



# **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

June 30, 2004

Doris Dyer  
Mercy Centre  
25 West Chester Street  
Worcester, MA 01605

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

Dear Ms. Dyer:

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 August 1, 2000. 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.

We are pleased to indicate that the Department of Education has found your school's approved Corrective Action Plan to be substantially implemented and effective in remedying previously identified noncompliance issues. Additionally, we have determined that your school is in substantial compliance with any new state or federal special education requirements enacted since your last Program Review. The findings of the Department are included in the attached Follow-up Monitoring Report. You and your entire staff are to be congratulated for your efforts in implementing all necessary improvements. Your private school will now receive an updated status of "Full Approval." This approval shall remain in effect for three (3) years from the date of this letter and attached approval certificate. This approval will be contingent upon continued compliance with all regulations contained within 603 CMR 28.00 "Special Education Regulations" and 603 CMR 18.00 "Program And Safety Standards For Approved Public Or Private Day And Residential Special Education School Programs." The Department of Education may change this approval status at any point during this three-year period if circumstances arise that warrant such a change.

The Department will notify you of your school's next regularly scheduled Program Review

several months before it is to occur. At this time we anticipate the Department's next routine monitoring visit to occur sometime during the FY 2007, unless the Department determines that there is some reason to schedule this visit earlier.

As the Department previously informed you, in cases where a private school fails to fully and effectively implement a Corrective Action Plan which was proposed by your school and approved by the Department, the Department must then prepare a Corrective Action Plan for the school which must be implemented without further delay. You will find these requirements for corrective action and further progress reporting included in the attached report together with any steps that must be taken by the school to fully implement new special education requirements. 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 **July 12, 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 Betsy Holcombe at 781-338-3717.

Sincerely,

Betsy Holcombe, Program Review Follow-up Chairperson  
Program Quality Assurance Services

John D. Stager, Administrator  
Program Quality Assurance Services

c: David P. Driscoll, Commissioner of Education  
Paul Hand, Sr., Chairperson, Board of Directors  
Doreen Donovan-Barbera, Local Program Review Coordinator

Encl.: Follow-up Monitoring Report

**MASSACHUSETTS DEPARTMENT OF EDUCATION  
PROGRAM REVIEW**

**Catholic Charities – Mercy Centre**

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

**Action Plan Submitted on September 15, 2000**

**Progress Reports Submitted on August – November 2000**

**Onsite Visit Conducted on June 1-2, 2004**

**Date of this Report June 30, 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)	√	Document- ation; Interviews				
<b>2.2</b> Approvals, Licenses, Certificates of Inspection 28.09 (2)(b)4-5 28.09(5) 28.09(6) 18.04(1)	√	Document- ation				

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102 CMR 3.06 (4)(b)						
<b>2.3</b> OCCS Licensure (Not Applicable to Day Schools)	Not Applicable					
<b>4.2(c)</b> Public Postings-Evacuation Routes 28.09(6)(e)	√	On-site verification	Evacuation routes must be posted in all rooms and areas utilized by the program.	√	Many evacuation routes are posted in the classrooms and other program areas.	All evacuation route signs will be posted by June 30, 2004.
<b>4.4</b> Advanced Notice of Program/Facility Change 28.09(5)(c)	√	Documentation; Interviews				
<b>4.5</b> Immediate Notification 18.03(10)	√	Policies and Procedures Manual	The written policy of notification in the Manual needs to include all required	√	The Form 2 and requirement to notify the Department of	The policy will be rewritten and the Form 2 will be included by June 30, 2004.

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18.05(7) 28.09(12)			elements.		Education were not included in the Manual.	
<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 and 300.400-401	√	Document-ation; Interviews				
<b>6.1</b> Daily Instructional Hours 603 C.M.R. 27.00	√	Document-ation; Interviews				

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<b>6.2</b> School Days per Year 28.09(9)	√	Document-ation; Interviews		√		
<b>7.1</b> Curriculum Frameworks 28.09(9)(b)	√	Document-ation; Interviews				
<b>8.4</b> Current IEP & Student Roster 28.09	√	Document-ation; Interviews				
<b>8.7</b> IEP - Progress Reports 34 CFR 300.347	√	Student records	The progress reports need to address all required elements.	√	The progress reports do not address whether the student is expected to meet the goal during the reporting period.	The progress reports will include all required elements by June 30, 2004.
<b>8.9</b> IEP- Less Restrictive	√	Document-ation;				

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Placement 28.09(9(c))		Interviews				
<b>9.3</b> Runaway Students 18.03(10)	√	Documentation; Interviews	A written policy regarding runaway students needs to be updated.	√	The policy needs to have a clarification of the definition of a runaway, which is appropriate to the population served.	The policy will be completed by June 30, 2004.
<b>9.5</b> 3-5 Day Suspensions 18.05(6)	√	Documentation; Interviews	The policy needs to be rewritten to delete the need to notify the Department of Education regarding suspensions.	√	The written policy and procedures do not include all required elements.	The policy will be completed by June 30, 2004.
<b>9.6</b> 10+ Day Suspensions 34 CFR 300.519-529	√	Documentation; Interviews	The written policy and procedures include all required elements.			
<b>10.1</b> Student:Teache	√	Document-				

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r Ratios 28.06(6)(d)&(g) 28.09(7)(e)	√	ation; Interviews				
<b>10.4</b> Student: Child Care Ratios 28.09(7) 18.01(2)	√	Document-ation; Interviews				
<b>11.1</b> Personnel Policies 28.09(7) 28.09(11)(a) 18.05(11)	√	Document-ation; Interviews				
<b>11.4</b> Teachers Special Education Teachers and Regular Education Teachers 28.09(7)(b)(c) 18.05(11)(f)	√	Document-ation; Interviews				

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	√			√		
<b>11.5</b> Related Services Staff 28.09(7)(d)	√	Document- ation; Interviews				
<b>11.6</b> Master Staff Roster 28.09(7)	√	Document- ation; Interviews				
<b>11.9</b> Organizational Structure 28.09(7) 28.07(c)	√	Document- ation; Interviews				
<b>11.12</b> Staff Coverage 18.03(1)(b)4	√	Document- ation; Interviews	There is a written plan to ensure staff coverage.			
<b>12.2</b> Annual In-Service Training Plan and Calendar 28.09(7)(f)	√	Document- ation; Interviews				

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18.05(11)(h)	√			√		
<b>12.2(a)</b> Behavior Management and Restraint Training 28.09(11) 18.05(5)	√	Documentation; Interviews				
<b>12.2(i)</b> Staff Evaluations 18.05(11)(c)1	√	Documentation; Interviews	Staff evaluations are written and maintained in the personnel records.			
<b>14.3</b> Toileting Procedures 18.03(8)	√	Documentation; Interviews	There is a written procedure for toileting.			
<b>15.1</b> Parental Involvement and Parents' Advisory Group 18.05(4)(a)	√	Documentation; Interviews				
<b>16.2</b>						

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Physician Consultation 18.05(9)(b)	√	Document- ation; Interviews	The program has a physician who is a consultant.	√		
<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)	√	Document- ation	The records include most of the required elements.	√	The name of the case manager assigned by the program needs to be included on the face sheet form.	The face sheet will be completed by June 30, 2004.