619">The written plan shall describe how newly hired staff are provided training on all required topics at the time of hire if the required topics have already been covered with existing staff.</p> <p data-bbox="407 1656 1300 1719">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 data-bbox="407 1766 691 1793">Rating: Commendable</p> <p data-bbox="919 1766 1341 1793" style="text-align: right;">RESPONSE REQUIRED: No</p>

Department of Education Findings:

Lighthouse School has developed and implemented a thorough staff orientation-training program for all new staff. The process involves a four-week training/shadowing program in which new staff are

CRITERION NUMBER	
	Legal Standard
28.09(10)	
	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> <ul 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:

A review of documentation revealed that Lighthouse School does not include elements a and b in its Emergency Procedures Training.

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>
	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.
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

A review of personnel files and staff interviews revealed that Lighthouse School does not provide annual, written performance evaluations for all staff.

AREA 13: PHYSICAL FACILITY AND EQUIPMENT REQUIREMENTS

CRITERION NUMBER	
	Legal Standard
13.1	The private special education program provides the facilities, textbooks, equipment,

CRITERION NUMBER	
	Legal Standard
	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

CRITERION NUMBER	
	Legal Standard
13.5 Classroom Space 18.04(6)(a)	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 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: Commendable RESPONSE REQUIRED: No

Department of Education Findings:

Lighthouse School has developed an extensive school library for both its students and staff. The student library is well maintained and filled with a variety of materials. Staff can bring individual students, small groups, or whole classes to the library to browse or for structured lessons. In addition, the program has developed a separate reference room for staff and parents that is user-friendly, organized, and updated with current research and trends in education.

CRITERION NUMBER	
Legal Standard	
<p>13.7</p> <p>Indoor Space</p> <p>18.04(7)(a)</p>	<p>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.</p> <p>Additionally, the program:</p> <ol 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.
<p>Rating: Implemented RESPONSE REQUIRED: No</p>	

CRITERION NUMBER	
Legal Standard	
<p>13.8</p> <p>Outdoor Space</p> <p>18.04(7)(b)</p>	<p>The school maintains or has access to an outdoor play area of at least seventy-five square feet per student using it at any one time.</p> <p>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.</p>
<p>Rating: Implemented RESPONSE REQUIRED: No</p>	

AREA 14: REQUIREMENTS FOR DAILY CARE

CRITERION NUMBER	
	Legal Standard
14.1 Clothing, Grooming and Hygiene 18.03(5)	<p>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.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
14.2 Food and Nutrition 18.03(7)	<p>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.</p>
	<p>Rating: Implemented RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
14.3 Toileting Procedures and Individual Plans	<p>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.</p> <p>Toilet training plans are developed based on parental input, the IEP and the student’s physical and emotional abilities.</p>

CRITERION NUMBER	
	Legal Standard
18.03(8)	
	Rating: Implemented RESPONSE REQUIRED: No

AREA 15: PARENT AND STUDENT INVOLVEMENT

CRITERION NUMBER	
	Legal Standard
15.1 Parental 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: Implemented RESPONSE REQUIRED: No

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>

CRITERION NUMBER	
	Legal Standard
18.05(1)(b)16	
	Rating: Partially Implemented RESPONSE REQUIRED: Yes

Department of Education Findings:

A review of documentation indicated that Lighthouse School does not make its written procedures used to register complaints regarding the student’s education and care at the facility available to parents and students.

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)	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.
	Rating: Implemented RESPONSE REQUIRED: No

CRITERION NUMBER	
	Legal Standard
16.2 Physician Consultation 18.05(9)(a)	The school has secured the services of a licensed physician available for consultation.

CRITERION NUMBER	
	Legal Standard
	Rating: Implemented RESPONSE REQUIRED: No

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

CRITERION NUMBER	
	Legal Standard
16.4 Emergency First Aid 18.05(9)(e)	The school has developed written policies and procedures for emergency first aid and care including: <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
<p data-bbox="266 380 318 407">16.5</p> <p data-bbox="215 447 368 541">Administra- tion of Medication</p> <p data-bbox="228 579 355 606">18.05(9)(f)</p>	<p data-bbox="407 380 1398 443">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"> <li data-bbox="407 480 1390 543">a. no medication is administered to a student without written authorization from a parent. Such authorization shall be renewed annually; <li data-bbox="407 548 1406 611">b. no prescription medication shall be administered to a student without the written order of the physician prescribing the medication to that student; <li data-bbox="407 615 1406 709">c. the school maintains written policies and procedures regarding prescriptions and administrations of medication including authorization, prepackaging and staff training; <li data-bbox="407 714 1382 777">d. any change of medication or dosage must be authorized by a new order from a physician; <li data-bbox="407 781 1398 909">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; <li data-bbox="407 913 1406 1108">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. <li data-bbox="407 1113 1382 1176">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; <li data-bbox="407 1180 1382 1243">h. a review of medications administered to a student shall be incorporated into all progress reviews conducted for the student.
	<p data-bbox="407 1262 675 1289">Rating: Implemented</p> <p data-bbox="922 1262 1341 1289" style="text-align: right;">RESPONSE REQUIRED: No</p>

