



# **The Commonwealth of Massachusetts Department of Education**

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350 Main Street, Malden, Massachusetts 02148-5023

Telephone: (781) 338-3700  
TTY: N.E.T. Relay 1-800-439-2370

September 13, 2004

Linda Corwin  
Executive Director  
Castle School 298 Harvard Street  
Cambridge, MA 02139

Re: Onsite Follow-up Monitoring Report: Castle School  
Program Review Corrective Action Plan Verification and  
Mid-cycle Review

Dear Ms. Corwin:

Enclosed is the Department's Program Review Follow-up Monitoring Report together with findings regarding your private school's Mid-Cycle Program Review. This report contains the Department's findings based on the onsite activities conducted in your school to verify the implementation status and effectiveness of corrective steps taken in response to your Program Review Report issued on March 8, 2002. This report also includes a report on the status of implementation for new state or federal special education requirements enacted since your school's last Program Review.

While the Department of Education found all of the noncompliance issues to be resolved, new issues were identified by the Department's onsite team. Therefore, the Department is issuing a "Provisional Approval" status effective from the date of this letter and indicated on your approval certificate. Your "Provisional Approval" will expire on December 10, 2004. The reasons for the "Provisional Approval" are clearly indicated on the attached Corrective Action Plan Implementation Checklist.

Please provide the Department with your written assurance that the Department's requirements for corrective action will be implemented by your private school within the timelines specified. Your statement of assurance must be submitted to the Department's Onsite Chairperson by September 27, 2004. The private school must demonstrate the specific steps to be taken to come into substantial compliance with all identified areas requiring corrective action by October 20, 2004.

Your staff's cooperation throughout these follow-up monitoring activities is appreciated. Should you require additional clarification of information included in our report, please do not hesitate to contact Suzanne Conrad at 781-338-3739.

Sincerely,

Suzanne Conrad, Program Review Follow-up Chairperson  
Program Quality Assurance Services

John D. Stager, Administrator  
Program Quality Assurance Services

c: David P. Driscoll, Commissioner of Education

Encl.: Follow-up Monitoring Report

**MASSACHUSETTS DEPARTMENT OF EDUCATION  
PROGRAM REVIEW**

**Castle School**

**ONSITE VERIFICATION OF CORRECTIVE ACTION PLAN IMPLEMENTATION  
AND/OR IDENTIFICATION OF ADDITIONAL FINDINGS REQUIRING CORRECTIVE ACTION**

**Action Plan Submitted on April 23, 2002  
Onsite Visit Conducted on August 12 & August 13, 2004  
Date of this Report September 13, 2004**

<b>Criterion Number and Topic</b>	<b>Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u></b>	<b>Method(s) of Verification</b>	<b>Comments Regarding Corrective Action Plan Implementation</b>	<b>Corrective Action Plan Determined to be <u>Not Fully Implemented</u> or <u>Additional Issues Identified</u></b>	<b>Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance</b>	<b>Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting</b>
<b>1.3</b> Program's Curriculum 28.09(9)	✓	Documentation Review and Observations	Castle School has provided the Department with a description of the program's curriculum and staff qualifications.			
<b>2.2</b> Approvals, Licenses, Certificates of Inspection 28.09 (2)(b)4-5 28.09(5)		Documentation Review		✓	Castle Schools needs an updated Asbestos report and PCB report.	By October 15, 2004, the program will submit these documents.

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28.09(6) 18.04(1)  102 CMR 3.06 (4)(b)	✓			✓		
<b>2.3</b> OCCS Licensure (Not Applicable to Day Schools)	✓	Documentation Review	Castle School has a current full license from the Office of Child Care Services.			
<b>4.4</b> Advanced Notice of Program/ Facility Change 28.09(5)(c)		Documentation Review, and interview		✓	Castle School needs to be more fully aware of what constitutes a substantial change to the program. The school hired a psychiatrist on a trial basis to monitor all students' medications and treatment and did not notify the Department.	By October 15, 2004, the Program Director will provide assurance she is aware of all Form 1 requirements.
<b>4.5</b> Immediate Notification		Documentation Review, and			Castle School does an excellent job of notifying	By October 15, 2004, the program will provide evidence

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18.03(10) 18.05(7) 28.09(12)	√	Interview		√	the Department of most serious incidents required on Form 2; however, it needs to have a better understanding of “other serious incidents” that need Department notification.	that all staff have been trained and are knowledgeable about “other serious incidents” needing to be reported on Form 2.
<b>5.3</b> Contents of Coordination and Collaboration with Public School Districts 28.06(2-3) 28.07(5) 28.09(9)(c)&(d) 28.09(2)(b)7  Federal Regulations: 300.349	√	Documentation Review, and Interviews	Castle School has policies/procedures that describe the roles and responsibilities of all staff regarding the coordination and collaboration with public school districts.			

