



**COTTING SCHOOL**

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

**Dates of Onsite Visit: March 28 – April 1, 2005**

**Date of Draft Report: May 12, 2005**

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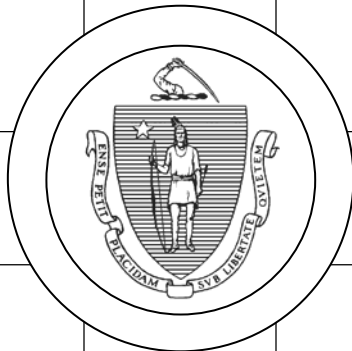
**Action Plan Due: July 25, 2005**

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

**COTTING SCHOOL**

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# MASSACHUSETTS DEPARTMENT OF EDUCATION

## APPROVED PRIVATE SCHOOL PROGRAM REVIEW REPORT

### OVERVIEW OF REVIEW PROCEDURES

#### INTRODUCTION

The Massachusetts Department of Education is required under MGL c. 71B, §10 to review special education programs in approved private special education schools that serve publicly funded students under the provisions of Board of Education Regulations 603 CMR 28.00 and 18.00. Each private school submits an application for approval by the Department of Education and periodically updates information included in the application on how special education services are provided. Each year, the Department's Program Quality Assurance Services unit conducts onsite visits to selected approved private schools to verify the implementation of their applications. The selected schools for 2004-2005 review cycle were notified in September 2004 of scheduled visits and were encouraged to assess themselves before the arrival of the Department's visiting team.

#### **Private School Program Review Elements**

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

**Scope:** All approved private schools in the Commonwealth are monitored through the Department's Private School Program Review system on a six-year cycle with an additional mid-cycle follow-up visit. This six-year monitoring and follow-up cycle is coordinated with the Department's Approved Private School Application Renewal procedures.

**Content:** The Program Review criteria encompass key elements drawn from 603 CMR 18.00 and 28.00 and the private school's application for approval. The elements selected for the 2004-2005 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: 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 Cotting School during the week of March 28, 2005 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 Cotting School. These features are as follows:

- *Cotting has a remarkable legacy. Started in 1893, by two pediatricians from Children’s Hospital, Drs. Bradford and Thorndike opened the first school for students with physical disabilities. Throughout the school there is a sense of the rich and meaningful history of the school. Of particular note is that the team had the privilege of meeting the great granddaughter of Dr. Thorndike and her daughter. The mother and daughter volunteer once a week in a classroom and this family has been and continues to be involved in the school since the beginning.*
- *The state regulations are meant to act as minimum requirements so that all schools are held to the same standards. In many cases, Cotting School policies and practices exceed the state requirements.*
- *Over the past year the school has secured a new Executive Director. The history and attention the former Executive Director provided to the school over his twenty years of service is noted. During times of such transition, there is typically an unsteady period for students, staff and families. The leadership of the new Executive Director was both thoughtful and thorough. He made and continues to make himself available to students, staff and families. Throughout the review week, the on-site team members were informed many times of the open door policy and the safe and nurturing environment at Cotting School under his leadership.*
- *Later in the report, the commendations of the curriculum are noted. An example of how Cotting continuously reflects upon the delivery of services to maximize student opportunities is that while the curriculum is commendable, the staff have formed a Curriculum Committee to continue to develop the curriculum in the most meaningful way for students. Cotting School also developed a crosswalk between their curriculum and the Massachusetts Curriculum Frameworks.*
- *The school building is well maintained and very clean. It is bright and colorful in design.*
- *As the on-site team moved about the school during the entire week, it was noticed that the students and staff at Cotting seem happy and have Cotting spirit. The teaching of self-advocacy at all levels was evident to the on-site team in all aspects of the school program.*
- *Cotting School sent out Parent Satisfaction Surveys in 2004 with a response rate of just under fifty percent. The responses were overwhelmingly in the “strongly agree” and “agree” categories in almost all areas. Some of the categories were: Cotting School has improved the*