CRITERION NUMBER	
	Legal Standard
<p data-bbox="266 1602 318 1629">16.6</p> <p data-bbox="204 1669 380 1797">Administra- tion of Antipsychotic Medication</p> <p data-bbox="209 1835 375 1862">18.05(9)(f)(9)</p>	<p data-bbox="407 1602 1398 1696">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> <ul style="list-style-type: none"> <li data-bbox="407 1701 1390 1795">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; <li data-bbox="407 1799 1406 1927">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; <li data-bbox="407 1932 1370 1961">c. no antipsychotic prescription shall be administered for a period longer than is

CRITERION NUMBER	
<p data-bbox="240 386 342 449">Student Records</p> <p data-bbox="233 499 349 531">28.09(10)</p> <p data-bbox="224 583 358 653">MGL c.71, s. 34H</p> <p data-bbox="230 709 352 772">603 CMR 23.00</p> <p data-bbox="215 825 367 989">Family Educational Rights and Privacy Act (FERPA)</p>	<p data-bbox="808 296 1003 327" style="text-align: center;">Legal Standard</p> <p data-bbox="407 348 1398 411">a. log of access consistent with requirements of the Massachusetts Student Record Regulations. 18.05(11)(a)</p> <p data-bbox="407 415 959 447">b. face sheets with the following information:</p> <ul style="list-style-type: none"> <li data-bbox="508 451 623 478">• Name <li data-bbox="508 485 704 512">• Date of birth <li data-bbox="508 518 724 546">• Recent picture <li data-bbox="508 552 967 579">• Date of admission to private school <li data-bbox="508 585 964 613">• Name of educational case manager <li data-bbox="508 619 1382 688">• Location of residential service within facility (if applicable), and name of residential case manager or supervisor <li data-bbox="508 695 1182 722">• Date initially eligible for special education (if known) <li data-bbox="508 728 1149 756">• Date of most recent special education evaluation(s) <li data-bbox="508 762 1040 789">• Date of next expected 3-year reevaluation <li data-bbox="508 795 1252 823">• Starting and expiration dates of current (or most recent) IEP <li data-bbox="508 829 883 856">• Primary language of student <li data-bbox="508 863 818 890">• Legal status of student <li data-bbox="508 896 1328 966">• If under 18: in custody of both parents, one parent [specify], legal guardian [specify], other [specify] <li data-bbox="508 972 1398 1041">• If 18 or over: makes own decisions; under legal guardianship [specify]; has shared role with parent in education decisions [specify] <li data-bbox="508 1047 1078 1075">• Other state agency/ies involved with student: <li data-bbox="508 1081 1295 1150">• Parent/guardian contact information: names, addresses, H & W telephone numbers, e-mails <li data-bbox="508 1157 992 1184">• Primary language of parents/guardian <li data-bbox="508 1190 1382 1251">• Contact information of persons other than parents to be contacted in an emergency (names, addresses, telephone numbers) <li data-bbox="508 1257 1214 1285">• Educational surrogate contact information (if applicable) <li data-bbox="508 1291 1289 1318">• Date of last complete physical health examination by physician <li data-bbox="508 1325 1317 1394">• Notation of allergies and/or any other medical condition affecting student's well-being, e.g., seizures <li data-bbox="508 1400 699 1428">• Medications <li data-bbox="508 1434 1382 1461">• Information specific to this student re handling of medical emergencies <p data-bbox="407 1472 602 1499">c. copy of IEP;</p> <p data-bbox="407 1505 1256 1533">d. copies of quarterly progress reports and any modification of the IEP;</p> <p data-bbox="407 1539 1052 1566">e. copy of the student's termination or discharge plan;</p> <p data-bbox="407 1572 1328 1642">f. health records, including reports, documentation of physical examinations, allergies, screening tests, results of medical care;</p> <p data-bbox="407 1648 1105 1675">g. all evaluations or assessments conducted of the student;</p> <p data-bbox="407 1682 1029 1709">h. pertinent correspondence concerning the student;</p> <p data-bbox="407 1715 1382 1785">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 data-bbox="407 1791 797 1818">j. copies of all incident reports.</p> <p data-bbox="407 1839 792 1871">Rating: Partially Implemented</p> <p data-bbox="922 1839 1349 1871" style="text-align: right;">RESPONSE REQUIRED: Yes</p>

Department of Education Findings:

A review of student records indicated that the following information is missing or incomplete in several student files:

- *face sheets with the date of admission to the private school*
- *pertinent correspondence concerning the student, including consents to evaluate as well as Parent Advisory Group notices.*

PRIVATE SCHOOL PROGRAM REVIEW REPORT 2003doc

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