



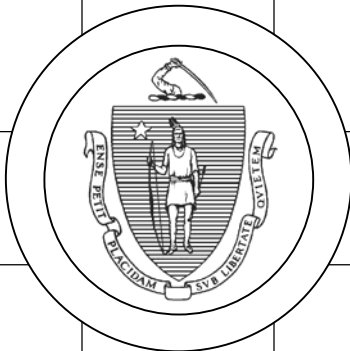
**THE WALKER HOME & SCHOOL HOME, INC.**

**Day Program – Needham  
Regular Residential Program – Needham  
Intensive Residential Program – Needham  
Beacon High School Program - Brookline**

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

**Dates of Onsite Visit: January 6-10, 2003  
Date of Draft Report: July 30, 2003  
Due Date for Comments: August 18, 2003  
Date of Final Report: April 7, 2004  
Due Date for Corrective Action Plan: May 28, 2004**

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**David P. Driscoll, Commissioner of Education**

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MASSACHUSETTS DEPARTMENT OF EDUCATION  
PRIVATE SPECIAL EDUCATION SCHOOL PROGRAM REVIEW

THE WALKER HOME & SCHOOL INC.

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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 2002-2003 review cycle were notified in September 2002 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 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 2002-2003 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 The Walker Home & School, Inc. during the week of January 6, 2003 to evaluate the implementation of selected compliance criteria under the Massachusetts Board of Education Regulations 603 CMR 18.00 (Program and Safety Standards for Approved Public or Private Day and Residential Special Education School Programs) and 603 CMR 28.09 (Approval of Public or Private Day and Residential Special Education School Programs), MGL c. 71B (“Chapter 766”) and the federal Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 *et seq.*, as amended in 1997 (IDEA-97). The team appreciated the opportunity to interview staff and parents, to observe classroom facilities, and to review the program efforts underway in the school. The review team would like to commend the following features of the school that were brought to the attention of the Department and that the team believes have a significant and positive impact on the delivery of educational services for students enrolled at The Walker Home & School, Inc.. These features are as follows:

*At both the Needham and Brookline sites:*

- *The dedication and caring that staff displayed for the students in the school was evident throughout the review through staff interviews, parent interviews and observations.*
- *The support and visibility of administrative staff throughout the educational, clinical and residential aspects of the program is evident and staff report that as a result of strong administrative presence in the program, staff feel appreciated.*
- *Based on observations, the lessons observed in the classrooms were clearly connected to the Massachusetts Curriculum Frameworks.*
- *Based on observations, staff engaged students in lots of positive reinforcement to help keep them focused and successful within the program.*

*At the Needham site:*

- *The ability of the staff, both educationally and clinically to communicate and collaborate with one another helps provide a thorough educational and clinical program for each student enrolled in the school.*
- *The strong relationship between the Board of Directors and the school, including representation from the Parent Advisory Group.*
- *The uniqueness of the expressive therapy program that offers students a warm, nurturing environment where they can express their feelings in a variety of ways.*
- *The classrooms were clean, well organized and bright and offered a variety of materials for students and teachers.*
- *The transitional services explored for students, including encouraging students to participate in after-school activities for social or recreational fun helps bridge the gap with the community.*
- *The student library contains a wide variety of material for students to use for educational or leisure activities. Residential students are also encouraged to use the library on weeknights and weekends.*
- *The teacher resource room is unique in that it is a place for teachers to go to get materials, ideas or supplies. There is a tremendous amount of resources available and staff are thus able to share resources and support each other.*
- *The school and residences are located on a picturesque land and are well maintained.*
- *The Quality Council that charges each department with setting goals and meeting with internal administrators to report on their progress helps each department maintain a big picture focus and move the school and residences forward.*

*At the Brookline site:*

- *The encouragement of staff to have students participate in a meaningful way in developing their IEP and clinical goals, as well as participating in team meetings was observed by Department of Education staff.*
- *The electives that are offered are varied to meet the individual needs and preferences of students and include: music performance, pottery, cooking, kitchen science, drama, museum display building and religion and philosophy.*
- *As needed, students receive tutoring from staff as an additional support.*
- *Beacon High School is a less restrictive alternative setting to residential treatment and works with students, their families and outside support agencies to provide the structure necessary to help the students remain out of a psychiatric hospital or a residential facility.*
- *Students have opportunities to participate in outside educational and social situations with students who do not have disabilities by attending the Harvard Extension School, participating in internships and playing on high school sports teams.*
- *Parents appreciate the numerous trainings and support groups that are offered to them and find this to be a great resource and support from the staff at Beacon high School.*

*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 nine administrative staff.
- Interviews of six clinical staff.
- Interviews of thirteen teaching and educational support services staff.
- Interviews of four child care staff.
- Interviews of one Parent Group representatives and of four other parents of Massachusetts students enrolled in the school.
- Interviews of zero representatives of state and local agencies responsible for placement of students in the school.
- Student record review: A sample of twenty Massachusetts student records was selected by the Department. Student records were first examined by the school's staff and then verified by the onsite team using standard Department of Education student record review procedures to make determinations regarding the implementation of procedural and programmatic requirements.
- Observation of classrooms and other facilities: A sample of nine 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.
- Personnel record review: A sample of ten personnel records was selected by the Department. Personnel record procedures were made regarding the implementation and programmatic 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**

<b>Commendable</b>	The criterion is implemented in an exemplary manner significantly beyond the requirements.
<b>Implemented</b>	The requirement or criterion is substantially met.
<b>Partially Implemented</b>	The requirement, in one or several important aspects, is not entirely met.
<b>Not Implemented</b>	The requirement is totally or substantially not met.
<b>Not Applicable</b>	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;"><b>1.2</b></p> <p><b>Program &amp; Student Description</b></p> <p><b>Program Capacity</b></p> <p><b>28.09(2)(b)</b> <b>(2, 3, 7)</b></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"> <li>a. Operational capacity;</li> <li>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;</li> <li>c. philosophy, goals and objectives;</li> <li>d. mechanisms for the delivery of services.</li> </ul>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*The Needham site is currently serving students enrolled in three Department of Education approved programs, which include the day program, the regular residential program and the intensive residential program. The on-site program review team was not able to determine whether students in each Department of Education approved program is receiving required teaching and residential staffing at the ratios required by the program he or she participates in. Students enrolled in the three different programs appear to be “mixed” among classrooms and residences, specifically, the regular residential program and the intensive residential program.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<p data-bbox="272 380 310 407"><b>1.3</b></p> <p data-bbox="217 447 365 506"><b>Program's Curriculum</b></p> <p data-bbox="240 546 342 573"><b>28.09(9)</b></p>	<p data-bbox="407 380 1382 474">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 data-bbox="407 514 1357 609">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 data-bbox="407 653 675 680"><b>Rating: Implemented</b></p> <p data-bbox="922 653 1341 680" style="text-align: right;"><b>RESPONSE REQUIRED: No</b></p>

**Department of Education Findings:**

*At the Needham site, there is a special events calendar that offers students the opportunity to participate in after-school activities, both socially and recreationally, which bridges the gap to the community. The Needham site also offers curriculum related field trips to students throughout the year.*

*At the Brookline site, varied electives are offered including, but not limited to, music performance, pottery, cooking, kitchen science, drama, museum display building and religion and philosophy.*