*quality of my child's life; Cotting School has met or exceeded my expectations and Cotting provides through documentation and IEP development.*

- *Cotting School sent out School District Satisfaction Surveys in 2004 with a response rate of forty-five percent. The responses again, were overwhelmingly in the “strongly agree” and “agree” categories in almost all areas. Some of the categories were: Cotting School staff have strong positive relationships with students; Staff communicates important information to me in a timely manner; and Cotting School delivers effective academic services.*
- *The most recently published annual report has sayings throughout the book that state: “I am Cotting. I am joyful; I am fearless; I am inspiration; I am proud to serve; I am clever; I am deeply honored; I am pleased; I am strong; I am creative; I am dedicated; I am innovative; I am resilient; We are part of a tradition; We are partner’s in our children’s education; We are friends; We are Cotting. “ The on-site team saw all of these characteristics in the students, staff and families we interacted with throughout the week.*
- *Parents shared with the on-site team the wonderful social opportunities that their son/daughter’s are able to participate in, that, in the past, were not possible. Some out of school activities include going shopping at the mall and having sleepovers with their friends.*
- *Through its’ interdisciplinary approach, Cotting focuses on the whole child. Staff from all disciplines take advantage of teachable moments throughout the entire school day.*
- *Careful attention is given to meet the individual needs of each student and his/her family members.*
- *Typically it is difficult to maintain qualified staff members in private school settings. Following is a list, by position, of the average length of stay:*
  - *Program Assistants: 4 years*
  - *Teacher/Team Leaders: 14 years*
  - *Therapists (Occupational, Physical and Communication Therapy): 7 years*
  - *Specialists (School Psychologist, Guidance and Family Support): 7 years*
  - *Nurses: 5 years*

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 four (4) administrative staff
- Interviews of six (6) clinical staff.
- Interviews of twelve (12) teaching and educational support services staff.
- Interviews of zero (0) childcare staff.
- Interviews of one (1) Parent Group representatives and of six (6) other parents of Massachusetts students enrolled in the school.
- Interviews of zero (0) representatives of state and local agencies responsible for placement of students in the school.
- Student record review: A sample of twenty (20) 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 all instructional classrooms and other school facilities used in the delivery of programs and services was visited to determine general levels of compliance with program requirements.

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

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

# PRIVATE SCHOOL PROGRAM REVIEW REPORT

## EXECUTIVE SUMMARY

### COTTING SCHOOL

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

#### **AREA I: REQUIRED INFORMATION, NOTIFICATIONS AND POSTINGS**

*Has the private school (the School) developed a clear description of the student population served, its program and services that include philosophy, goals and objectives and mechanism for delivery of services?*

Cotting School has a clear description of the student population served and thoroughly describes its programs and services that include the philosophy, goals and objectives for the delivery of services. Cotting School is commended for following and embracing its mission statement that states, "Cotting School, founded in 1893 is a comprehensive program for students, ages 3 to 22, with physical, communication and other challenges to learning. Our mission is to provide the finest academic, vocational, therapy, enrichment and practical skills programs which will enable our students to achieve the highest possible degree of academic achievement, skill development and social/emotional maturity leading to independent life."

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

*Does the school maintain current approvals, licenses and certificates of inspection by state and local agencies in a place available for public and employee review?*

Cotting School maintains current approvals, licenses and certificates of inspection by state and local agencies in a place available for public and employee review.

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

*Has the school developed comprehensive policies and procedures that meet all criteria specified in the regulations? Has the program developed a Policies and Procedures Manual, a Personnel Policies Manual and a Health Care Manual? Has the school maintained these policies and procedures on site and provided written notice to parents and staff that copies of such policies are available upon request?*

Cotting School has comprehensive policies and procedures that meet all criteria specified in the regulations. In addition, the policies and procedures manuals contain additional "Cotting specific" information. Cotting School has a Policies and Procedures Manual, a Personnel Manual and a Health Care Manual which are maintained on site. Cotting School provides written notification to parents and staff that copies of such policies are available upon request.