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and 300.400-401	✓			✓		
<b>6.1</b> Daily Instructional Hours 603 C.M.R. 27.00	✓	Documentation Review and Observations	Castle School provides the required average annual minimum for its secondary students.			
<b>6.2</b> School Days per Year 28.09(9)	✓	Documentation Review	Castle School provides 216 days of school for its 12-month program.			
<b>7.1</b> Curriculum Frameworks 28.09(9)(b)	✓	Documentation Review and Observations	Castle School personnel reflect a full understanding of the connection between the Massachusetts Curriculum Frameworks and the expectations of the state for student performance.			
<b>8.2</b> Implementation-Related Services		Documentation Review and interview			Castle School temporarily hired a part-time psychiatrist to monitor	By October 15, 2004, the program must submit a plan ensuring that all students are

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28.04 and 28.09(8)	✓			✓	student medication. The psychiatrist is no longer available and Castle School is not budgeted to receive this related service. This related service is critical to the population served.	receiving appropriate psychiatric services.
<b>8.4 Current IEP &amp; Student Roster 28.09</b>	✓	Documentation Review and student record review	Castle School has a current IEP for each of its enrolled students.			
<b>8.6 IEP Implementation</b>	✓	Documentation Review	Castle School implements all services on the students' IEP's.			
<b>8.7 IEP – Progress Reports 28.07(3)</b>	✓	Documentation Review and student record review	Castle School sends copies, at least quarterly, of education progress reports to parents and the public schools.			
<b>8.9</b>						

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IEP- Less Restrictive Placement 28.09(9(c))	√	Documentation Review, and Interviews	Castle School has a plan for ensuring that there are procedures in place that maximize opportunities for enrolled students to gain the capacity to return to a less restrictive educational program.	√		
<b>9.3</b> Runaway Students	√	Documentation Review	Castle School has a appropriate policy for handling runaways.			
<b>9.5</b> 3-5 Day Suspensions 18.05(6)	√	Documentation Review	Castle School, upon admission, provides a suspension policy to parents, the school district and human service agencies that includes all the mandated criteria.			
<b>9.6</b> 10+ Day Suspensions	√	Documentation Review	Castle School implements a ten-day suspension policy that complies with all of the mandates in this criterion.			
<b>10.1</b> Student:Teacher	√	Documentation	Castle School's instructional			

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Ratios 28.06(6)(d)&(g) 28.09(7)(e)	√	Review, and Observations	grouping is within the required mandate.			
<b>10.4</b> Student: Child Care Ratios 28.09(7) 18.01(2)	√	Documentation Review and Observations	Castle School's child care worker ratio is within the required mandate.			
<b>11.1</b> Personnel Policies 28.09(7) 28.09(11)(a) 18.05(11)	√	Documentation Review	Castle School has developed personnel policies that include all required criteria.			
<b>11.3</b> Educational Administrator Qualifications 28.09(7)(a)	√	Documentation Review and interview		√	Castle School has been unable to hire an Educational Administrator to replace its recently retired administrator.	By October 15, 2004, the program must ensure that an Educational Administrator is hired.
<b>11.4</b> Teachers	√	Personnel	Castle School teaching staff			

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<b>Special Education Teachers and Regular Education Teachers</b> <b>28.09(7)(b)(c)</b> <b>18.05(11)(f)</b>	✓	Records, and Documentation Review	have the appropriate teaching license or waiver to meet the needs of the population.	✓		
<b>11.5 Related Services Staff</b> <b>28.09(7)(d)</b>	✓	Personnel Records, and Documentation Review	All related services staff are appropriately certified.			
<b>11.6 Master Staff Roster</b> <b>28.09(7)</b>	✓	Documentation Review	Castle School maintains a master list of all staff.			
<b>11.9 Organizational Structure</b> <b>28.09(7)</b> <b>28.07(c)</b>	✓	Documentation Review, Interviews, and Observations	Castle School's organizational structure provides for the efficient and effective operation of the			

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	√	Observations		√		
<b>11.11</b> Supervision of Students 28.09(7) 18.03(1)	√	Documentation Review, Interviews, and Observations	Castle School has developed a plan for the appropriate supervision of the students.			
<b>12.2</b> <b>Annual In-Service Training Plan and Calendar</b> 28.09(7)(f) 18.05(11)(h)	√	Documentation Review, and Interviews	Castle School has developed and implemented a written plan for staff orientation and training consistent with the needs of the student population.			
<b>12.2(a)</b> Behavior Management and Restraint Training 28.09(11) 18.05(5)	√	Documentation Review	Castle School's behavior management and restraint training complies with all of the mandated requirements.			
<b>15.1</b> <b>Parental Involvement</b>	√	Documentation Review	Castle School has developed a written plan for involving parents.			

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<b>and Parents' Advisory Group 18.05(4)(a)</b>	✓					
<b>16.3</b> Nursing 18.05(9)(b)	✓	Documentation Review	Castle School has secured the services of a registered nurse.			
<b>18.2</b> Student Records 28.09(10)  MGL c. 71, s. 34H 603 CMR 23.00  Family Educational Rights and Privacy Act (FERPA)	✓	Documentation and Student Record Review	Castle School maintains its student records in accordance with the criterion set forth in 18.2.			