**AREA 2: ADMINISTRATION -- LEGAL AND FINANCIAL DOCUMENTATION**

CRITERION NUMBER	Legal Standard
<p style="text-align: center;"><b>2.2</b></p> <p><b>Approvals, Licenses, Certificates of Inspection</b></p> <p><b>28.09(2)(b)4-5</b></p> <p><b>28.09(5)</b></p> <p><b>28.09(6)</b></p> <p><b>18.04(1)</b></p> <p><b>102 CMR 3.06 (4)(b)</b></p>	<p>Each private school program maintains the following current licenses, approvals, and certificates of inspection by state and local agencies in a place available for public and employee review:</p> <ul style="list-style-type: none"> <li>a. Building occupancy*</li> <li>b. Safety inspection in all buildings by the Department of Public Safety or local building inspector</li> <li>c. Annual fire safety inspection by local fire department*</li> <li>d. Lead paint inspection (if applicable);* (102 C.M.R. 3.06(4)(b): “All buildings, residential or otherwise, utilized by children age six years and under or with a mental age of six years and under shall be free of lead paint.”)</li> <li>e. Health safety*</li> <li>f. Approval by local school committee (per MGL c. 76, s. 1)</li> <li>g. Approval by OCCS to operate a group care facility or a special education day care center (if applicable)*</li> <li>h. Asbestos inspection</li> <li>i. PCB inspection</li> <li>j. Other inspections that may be required by local or state authorities</li> <li>k. (If applicable) a statement as to whether previous application has been made for approval, and the action on it</li> </ul> <p>*A program with a residential component may submit the most recent OCCS license in fulfillment of those requirements marked with an asterisk (*).</p>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At the Needham site, areas d., h. and i listed above were not available for public view.*

*At the Brookline site, areas a., b., e., f., h. and i listed above were not available for public view.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>2.3</b>  <b>OCCS License (Not applicable to Day Schools)</b>	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.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**AREA 3: ADMINISTRATION -- MANUALS AND HANDBOOKS**

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>3.1</b> <b>3.2</b> <b>3.3</b>  <b>Policies and Procedures Manuals</b>  <b>28.09(11)(b)</b> <b>18.05(9)(d)</b>	<p>The private school maintains on site Policies and Procedures Manuals* that include:</p> <ol style="list-style-type: none"> <li>1. An overall manual containing policies and procedures including, but not limited to:             <ol style="list-style-type: none"> <li>a. Student Admissions</li> <li>b. Child Abuse/Neglect</li> <li>c. Student Discipline/Behavior Management</li> <li>d. Coordination/Collaboration with School Districts</li> <li>e. Emergency Procedures</li> <li>f. Educational Program Procedures</li> <li>g. Parent and Student Involvement</li> <li>h. Personnel Policies and Procedures</li> <li>i. Student Protections</li> <li>j. Student Records</li> <li>k. Research, Experimentation, Fund Raising, Publicity, Observation</li> <li>l. Suspension and Termination</li> <li>m. Staff Training</li> <li>n. Student Transportation and transportation safety</li> </ol> </li> <li>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:</li> </ol>

<b>CRITERION NUMBER</b>	
	<p style="text-align: center;"><b>Legal Standard</b></p> <ol style="list-style-type: none"> <li>a. Training of all direct service staff by a certified instructor for CPR certification and in basic and emergency first aid;</li> <li>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;</li> <li>c. written procedures for providing first aid are kept with the first aid supplies;</li> <li>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.);</li> <li>e. the procedures to be followed in the case of illness or emergency, including the transportation methods and notification of parents;</li> <li>f. the procedures to be followed in the case of fire or other emergency;</li> <li>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;</li> <li>h. the procedures to be followed in the case of illness or emergency if the parents cannot be reached;</li> <li>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;</li> <li>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.</li> <li>k. narrative description of provision of medical, nursing, and infirmary care;</li> <li>l. a written policy describing the administration of medications, per DPH regulations;</li> <li>m. administration of anti-psychotic medications including, where appropriate, “Rogers Procedures”;</li> <li>n. notification to appropriate parties of student-specific health-related incidents, injury, hospitalization, death ;</li> <li>o. notification to appropriate parties of systemic health-related problems/issues;</li> <li>p. no smoking policy (see Assurance on this subject);</li> <li>q. plan for preventive health care of students;</li> <li>r. toileting procedures</li> <li>s. name and contact information for consultant physician and emergency contacts.</li> </ol> <p>3. Special Education Regulations and Reference Materials contain at least the following documents:</p> <ol style="list-style-type: none"> <li>a. Federal IDEA regulations: 34 CFR 300.300-.577</li> <li>b. Appendix A to the above federal regulations.</li> <li>c. State regulations: 603 CMR 28.00 and 603 CMR 18.00</li> <li>d. The current DOE IEP Process Guide and IEP Forms</li> <li>e. State restraint regulations (for day schools)</li> </ol> <p>*Private schools shall provide written notice to parents of enrolled students that copies of policies and procedures are available upon request.</p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<b>Rating: Partially Implemented</b> <b>RESPONSE REQUIRED: Yes</b>

**Department of Education Findings:**

*A review of documentation revealed that the Needham and Brookline sites both need one comprehensive policies and procedures manual that includes all policies listed above. Although most policies listed above could be found in either a Walker policy and procedure, the parent handbook, or the staff manual, one manual is required that contains all of the policies and procedures listed above. In addition, the following policies listed above were not found: 1 d, 1i, 1k, 1m, 2b, 2c, 2f, 2h, 2m, 2n and 2o. The Walker Home and School, Inc. must also provide written notice to parents of enrolled students that copies of policies and procedures are available upon request on a yearly basis.*

**AREA 4: DISCLOSURE OF INFORMATION**

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p><b>4.1</b></p> <p><b>Aspects of program, staff credentials, and student records</b></p> <p><b>28.09(5)(a)</b></p>	<p>The private school makes available to the Department of Education information on all aspects of the school’s program(s), the certification and/or credentials of its staff and the individual records of enrolled Massachusetts students.</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

CRITERION NUMBER	
	<b>Legal Standard</b>
<p><b>4.2</b></p> <p><b>Public Information and Postings</b></p> <p><b>28.09(6)(a,b,c,d,e)</b></p> <p><b>28.09(2)(b)(4)</b></p>	<p>The private school maintains on site and makes available for public view the following:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b. first aid, medical and emergency procedures, location of nearest telephones within each building, and emergency telephone numbers (must be posted in each building);</li> <li>c. evacuation routes and procedures (must be posted in each room);</li> <li>d. program information including a statement of purpose, general description of educational program and an organizational chart showing the current administrative structure of the private school, including the lines of authority and staff assignments;</li> <li>e. a notice that use of tobacco products is not permitted on school property or at any school related function;</li> <li>f. current tuition rate for students;</li> <li>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.</li> </ul>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At the Needham site, items b and c were not available for public view.*

*At the Brookline site, items b., c. and e were not available for public view.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<p><b>4.4</b></p> <p><b>Advanced Notice of Program/Facility Change</b></p> <p><b>28.09(5)(c)</b></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> <ul style="list-style-type: none"> <li>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;</li> <li>b. building changes that affect the care of the students;</li> <li>c. major changes in the population to be served;</li> <li>d. any alteration of the service configuration of the program as last approved by the Department; and</li> <li>e. significant changes in policies or procedures.</li> </ul>
	<p><b>Rating: Implemented</b>                      <b>RESPONSE REQUIRED: No</b></p>