Cotting School has employment practices that are free from discrimination. Employee recruitment is aimed at reaching all groups, including members of linguistic minorities, ethnic and racial minorities, females and males and persons with disabilities.

#### **AREA 4: DISCLOSURE OF INFORMATION**

*Has the school made available on site for public review all required information and postings?  
Has the school notified the Department of Education of substantial changes to the program and physical plant prior to the implementation of this change?*

*Does the school have written policies and procedures to ensure that immediate notifications are made to the parent, the public school district special education administrator, any state agency involved in the student care and placement and the Department of Education of serious incidents?*

Cotting School has made available on site for public review all required information and postings. Cotting School has not had any substantial changes to the program and physical plant in the past three years that required notification to the Department. Cotting School has written policies and procedures that ensure immediate notifications are made to parents, the public school district special education administrator, any state agency involved in the student care and placement and the Department of Education of serious incidents. Cotting School maintains written documentation of the required correspondence with all required parties in the students' records.

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

*Has the private school developed and implemented written admissions criteria, policies and procedures that contain all required components?*

*Does the private school work collaboratively with placing school districts to ensure that, to the maximum extent appropriate, children with disabilities are provided opportunities to be educated and socialized with children who do not have disabilities?*

Cotting School has developed and implemented commendable written admissions criteria as well as policies and procedures that contain all required components. The process includes the initial contact through student admission and is completed in a maximum of a two-week timeframe. Cotting School works collaboratively with placing school districts and work with students and parents to identify the vision statement of both the student and the parent. Cotting School has an assigned staff person with school district responsibility who has received appropriate training on her roles and responsibilities.

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

*Does the school provide annually at least the number of instructional hours and days required by law?*

Cotting School provides a minimum average of five hours of instructional time for elementary aged students and 5.5 hours of instructional time for secondary aged students. The school calendar includes five additional school days to account for unforeseen circumstances. Cotting School implements a school-to-work policy and procedure that counts this work as structured learning time. Cotting School allows the early release of High School seniors in accordance with the state regulations.

## **AREA 7: EDUCATIONAL PROGRAM REQUIREMENTS: CURRICULUM FRAMEWORKS AND STATE ASSESSMENT**

*Are programs designed to maximize students' performance and participation in the general curriculum? Is the school's general curriculum aligned with the Massachusetts Curriculum Frameworks?*

*Does the school ensure that all Massachusetts enrolled students participate in state and/or local district assessments?*

The curriculum at Cotting is comprehensive and is aligned with the Massachusetts Curriculum Frameworks. The staff have 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 to be full participants in the general curriculum.

Cotting School ensures that all students enrolled participate in the state and/or local district assessments as appropriate. Cotting School developed and follows written procedures for MCAS testing accommodations. Cotting School does an exceptional job in administering alternate assessments for students. The portfolios reviewed are "student centered" and provide the reader with a good understanding of the present level of performance of the student in each academic area.

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

*Has the school provided a description of the educational and related services implemented for the described student population? Has the private school provided a list of supplementary services available to enrolled students? (Describe education and related services and supplementary aids/services)*

*Does the school maintain current, signed IEPs for all students enrolled in the program? Does the school ensure that students are receiving educational, related and supplementary services as specified on their IEPs?*

Cotting School provides a description of the educational and related services implemented for the described student population. The academic and related services are interdisciplinary. Cotting School offers innumerable supplementary aids and services for the students enrolled. The assistive technology, communication therapy, physical therapy, occupational therapy, recreation services, parent counseling and training, health services and music therapy are all areas of commendation at Cotting School.

Cotting School maintains current, signed IEP's for all students enrolled in the program. The school ensures that students are receiving all education, related and supplementary services as specified on their IEP's. Each student is assigned an educational case manager who is responsible for ensuring that all IEP services are being implemented. Progress reports sent to parents, guardians, sending school districts and involved agencies document not only the continued areas of need, but also the specific achievements of the student in each academic area. Progress reports are not sent quarterly as required. Additionally, for students who attend the summer school program, the progress reports do not relate to the specific goals and objectives of the IEP. Cotting School does not participate in IEP meetings without the authorization and presence of the responsible school district personnel, nor do they revise or change the IEP. Cotting School works with the responsible school district to make any necessary referrals to the Bureau of Transitional Planning as appropriate.

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

*Has the school developed a comprehensive set of policies and procedures dealing with discipline and behavior management that meets all special education requirements and all applicable state and federal requirements pertaining to the use of restraint?*

Cotting School has a comprehensive set of policies and procedures that deals with discipline and behavior management that meet all special education requirements and all applicable state and federal requirements pertaining to the use of physical restraints. Cotting School staff consistently implement these policies and procedures including, but not limited to, policies dealing with restraints, suspensions and terminations.

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

*Does the school maintain appropriate staff-to-student ratios and age ranges throughout the day, evening and overnight hours?*

Cotting School maintains appropriate staff-to-student ratios in all aspects of the school. In addition, the youngest and oldest student in any instructional grouping do not differ by more than forty-eight months (4 years.)

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

*Has the school developed and implemented written personnel policies and procedures?*

*Does the school maintain in all program areas staff who are appropriately licensed or who hold current, valid waivers for the positions that they hold? Does the school provide ongoing professional development for staff?*

Cotting School has developed and implemented written personnel policies and procedures. In all program areas, Cotting School maintains staff who are appropriately licensed or who hold current, valid waivers for the positions in which they serve. Cotting School provides ongoing professional development for staff both internally as well as at various workshops and conferences. All teaching staff have a Professional Development Plan with supervisor approval.

Cotting School has developed an organizational structure that provides for the effective and efficient operation of the school and supervision of staff and students. The school has established a plan to ensure that there is appropriate staff coverage in the event of illness, staff vacancies, emergencies and other unexpected circumstances.

Cotting School has 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. Cotting School implements a detailed plan for individual and group recreational programs appropriate to the age, interests and needs of students. Activities are varied and include everything from chess club to Friday night basketball games and sewing club to a ski trip. The school maintains appropriate staffing patterns during these activities. These

extracurricular activities are offered in a nondiscriminatory manner and all students are encouraged to participate.

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

*Has the school developed and implemented a written plan for orientation of all new staff to ensure understanding of the school's philosophy, organization, program, practices and goals? Has the school developed a written plan for staff training that is consistent with the needs of the student population and appropriate to the role of each staff member and that provides, on average, at least two hours per month of relevant training for all staff including non-professional staff?*

Cotting School has developed and implements a written plan for the orientation of all new staff that ensures understanding of the school's philosophy, organization, program practices and goals as well as all mandated training topics. Staff are given an orientation manual that includes materials on all topics covered throughout their orientation to Cotting School. This manual is then used for staff reference. Cotting School has a written plan for staff training that is consistent with the needs of the student population and appropriate to the role of each staff member and that provides, on average, at least two hours per month of relevant trainings for all staff. Cotting seeks input from staff members on training topics. Recently, Cotting had a "Professional Development Task Force" to ensure that the interests and needs of all staff members were considered. All staff providing direct care services to students receive annual training on the Department's mandated training topics. Cotting School implements a procedure for evaluating staff consistent with the written policy included in the Personnel Policy and Procedure Manual.