CRITERION NUMBER	
	<b>Legal Standard</b>
<p data-bbox="272 443 310 470"><b>4.5</b></p> <p data-bbox="217 512 365 573"><b>Immediate Notification</b></p> <p data-bbox="233 611 349 638"><b>18.03(10)</b></p> <p data-bbox="233 646 349 674"><b>18.05(7)</b></p> <p data-bbox="233 682 349 709"><b>28.09(12)</b></p>	<p data-bbox="407 443 1409 573">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"> <li data-bbox="407 581 716 609">a. the death of a student</li> <li data-bbox="407 617 1377 709">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</li> <li data-bbox="407 718 1045 745">c. any motor vehicle accident causing student injury</li> <li data-bbox="407 753 1328 810">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</li> <li data-bbox="407 819 1360 846">e. <u>any</u> student injury resulting from a restraint which requires medical attention</li> <li data-bbox="407 854 1349 882">f. whenever any student is administered medication in an emergency situation</li> <li data-bbox="407 890 846 917">g. whenever any student runs away</li> <li data-bbox="407 926 1321 1018">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</li> <li data-bbox="407 1026 1401 1146">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</li> <li data-bbox="407 1155 1377 1274">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</li> <li data-bbox="407 1283 1354 1346">h. any action taken by a federal, state or local agency that might jeopardize the school's approval with DOE</li> <li data-bbox="407 1354 1338 1446">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.</li> </ul>
	<p data-bbox="407 1488 792 1516"><b>Rating: Partially Implemented</b></p> <p data-bbox="922 1488 1349 1516"><b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*Based on a review of documentation and staff interviews, The Walker Home and School, Inc. does not consistently notify 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 required notifications listed above.*

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

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>5.1</b>  <b>Student Admissions</b>  <b>28.09(11)</b>	<p>The private school develops and implements written admissions criteria, policies and procedures that include the following:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>c. a complete and thorough description of the interview process; and</li> <li>d. consent forms.</li> </ul>
	<b>Rating: Partially Implemented</b> <b>RESPONSE REQUIRED: Yes</b>

**Department of Education Findings:**

*At the Needham site, based on a review of student records and staff interviews, copies of the school’s policies and procedures were not provided to the parents and the placing public school district prior to the admission of the student, documentation from a licensed physician of a complete physical examination of the student not more than twelve (12) months prior to admission was not completed consistently and consent forms were not always complete at the time of admission.*

*At the Brookline site, based on a review of student records and staff interviews, copies of the school’s policies and procedures were not provided to the student (if appropriate) parents and the placing public school district prior to the admission of the student, documentation from a licensed physician of a complete physical examination of the student not more than twelve (12) months prior to admission was not completed consistently and consent forms were not found at the time of admission.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p data-bbox="272 380 313 407"><b>5.2</b></p> <p data-bbox="207 447 378 741"><b>Policies and Procedures for Coordination and Collaboration with Public School Districts</b></p> <p data-bbox="212 783 373 909"><b>28.06 (2-3) 28.09(9)(c)&amp;(d) 28.09(2)(b)7</b></p> <p data-bbox="212 951 373 1014"><b>Federal Regulations:</b></p> <p data-bbox="212 1056 373 1140"><b>34 CFR 300.349 and 300.400-401</b></p>	<p data-bbox="407 380 1398 541">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>
	<p data-bbox="407 1161 699 1188"><b>Rating: Commendable</b></p> <p data-bbox="922 1161 1341 1188"><b>RESPONSE REQUIRED: No</b></p>

**Department of Education Findings:**

*At the Needham site, based on staff interviews and a review of documentation, there is a tremendous focus on transitional services for students served at Walker. They are bridging the gap between Walker and the community from where students live by involving students in their area after-school activities, social and recreational activities.*

*At the Brookline site, based on staff interviews and a review of documentation, students have various opportunities to be educated and socialize with students who do not have disabilities. Specifically, by attending Harvard Extension School, attending college classes at a local community college, participating in internships, playing on high school hockey teams and attending Beacon High School part-time while attending the students' local high school part-time.*

<b>CRITERION NUMBER</b>	
<p data-bbox="272 344 313 373"><b>5.3</b></p> <p data-bbox="204 411 380 638"><b>Contents of Coordination and Collaboration with Public School Districts</b></p> <p data-bbox="228 680 355 709"><b>28.06(2-3)</b></p> <p data-bbox="228 716 355 745"><b>28.07(5)</b></p> <p data-bbox="224 751 360 781"><b>28.09(9)(c)</b></p> <p data-bbox="261 787 323 816"><b>&amp;(d)</b></p> <p data-bbox="204 823 380 852"><b>28.09(2)(b)(7)</b></p> <p data-bbox="215 915 368 1010"><b>34 CFR 300.349 and 300.400-401</b></p>	<p data-bbox="808 296 1003 325" style="text-align: center;"><b>Legal Standard</b></p> <p data-bbox="407 344 1406 443">The private school has policies/procedures that describe roles and responsibilities of all staff as well as general communication/coordination/collaboration procedures that address the following:</p> <ul style="list-style-type: none"> <li data-bbox="407 485 1122 514">a. consideration of possible placement, admissions process;</li> <li data-bbox="407 520 1284 575">b. IEP development and implementation and roles in 3-year eligibility re-determinations;</li> <li data-bbox="407 581 1382 636">c. Contents and general arrangements for executing contracts with placing school districts;</li> <li data-bbox="407 642 1365 741">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;</li> <li data-bbox="407 747 748 777">e. Written progress reports;</li> <li data-bbox="407 783 1325 879">f. Documentation regarding student-related developments, including matters involving students' behavioral plans, functional behavioral assessments, manifestation determinations, imposition of discipline, etc.</li> <li data-bbox="407 886 732 915">g. Administration of tests;</li> <li data-bbox="407 921 1406 976">h. Preparations that are made for the student's return to a public school or other less restrictive setting;</li> <li data-bbox="407 982 1357 1079">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;</li> <li data-bbox="407 1085 992 1115">j. school district monitoring of student progress;</li> <li data-bbox="407 1121 1390 1176">k. the granting of "high school diplomas" consistent with Department of Education requirements; and</li> <li data-bbox="407 1182 1349 1245">l. the conditions for the issuance of any "certificates" of attendance or program completion by the private school.</li> </ul>
	<p data-bbox="407 1293 792 1323"><b>Rating: Partially Implemented</b></p> <p data-bbox="927 1293 1349 1323" style="text-align: right;"><b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At both the Needham and Brookline sites, items c. (some contracts were not signed by both parties and/or did not include all required elements), d. (not all team meetings had public school representatives in attendance), and policies for items i., j., k. and l. were not included in the documentation submitted.*

*At the Brookline site, teachers are not always available to participate in team meetings as a result of the inability of the school to provide coverage during these time periods. Transition planning for students does not typically occur at the age of fourteen as required by regulations. Due to the educational and emotional needs of the students, post graduation plans are not discussed and implemented in a timely manner, nor are they individualized to meet the needs of each student at Beacon High School.*

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>5.5</b> <b>Staff</b> <b>Coordinator</b> <b>28.09(7)</b>	A senior person is designated to communicate and work effectively with all public school districts that have placed students in the program.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**AREA 6: EDUCATIONAL PROGRAM REQUIREMENTS -- STUDENT LEARNING TIME**

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>6.1</b>  <b>Daily Instructional Hours</b>  <b>603 CMR 27.00</b>	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
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>6.2</b>  <b>School Days per Year</b>  <b>28.09(9)</b>	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
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>AREA 7: EDUCATIONAL PROGRAM REQUIREMENTS -- CURRICULUM FRAMEWORKS AND STATE ASSESSMENTS</b>
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CRITERION NUMBER	
	<b>Legal Standard</b>
<b>7.1</b>  <b>Curriculum Frameworks</b>  <b>28.09(9)(b)</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 graduation standards.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>7.2</b>  <b>Staff Training</b>  <b>28.09(9)(b)</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.
	<b>Rating: Partially Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: Yes</b></span>

**Department of Education Findings:**

*At the Needham site, based on staff interviews, not all direct care staff have an understanding and knowledge of the general curriculum expectations and learning standards of the Massachusetts Curriculum Frameworks.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>7.3</b>  <b>State/District Wide Assessments</b>  <b>28.09(9)(d)</b>	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.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**AREA 8: EDUCATIONAL PROGRAM REQUIREMENTS -- INDIVIDUALIZED EDUCATION PROGRAMS**

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

**Department of Education Comment:**

*At the Needham site, the individual and group therapy sessions offered to students is varied and is truly individualized to meet the needs of the student. The level system which is followed for all students is incorporated with the point system to encourage students to do their best and also encourages students to work on target behaviors in a positive way.*

*At the Brookline site, students and their families are true partners in the educational programming of the student. Students are involved in developing and refining their IEP and clinical goals and are encouraged to contribute at Team meetings.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<p style="text-align: center;"><b>8.2</b></p> <p><b>Implementa- tion – Related Services</b></p> <p><b>28.04 and 28.09(8)</b></p> <p><b>34 CFR 300.24</b></p>	<p>The private school specifies how each of the following related services is implemented for the described student population of the school:</p> <ol style="list-style-type: none"> <li>a. Transportation</li> <li>b. Braille Needs (blind/visually impaired)</li> <li>c. Assistive Technology Devices/Services</li> <li>d. Communication Needs (all students)</li> <li>e. Communication Needs (deaf/hard of hearing students)</li> <li>f. Language Needs (Limited English Proficient students)</li> <li>g. Physical Therapy</li> <li>h. Occupational Therapy</li> <li>i. Recreation Services</li> <li>j. Mobility/Orientation Training</li> <li>k. Psychological Services, Counseling Services, Rehabilitation Counseling Services, Social Work Services</li> <li>l. Parent Counseling and Training</li> <li>m. School Health Services, Medical Services</li> <li>n. Social Work Services</li> <li>o. Other (music therapy, sensory integration therapy)</li> </ol> <p>(Related services are defined in the federal regulations as those services which are developmental and corrective as well as supportive services that <u>assist a child to benefit from</u> special education and/or access the general curriculum.)</p>
	<p><b>Rating: Commendable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p>

**Department of Education Comment:**

*At the Needham site, the parent involvement and events is extremely comprehensive. Based on interviews with parents, they truly feel part of The Walker team and feel that their input is valued and considered. Of particular note is that fact that a member of the parent advisory group is also a member of the Board of Directors for Walker, which is extremely unique. The library available for student use is one that could be found in a public school of similar size. Residential students are encouraged to use the library on evenings and weekends for school or leisure purposes. The students are able to participate in expressive therapy that, for many students, provides them the opportunity to explore alternative ways of communicating their wants, needs or frustrations in a manner that is meaningful and meets them at their individual level of need. Based on observations students benefit greatly from the various methods of the opportunity for self-expression made available to them.*

*At the Brookline site, students are offered individual and group therapy that is designed to meet their individual needs. The groups offered are theme-based and take into consideration the needs of the students. Based on interviews with parents, they feel that staff at the Brookline site offer an enormous amount of training and support through monthly support groups. Parents feel that they are not alone and have support from the staff and other parents within the program.*



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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>8.6 IEP Implementation 28.09</b>	The private school program implements all services on the students' IEP.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p style="text-align: center;"><b>8.7</b></p> <p><b>IEP- Progress Reports</b></p> <p><b>28.07(3)</b></p> <p><b>20 U.S.C. Chapter 33, Section 1414(d)(1)(A) (viii)</b></p> <p><b>34 CFR 300.347</b></p>	<p>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>Copies of progress reports are maintained in student records, including documentation of persons or agencies receiving such reports.</p>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At both the Needham and Brookline sites, based on a review of student records, the progress reports did not include information on the extent to which such progress is sufficient to enable the child to achieve the goals by the end of the year. Documentation of persons or agencies receiving such reports was not found. It was also difficult to determine in which quarter the progress report was documenting progress.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p data-bbox="199 380 383 611"><b>8.8</b> <b>IEP- Revisions and Changes</b> <b>34 CFR 300</b></p>	<p data-bbox="407 380 1396 474">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="407 516 1396 579">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="407 621 1276 642">In no case does the private school issue a new or revised IEP for a student.</p> <p data-bbox="407 684 1396 842">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="407 863 1349 894"><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At the Needham site, based on a review of student records and staff interviews, Walker has conducted Team meetings without the presence of an administrative representative from the responsible school district.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p data-bbox="199 1369 383 1568"><b>8.9</b> <b>IEP- Less Restrictive Placement</b> <b>28.09(9)(c)</b></p>	<p data-bbox="407 1369 1396 1568">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 or general education classroom, or other community program or a period of transition from one program option to a less restrictive program option.</p>
	<p data-bbox="407 1621 1341 1652"><b>Rating: Implemented</b>                      <b>RESPONSE REQUIRED: No</b></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>8.10</b>  <b>IEP- Transition Planning</b>  <b>34 CFR 300.347(b)(1) 34 CFR 300.347(b)(2)</b>	<p>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>.</p> <p>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.</p>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>8.11</b>  <b>IEP- Transition Services</b>  <b>28.05(4)(c)</b>	<p>For students approaching graduation or the age of twenty-two, the private school's participant on the IEP Team provides sufficient information to the Team to enable the Team to determine whether the student is likely to require continuing services from adult human service agencies.</p> <p>The private school works with the responsible school district to make any necessary referral to the Bureau of Transitional Planning in the Executive Office of Health and Human Services (at least two years prior to the student's 22<sup>nd</sup> birthday) in accordance with the requirements of MGL c.71, §12A-§12C (known as Chapter 688).</p>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>9.1 Policies and Procedures 18.05(5)</b>	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.
	<b>Rating:</b> <b>Needham – Commendable</b> <b>Brookline – Partially Implemented</b>
	<b>RESPONSE REQUIRED:</b> <b>No Yes</b>

**Department of Education Findings:**

*At the Needham site, based on a review of documentation and staff interviews, the policies and procedures dealing with discipline and behavior management are extremely thorough and individualized to meet the needs of the student. The various aspects of these procedures include a level system, an incentive program, a point system and an individual crisis management plan for each student.*