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

*Does the school provide the facilities, textbooks, equipment, technology, materials, and supplies needed to provide the special education and related services specified on students' IEPs? Has the school ensured that individuals with limited physical mobility have access to those areas of the school buildings and grounds to which access is necessary for the implementation of their IEPs?*

Cotting School provides the facilities, textbooks, equipment, technology, materials and supplies needed to provide the special education and related services as specified on the students' IEP's. Cotting School exceeds requirements for physical facilities and equipment as evidenced by the adaptive books, laptops, slant desks, talking books, Occupational Therapy equipment, Physical Therapy equipment, the art room, the music room, the on-site vision clinic, the on-site dental clinic and the library. The school has classroom space that is adequate with respect to the number, size and age of students, as well as the student's specific educational needs. The library is separate from the regular instructional space with numerous versions of resources that are cataloged and used daily by students, staff and families. Cotting School ensures that individuals with limited physical mobility have access to all areas of the school building. The interior of the school is very well maintained and clean while the outside of the school shows pride of ownership through various seasonal plantings in memory of former students and staff members.

#### **AREA 14: REQUIREMENTS FOR DAILY CARE**

*Does the private school staff understand the nutritional and toileting requirements of students enrolled in the program?*

Cotting School staff understand the nutritional requirements of students enrolled in the program. Training is provided to staff on specialized dietary needs of students as appropriate.

Written plans describing required procedures including regular toileting and diapering, disposal and laundering of soiled clothing or diapers while protecting the personal privacy of all students are followed. Toilet training plans are based on parental input, the IEP and the student's physical and emotional abilities.

#### **AREA 15: PARENT AND STUDENT INVOLVEMENT**

*Has the private school developed a written plan for involving parents that includes the development of a Parents' Advisory Group?*

Cotting School has developed a written plan for involving parents that includes the development of a Parents' Advisory Committee that advises the school on matters that pertain to the education, health and safety of the students. In addition, the school encourages all parents to be part of the Cotting Family Community whose goal is to enhance communication and networking among families and between home and school. Support and training groups are also offered from Cotting School staff.

Cotting School obtains all necessary parent consents and updates these consents annually. Cotting School has developed and made available to parents, students and staff written procedures for registering complaints. Cotting takes all necessary steps to ensure student participation in Team meetings when appropriate.

#### **AREA 16: HEALTH AND MEDICAL SERVICES**

See Area 3

*Is the private school implementing all health care and medical policies and procedures as specified in the Health Care Policies and Procedures Manual including, but not limited to physician consultation, nursing services, emergency first aid, administration of medication and preventive health care?*

Cotting School implements health care and medical policies and procedures as specified in the Health Care Policies and Procedures Manual including, but not limited to physician consultation, nursing services, emergency first aid, administration of medication and preventive health care. A licensed physician approves the Health Care Manual. The nursing staff are commended for the enormous amount of time and energy they spend working with students who are in many instances, medically involved. Many of the students have unique diagnoses which require the medical staff to ensure that they have current, appropriate medical treatments and procedures they are following.

#### **AREA 17: TRANSPORTATION SAFETY**

*When appropriate, does the private school develop 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 students' needs and provisions of their IEP?*

Cotting School has transportation procedures that ensures that vehicles are safe, insured and operated by qualified and trained individuals. Students are transported in a safe manner that is responsive to their individual needs and provisions of their IEP.

## **AREA 18: STUDENT RECORDS**

*Does the private school keep current and complete files for each publicly funded enrolled Massachusetts student and maintain them in accordance with the Massachusetts Student Record Regulations?*

Cotting School keeps current and complete files for each publicly funded Massachusetts student and maintains them in accordance with the Massachusetts Student Record Regulations. The student records contain all required information including a face sheet that is updated annually or as needed. Paperwork is easily found in the student records as a result of the set-up of the records.