*At the Brookline site, based on a review of documentation and staff interviews, the policies and procedures dealing with discipline and behavior management need to be more specific and a policy that meets all federal and state special education requirements pertaining to the use of restraints needs to be developed and implemented.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>9.2 Discipline Code IDEA-97</b>	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.
	<b>Rating: Implemented</b>
	<b>RESPONSE REQUIRED:</b> <b>No</b>

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>9.3</b>  <b>Runaway Students</b>  <b>18.03(10)</b>	<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>
	<p><b>Rating:</b></p> <p><b>Needham - Partially Implemented                      RESPONSE REQUIRED:      Yes</b></p> <p><b>Brookline – Not Implemented</b></p>

**Department of Education Findings:**

*At the Needham site, staff interviews revealed that not all staff are aware of the definition or policy of a runaway student.*

*At the Brookline site, based on a review of documentation, a policy on runaway students needs to be developed and implemented.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>9.4</b>  <b>Restraints</b>  <b>18.05 (5)(h)</b>  <b>603 CMR 46.00</b>  <b>102 CMR 3.00</b>	<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>
	<p><b>Rating:</b></p> <p><b>Needham – Implemented                                      RESPONSE REQUIRED:      No</b></p> <p><b>Brookline – Not Implemented                                      Yes</b></p>

**Department of Education Findings:**

*At the Brookline site, based on a review of documentation and staff interviews, a policy on the use of physical restraint needs to be developed and the staff at Beacon High need to administer physical restraints in accordance with the requirements of 603 CMR 46.00.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<p style="text-align: center;"><b>9.5</b></p> <p style="text-align: center;"><b>3-5 Day Suspensions</b></p> <p style="text-align: center;"><b>18.05(6)</b></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"> <li>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.</li> <li>b. No student may be suspended and sent home unless a responsible adult is available to receive the student.</li> <li>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.</li> <li>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).</li> </ol> <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><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At both the Needham and Brookline sites, based on a review of documentation the policy for 3-5 day suspensions does not include items a. and d. listed above.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<p style="text-align: center;"><b>9.6</b></p> <p style="text-align: center;"><b>10+ Day Suspensions</b></p> <p style="text-align: center;"><b>Joint responsibilities</b></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"> <li>a. A request is made of the student's responsible school district to convene an IEP Team meeting, which includes representation from the private school, prior to a suspension that constitutes a change in placement of a student with disabilities;</li> <li>b. The private school participates in the Team meeting: <ol style="list-style-type: none"> <li>(1) to develop or review a functional behavioral assessment of the student’s behavior and to develop or modify a behavior intervention plan;</li> <li>(2) to identify appropriate alternative educational setting(s); and</li> </ol> </li> </ol>



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<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><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At both the Needham and Brookline sites, based on a review of documentation the policy for terminations does not include items c. and d. listed above.*

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p><b>10.1</b></p> <p><b>Student: Teacher Ratios</b></p> <p><b>28.06(6)(d)&amp; (g)</b> <b>28.09(7)(e)</b></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><b>Rating: Implemented</b>                                      <b>RESPONSE REQUIRED: No</b></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>10.2 Age Range</b>	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).
<b>28.06(6)(f)</b>	(NOTE: No waiver of this requirement can be approved by the Department of Education.)
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>10.3 Programs for Young Children</b>	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.
<b>28.09(7)(e) 28.06(7)</b>	
	<b>Rating: Not Applicable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**Department of Education Comment:**

*The Walker Home and School, Inc. does not serve students ages 3 and 4 years old in the Department of Education approved programs.*

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

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>10.5</b>  <b>Alternative Ratios</b>  <b>18.03(2)</b>	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.
	<b>Rating: Not Applicable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**Department of Education Comment:**

*The Walker Home and School, Inc. has not requested alternative ratios for student to childcare workers.*

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

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	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. <u>For applicants or employees who reside outside of Massachusetts,</u> 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.]
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.2</b> <b>Administrative Responsibility</b> <b>18.05(11)(a)</b>	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.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.3</b> <b>Educational Administrator Qualifications</b> <b>28.09(7)(a)</b> <b>603 CMR 44.00 and 44.04</b>	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: a. certification as a special educator; b. a minimum of a master's degree in special education or a related field; and c. a minimum of one year of administrative experience.  The educational administrator has been re-certified pursuant to the requirements of 603 CMR 44.00. The educational administrator has obtained supervisor approval of his/her Professional Development Plan per 603 CMR 44.04.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

CRITERION NUMBER	
	<b>Legal Standard</b>
<p data-bbox="266 415 321 443"><b>11.4</b></p> <p data-bbox="207 478 378 674"><b>Special Education Teachers and Regular Education Teachers</b></p> <p data-bbox="207 716 378 779"><b>28.09(7)(b)(c)</b> <b>18.05(11)(f)</b></p>	<p data-bbox="407 415 1403 541">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> <ol data-bbox="407 558 1403 1010" style="list-style-type: none"> <li>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> <li>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> <li>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> <li>d. To the extent that teaching staff is providing special education services, such services are provided, designed, or supervised by a special educator.</li> </ol>
	<p data-bbox="407 1066 675 1094"><b>Rating: Implemented</b></p> <p data-bbox="922 1066 1341 1094" style="text-align: right;"><b>RESPONSE REQUIRED: No</b></p>

CRITERION NUMBER	
	<b>Legal Standard</b>
<p data-bbox="266 1371 321 1398"><b>11.5</b></p> <p data-bbox="207 1455 378 1518"><b>Related Services Staff</b></p> <p data-bbox="224 1560 362 1602"><b>28.09(7)(d)</b></p>	<p data-bbox="407 1371 1386 1465">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 data-bbox="407 1652 675 1680"><b>Rating: Implemented</b></p> <p data-bbox="922 1652 1341 1680" style="text-align: right;"><b>RESPONSE REQUIRED: No</b></p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.6</b> <b>Master Staff Roster</b>  <b>28.09(7)</b>	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).
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.9</b> <b>Organizational Structure</b>  <b>28.09(7)</b> <b>28.07(c)</b>	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.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.10</b> <b>Supervision of Child Care Workers (Direct Care Staff)</b>  <b>18.03(4)</b>	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.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.11</b>  <b>Supervision of Students</b>  <b>28.09(7)</b> <b>18.03(1)</b>	<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>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.12</b>  <b>Plan for Staff Coverage</b>  <b>18.03(1)(b)4</b>	<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>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**AREA 12: EDUCATIONAL STAFFING REQUIREMENTS -- STAFF TRAINING**

CRITERION NUMBER	Legal Standard
<p style="text-align: center;"><b>12.1</b></p> <p style="text-align: center;"><b>Staff Orientation Training</b></p> <p><b>18.05(11)(g)</b></p>	<p>The private special education program develops a written plan for staff orientation and provides an orientation-training program for all new staff to ensure an understanding of the school’s philosophy, organization, program, practices and goals.</p> <p>The written plan shall describe how newly hired staff are provided training on all required topics at the time of hire if the required topics have already been covered with existing staff.</p> <p>New staff are not be assigned direct care duties with students until they have participated in all mandated training through their orientation program.</p>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*Please refer to criterion 12.2.*

CRITERION NUMBER	Legal Standard
<p style="text-align: center;"><b>12.2</b></p> <p style="text-align: center;"><b>Annual In-Service Training Plan and Calendar</b></p> <p><b>28.09(7)(f)</b></p> <p><b>18.05(11)(h)</b></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> <p>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.)</p> <p>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</p>

CRITERION NUMBER	
	Legal Standard
	<p>(c), below.)</p> <ul style="list-style-type: none"> <li>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.)</li> <li>d. Transportation safety (if applicable)</li> <li>e. Student record policies and confidentiality issues (See also, 12.2 (e), below.)</li> <li>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.)</li> <li>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))</li> <li>h. Restraint procedures including de-escalation methods used by the program (See also, 9.4 above.)</li> <li>i. Curriculum alignment with the Massachusetts Curriculum Frameworks,</li> <li>j. Procedures for inclusion of all students in MCAS testing and/or alternate assessments; and</li> <li>k. Civil rights responsibilities</li> </ul>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At the Needham site, based on staff interviews, not all staff receive in-service training annually on topics a., c., d., i., and j (for residential staff) listed above.*

*At the Brookline site, based on staff interviews, not all staff receive in-service training annually on topics a., b., c., d., g., and h listed above.*

CRITERION NUMBER	
	Legal Standard
<p><b>12.2 (a)</b></p> <p><b>Behavior Management and Restraint Training</b></p> <p><b>28.09(11)</b></p> <p><b>18.05(5)</b></p>	<p>Training of Behavior Management and Suspension and Termination procedures includes:</p> <ul style="list-style-type: none"> <li>a. Program’s student conduct/discipline code;</li> <li>b. Description of safeguards for students’ emotional, physical, and psychological well-being;</li> <li>c. Policies on use of time-out procedures;</li> <li>d. Techniques for dealing with disruptive and violent behavior including skill training on the proper use of non-violent restraint.</li> <li>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;</li> </ul> <p>(NOTE: OCCS residential regulations on behavior management, including</p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>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.)</p> <p>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.</p> <p>g. Procedures for obtaining parental consent, if appropriate.</p>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At the Needham site, based on a review of documentation and staff interviews, there are no 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 nor are there annual procedures for obtaining parental consent to implement restraints.*

*At the Brookline site, based on a review of documentation and staff interviews, there are no procedures for dealing with disruptive and violent behavior including skill training on the proper use of non-violent restraint. Additionally, there are no detailed procedures pertaining to the use of any type of restraint, which must meet or exceed any requirements in applicable state regulations or policy, 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 nor are there annual procedures for obtaining parental consent to implement restraints.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p><b>12.2 (b)</b> <b>Child Abuse Reporting</b> <b>18.05(9)(j)</b></p>	<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>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At both the Needham and Brookline sites, based on staff interviews, not all staff have received training on reporting suspected child abuse/neglect to the Department of Social Services and/or the Disabled Persons Protection Commission.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2 (c)</b> <b>Emergency First Aid Training and CPR Certification</b> <b>18.05(9)(e)</b>	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.
	<b>Rating: Partially Implemented</b> <b>RESPONSE REQUIRED: Yes</b>

**Department of Education Findings:**

*At the Brookline site, based on staff interviews, not all direct care staff maintain appropriate CPR certification.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2 (d)</b> <b>Medication Training</b> <b>18.05(9)(f)(3)(c)</b>	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.
	<b>Rating: Partially Implemented</b> <b>RESPONSE REQUIRED: Yes</b>

**Department of Education Findings:**

*At both the Needham and Brookline sites, based on staff interviews, not all staff providing direct care and instruction to students who receive medication, receive training that includes the nature of the medication, potential side effects and any special precautions or requirements.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2 (e)</b>  <b>Student Record Training</b>  <b>28.09(10)</b>	<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>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2 (f)</b>  <b>Emergency Procedures Training</b>  <b>18.05(10)</b>	<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"> <li>a. help all students to understand the nature of the drills</li> <li>b. make special provisions for the evacuation of any mobility-impaired student in the facility</li> <li>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.</li> </ol>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2 (g)</b> <b>Interns and Volunteers Training</b> <b>18.05 (11)(I)</b>	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.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2(h)</b> <b>Child Care Staff Development and Training</b> <b>18.03(3)</b>	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.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2 (i)</b> <b>Staff Evaluations</b> <b>18.05(11)(c)1.</b>	Written performance evaluations are maintained on all staff. Personnel are evaluated annually.
	<b>Rating: Partially Implemented</b> <b>RESPONSE REQUIRED: Yes</b>

**Department of Education Findings:**

*At both the Needham and Brookline sites, a review of personnel files and staff interviews revealed that written performance evaluations are not maintained on all staff and that not all personnel are evaluated annually.*

**AREA 13: PHYSICAL FACILITY AND EQUIPMENT REQUIREMENTS**

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>13.1</b>  <b>Educational Facilities and Materials</b>  <b>29.09(8)</b>	<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><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At the Brookline site, based on observations and staff interviews, the technology available for students needs to be updated to include additional computer access and internet access.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>13.3</b>  <b>Physical Facility/ Architectural Barriers</b>  <b>18.04(8)</b>	<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><b>Rating: Implemented</b>                                      <b>RESPONSE REQUIRED: No</b></p>

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

CRITERION NUMBER	
	<b>Legal Standard</b>
<p style="text-align: center;"><b>13.5</b></p> <p><b>Classroom Space</b></p> <p style="text-align: center;"><b>18.04(6)(a)</b></p>	<p>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.</p>
	<p><b>Rating:</b></p> <p><b>Needham – Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p> <p><b>Brookline – Partially Implemented</b> <span style="float: right;"><b>Yes</b></span></p>

**Department of Education Findings:**

*At the Brookline site, based on classroom observations, there are noise distractions from other classrooms. For example, when observing a history class, the music class from the very next classroom was extremely distracting. In general, the classrooms are small in size and the majority of classrooms do not allow the appropriate number of students to participate in educational activities due to the limited space for students.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>13.6</b> <b>Library/ Resource Room</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.
<b>18.04(6)(b)</b>	<b>Rating:</b> <b>Needham – Commendable</b> <b>Brookline – Partially Implemented</b>
	<b>RESPONSE REQUIRED: No</b> <b>Yes</b>

**Department of Education Findings:**

*At the Needham site, based on observations, the library available for student use is comprehensive and contains a variety of materials appropriate to the age and abilities of the students at Walker. There is a part-time librarian who keeps the library organized and functioning like one that would be found in the community. On nights and weekends, residential students are able to access the library for educational and leisure activities.*

*At the Brookline site, based on observations, the library available for student use is small and contains outdated and limited materials. Although there are numerous resources available for students throughout Beacon High School, they are located in individual classrooms, which limits access for all students enrolled.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>13.7</b> <b>Indoor Space</b>	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.
<b>18.04(7)(a)</b>	Additionally, the program: <ul style="list-style-type: none"> <li>a. ensures that all areas, including but not limited to, floors, ceilings and walls, are clean, well maintained and free from safety hazards;</li> <li>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;</li> <li>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</li> <li>d. designates space separate from classroom areas for administrative duties and staff or parent conferences.</li> </ul>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>13.8</b>  <b>Outdoor Space</b>  <b>18.04(7)(b)</b>	<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>
	<b>Rating: Needham – Implemented</b> <b>Brookline – Not Implemented</b> <b>RESPONSE REQUIRED: No</b> <b>Yes</b>

**Department of Education Findings:**

*At the Brookline site, the school does not have an outdoor play area of at least seventy-five square feet per student using it at any one time.*

**AREA 14: REQUIREMENTS FOR DAILY CARE**

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>14.2</b>  <b>Food and Nutrition</b>  <b>18.03(7)</b>	<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>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>14.3</b>  <b>Toileting Procedures and Individual Plans</b>  <b>18.03(8)</b>	<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>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**AREA 15: PARENT AND STUDENT INVOLVEMENT**

<b>CRITERION NUMBER</b>							
	<b>Legal Standard</b>						
<b>15.1</b>  <b>Parental Involvement and Parents' Advisory Group</b>  <b>18.05(4)(a)</b>	<p>The private special education program has developed a written plan for involving parents. The private school has a Parents' Advisory Group that advises the group on matters that pertain to the education, health and safety of the students in the program.</p> <p>The program has designated a staff person to support the Parents' Advisory Group.</p>						
	<p><b>Rating:</b></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><b>Needham – Commendable</b></td> <td style="width: 30%; text-align: center;"><b>RESPONSE REQUIRED:</b></td> <td style="width: 20%; text-align: right;"><b>No</b></td> </tr> <tr> <td><b>Brookline – Partially Implemented</b></td> <td></td> <td style="text-align: right;"><b>Yes</b></td> </tr> </table>	<b>Needham – Commendable</b>	<b>RESPONSE REQUIRED:</b>	<b>No</b>	<b>Brookline – Partially Implemented</b>		<b>Yes</b>
<b>Needham – Commendable</b>	<b>RESPONSE REQUIRED:</b>	<b>No</b>					
<b>Brookline – Partially Implemented</b>		<b>Yes</b>					

**Department of Education Findings:**

*At the Needham site, based on a review of documentation, staff interviews and parent interviews, there is a very involved Parents' Advisory Group. So that all parents may attend the monthly meetings, transportation and child care is offered on nights of Parent Advisory Group meetings. The Parents' Advisory Group has a member who is a liaison to the Board of Directors for The Walker Home & School, Inc. In addition to advising the school on the education, health and safety of the students, the Parents' Advisory Group is offered numerous trainings by staff at Walker, regarding areas that are usually requested by the parents.*

*At the Brookline site, based on a review of documentation, staff interviews and parent interviews, although there is a monthly support group that has a high percentage of parent participation, there is not a Parents' Advisory Group that advises Beacon High School on the education, health and safety of the students in the program. In addition, although Beacon High School has Social Workers rotate attendance at the meetings from month to month, there is not a designated staff person to support the Parents' Advisory Group.*



CRITERION NUMBER	
	<b>Legal Standard</b>
<p data-bbox="266 380 318 407"><b>15.4</b></p> <p data-bbox="241 447 342 506"><b>Parent Consent</b></p> <p data-bbox="222 548 362 575"><b>28.07(1)(b)</b></p>	<p data-bbox="407 380 1393 506">The private school program notifies the placing school district when multiple efforts have been made, yet have failed to involve the parent and obtain necessary parental consent. Matters requiring parental consent include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li data-bbox="407 548 1256 575">a. in coordination with responsible school districts, IEP-related matters</li> <li data-bbox="407 581 743 609">b. Emergency medical care</li> <li data-bbox="407 615 602 642">c. Medications</li> <li data-bbox="407 648 574 676">d. Restraints</li> <li data-bbox="407 682 812 709">e. Publicity, research, evaluation</li> <li data-bbox="407 716 586 743">f. Field Trips</li> <li data-bbox="407 749 1377 842">g. in coordination with responsible school districts, the Parental Notification Law pursuant to Chapter 71, Section 32A concerning curriculum that primarily involves human sexual education or human sexuality issues</li> </ul>
	<p data-bbox="407 863 1349 890"><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At the Needham site, based on a review of student records, consents listed in a., d., and g. above were not consistently found in student records.*

*At the Brookline site, based on a review of student records, consents listed in a., b., c., d., e., f., and g. above were not consistently found in student records.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<p data-bbox="266 1404 318 1432"><b>15.5</b></p> <p data-bbox="212 1472 371 1530"><b>Student Involvement</b></p> <p data-bbox="241 1572 342 1631"><b>34 CFR 300.344</b></p>	<p data-bbox="407 1404 1385 1530">The private school program collaborates with the placing school district to ensure student participation in Team meetings where required by law and if appropriate. If the student does not attend the IEP meeting, steps are taken to ensure that the student’s preferences and interests are considered.</p>
	<p data-bbox="407 1688 1341 1715"><b>Rating: Implemented</b>                      <b>RESPONSE REQUIRED: No</b></p>

CRITERION NUMBER		
	Legal Standard	
<p><b>15.6</b></p> <p><b>Consent at Age of Majority</b></p> <p><b>28.07(5)</b></p>	<p>One year prior to the student’s reaching age eighteen, the program works collaboratively with the responsible school district to ensure consent is obtained from the student to continue the special education program upon turning age eighteen, or to ensure that another mechanism is in place to obtain consent, i.e.:</p> <ul style="list-style-type: none"> <li>a. the parent or other legally eligible party has petitioned and been appointed guardian by a court of competent jurisdiction;</li> <li>b. the student chooses to share decision-making with his or her parent;</li> <li>c. the student chooses to delegate continued decision-making to his or her parent or other willing adult.</li> </ul> <p>(See also Criterion 15.3.)</p>	
	<p><b>Rating:</b></p> <p><b>Needham – Not Applicable</b></p> <p><b>Brookline – Partially Implemented</b></p>	<p><b>RESPONSE REQUIRED:</b></p> <p><b>No</b></p> <p><b>Yes</b></p>

**Department of Education Findings:**

*At the Needham site, the oldest students are 15 years old.*

*At the Brookline site, based on a review of documentation, a review of student records and parent interviews, a procedure regarding consent at the age of majority needs to be developed and implemented.*

CRITERION NUMBER		
	Legal Standard	
<p><b>15.7</b></p> <p><b>Registering Complaints</b></p> <p><b>18.05(1)(b)16</b></p>	<p>The private special education program has developed and made available to parents and students written procedures that may be used to register complaints regarding the student’s education and care at the facility.</p>	
	<p><b>Rating: Implemented</b></p>	<p><b>RESPONSE REQUIRED: No</b></p>

**AREA 16: HEALTH AND MEDICAL SERVICES**

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p style="text-align: center;"><b>16.2</b></p> <p><b>Physician Consultation</b></p> <p><b>18.05(9)(a)</b></p>	<p>The school has secured the services of a licensed physician available for consultation.</p>
	<p><b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p>

CRITERION NUMBER			
	Legal Standard		
<b>16.3</b>  <b>Nursing</b>  <b>18.05(9)(b)</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.)		
	<b>Rating:</b> <b>Needham – Implemented</b> <b>Brookline – Not Implemented</b>	<b>RESPONSE REQUIRED:</b>	<b>No</b> <b>Yes</b>

**Department of Education Findings:**

*At the Brookline site, based on a review of documentation and staff interviews, Beacon High School does not have the services of a registered nurse that meets the needs of the students enrolled.*

CRITERION NUMBER			
	Legal Standard		
<b>16.4</b>  <b>Emergency First Aid</b>  <b>18.05(9)(e)</b>	The school has developed written policies and procedures for emergency first aid and care including: 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.		
	<b>Rating: Partially Implemented</b>	<b>RESPONSE REQUIRED:</b>	<b>Yes</b>

**Department of Education Findings:**

*At the Needham site, based on a review of documentation and observations, items c. d. and h. listed above are not part of the written policies and procedures.*

*At the Brookline site, based on a review of documentation and observations, items c. d. and h. listed above are not part of the written policies and procedures.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<p style="text-align: center;"><b>16.5</b></p> <p><b>Administra- tion of Medication</b></p> <p style="text-align: center;"><b>18.05(9)(f)</b></p>	<p>The school has developed and implements written policies and procedures regarding the administration of medication including, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>a. no medication is administered to a student without written authorization from a parent. Such authorization shall be renewed annually;</li> <li>b. no prescription medication shall be administered to a student without the written order of the physician prescribing the medication to that student;</li> <li>c. the school maintains written policies and procedures regarding prescriptions and administrations of medication including authorization, prepackaging and staff training;</li> <li>d. any change of medication or dosage must be authorized by a new order from a physician;</li> <li>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> <li>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> <li>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> <li>h. a review of medications administered to a student shall be incorporated into all progress reviews conducted for the student.</li> </ul>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED:    Yes</b></p>

**Department of Education Findings:**

*At both the Needham and Brookline sites, based on a review of documentation and staff interviews, the policy on the administration of medication does not include the following as outlined in bold:*

- 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; the policy states, **“In accordance with the label.”***
- c. the school maintains written policies and procedures regarding prescriptions and administrations of medication including authorization, **prepackaging and staff training;***
- 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.*

*At the Brookline site, based on a review of documentation, the policy on the administration of medications does not include specifics regarding students who self-medicate, including how the medication is stored, where the medication is stored and the supervision of students taking such medication.*

CRITERION NUMBER	
	Legal Standard
<p><b>16.6</b></p> <p><b>Administra- tion of Antipsychotic Medication</b></p> <p><b>18.05(9)(f)(9)</b></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"> <li>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> <li>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> <li>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;</li> <li>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;</li> <li>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.</li> <li>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).</li> <li>d. 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.</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<b>Rating: Partially Implemented</b> <b>RESPONSE REQUIRED: Yes</b>

**Department of Education Findings:**

*At both the Needham and Brookline sites, based on a review of documentation, the policy needs to include items a., b., c., e., f. and g. listed above.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<p style="text-align: center;"><b>16.7</b></p> <p><b>Preventive Health Care</b></p> <p><b>18.05(9)(f)(9)(h)</b></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"> <li>a. provision for each student to receive an annual comprehensive medical and dental examination;</li> <li>b. vision, hearing, postural and other required screening are conducted in accordance with M.G.L. c.71 s.57;</li> <li>c. ensuring that all students have necessary immunizations as required by the Department of Public Health;</li> <li>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;</li> <li>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.);</li> <li>f. provision of family planning information, subject to any applicable state or federal legislation; and</li> <li>g. protecting a student from exposure to foods, chemicals, or other materials to which they are allergic.</li> </ul>
	<b>Rating: Partially Implemented</b> <b>RESPONSE REQUIRED: Yes</b>

**Department of Education Findings:**

*At both the Needham and Brookline sites, based on a review of documentation, the policy needs to include items d., e. and f. listed above.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<p data-bbox="224 380 358 579"><b>16.8 Receipt of Medical Treatment- Religious Beliefs</b></p> <p data-bbox="224 632 358 663"><b>18.05(9)(k)</b></p>	<p data-bbox="407 380 1398 506">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 data-bbox="407 684 1341 716"><b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p>

<b>AREA 17: TRANSPORTATION SAFETY</b>
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CRITERION NUMBER	
	<b>Legal Standard</b>
<p data-bbox="224 1199 358 1325"><b>17.1 Transporta- tion Safety</b></p> <p data-bbox="224 1367 358 1398"><b>28.09(11)(b)</b></p>	<p data-bbox="407 1199 1341 1325">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 data-bbox="407 1367 1341 1430">In the event of a motor vehicle accident, parents, school districts, human service agencies, and the Department of Education are notified immediately.</p> <p data-bbox="407 1472 1406 1598">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 data-bbox="407 1598 1349 1713"><b>Rating:</b> Needham – Implemented <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span> Brookline – Partially Implemented <span style="float: right;"><b>Yes</b></span></p>

**Department of Education Findings:**

*At the Brookline site, based on staff interviews, not all staff have received in-service training on overall transportation safety and the individual needs of the students they transport.*

**AREA 18: STUDENT RECORDS**

CRITERION NUMBER	Legal Standard
<b>18.1</b>  <b>Student Records</b>  <b>28.09(10)</b>	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.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

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

CRITERION NUMBER	
	<b>Legal Standard</b>
	<ul style="list-style-type: none"> <li>• Primary language of parents/guardian</li> <li>• Contact information of persons other than parents to be contacted in an emergency (names, addresses, telephone numbers)</li> <li>• Educational surrogate contact information (if applicable)</li> <li>• Date of last complete physical health examination by physician</li> <li>• Notation of allergies and/or any other medical condition affecting student's well-being, e.g., seizures</li> <li>• Medications</li> <li>• Information specific to this student re handling of medical emergencies</li> </ul> <p>c. copy of IEP;</p> <p>d. copies of quarterly progress reports and any modification of the IEP;</p> <p>e. copy of the student's termination or discharge plan;</p> <p>f. health records, including reports, documentation of physical examinations, allergies, screening tests, results of medical care;</p> <p>g. all evaluations or assessments conducted of the student;</p> <p>h. pertinent correspondence concerning the student;</p> <p>i. information regarding the use of behavior management interventions including, but not limited to, restraint (chemical, mechanical, physical) and time-out procedures; and</p> <p>j. copies of all incident reports.</p>
	<p><b>Rating: Partially Implemented</b>                      <b>RESPONSE REQUIRED: Yes</b></p>

**Department of Education Findings:**

*At the Needham site, based on a review of student records and staff interviews, the following information was not consistently included in the student records*

*b. face sheets with the following information:*

- *recent picture*
- *primary language of the parents*
- *Within the student record policy, please clarify the procedures staff must follow if a parent/guardian or public school system representative requested access or copies of a students' record.*

*At the Brookline site, based on a review of student records and staff interviews, the following information was not consistently included in the student records:*

*b. face sheets with the following information:*

- *Recent picture*
- *Name of educational case manager*
- *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*
- *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]*

- *Primary language of parents/guardian*
  - *Date of last complete physical health examination by physician*
  - *Medications*
  - *Information specific to this student re handling of medical emergencies*
- e. copy of the student's termination or discharge plan;*
- f. health records, including reports, documentation of physical examinations, allergies, screening tests, results of medical care;*
- i. information regarding the use of behavior management interventions including, but not limited to, restraint (chemical, mechanical, physical) and time-out procedures; and*
- j. copies of all incident reports.*

PRIVATE SCHOOL PROGRAM REVIEW REPORT 2003doc

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Prepared by: NMM, CNG