**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
<b>1.2 Program &amp; Student Description  Program Capacity  28.09(2)(b)(2,3,7)</b>	A narrative is provided that describes the program's: a. Operational capacity b. Identified population of students to be served, including the current and/or projected enrollment maximum enrollment, ages of students and their educational and behavioral characteristics c. Philosophy, goals and objectives d. Mechanisms for delivery of services
	<b>Rating: Commendable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**

*Based on a review of documentation, interviews and staff observations, Cotting School follows and embraces the mission statement of the school, which states, "Cotting School, founded in 1893 is a comprehensive program for students, ages 3 to 22, with physical, communication and other challenges to learning. Our mission is to provide the finest academic, vocational, therapy, enrichment and practical skills programs which will enable our students to achieve the highest possible degree of academic achievement, skill development and social/emotional maturity leading to independent life." The on site team found this mission statement to be completely followed. In all disciplines, the staff of the school have an in depth understanding of the unique needs of each of the students with whom they work.*

CRITERION NUMBER	Legal Standard
<b>1.3 Program's Curriculum 28.09(9)</b>	The program provides a description of its 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.  Included in the private schools 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.
	<b>Rating: Commendable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**

*Based on a review of documentation, staff interviews and observations, Cotting School provides and implements a written plan that describes opportunities for students to participate in daily recreational and leisure activities that are appropriate to the ages, interests and needs of the students enrolled. Cotting School provides leisure activities such as drama club, painting, cooking club, simple sewing and outdoor exploration. Students are also offered innumerable opportunities that would not routinely be considered for students with physical disabilities such as a basketball team, cheerleading, a ski trip, a weekend independent summer outing and dances throughout the school year. Students are also able to participate in a Friday evening program called “circle of friends” which allows students to go to events in the community with their friends from school. An example of how Cotting School encourages these opportunities for all students is that all students, regardless of their physical abilities are able to participate. Activities and events are also planned in a “typical” manner for students such as Friday night basketball games and include the Falcon mascot.*

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

CRITERION NUMBER	Legal Standard
<p><b>2.2 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>The program has current licenses, approvals, and certificates of inspection by state and local agencies for:</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);*               <ul style="list-style-type: none"> <li>a. [See 102 CMR 308(4)(b): All buildings, residential or otherwise, utilized by children younger than six or with a mental age younger than six shall be free of lead paint violations in accordance with 105 CMR 460.000 (Massachusetts Department of Public Health Prevention and Control of Lead Poisoning regulations).]</li> </ul> </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 or date when building was constructed and statement from appropriate authority that building is asbestos free;</li> <li>i. PCB inspection or date when building was constructed and statement from appropriate authority that building and all light ballasts are free from PCB's;</li> <li>j. Other inspections that may be required by local or state authorities; and</li> <li>k. (If applicable) a statement as to whether previous application was made for approval, and the action that was taken on it.</li> </ul> <p>*A program with a residential component may submit the most recent OCCS license to fulfill those requirements marked with an asterisk (*).</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>
<b>2.3 OCCS License (NA to Day Schools)</b>	The program has a current, full license from Office for Child Care Services (OCCS) (per 102 CMR 3.00) to operate as a residential school.
	<b>Rating: Not Applicable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

*Cotting School is approved as a day school and therefore does not need a license from the Office for Child Care Services (OCCS).*

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>3.1 Policies &amp; Procedures Manual 28.09(11)(b)</b>	All approved public and private special education schools shall maintain onsite a policies and procedures manual and shall provide written notice to parents of enrolled students that copies of such policies and procedures are available upon request.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>3.1(a) Contents</b>	The program's manual must contain policies and procedures in all subject areas listed in the appendix at the back of this application.  These policies and procedures include, but are not limited to: <ul style="list-style-type: none"> <li>a. Advanced notice of proposed program/facility change</li> <li>b. Student admissions</li> </ul>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<ul style="list-style-type: none"> <li>c. Child abuse/neglect</li> <li>d. Discipline policies and procedures</li> <li>e. Suspension and termination</li> <li>f. Student discipline and behavior management</li> <li>g. Physical restraint</li> <li>h. Student runaway</li> <li>i. Notification of serious incidents (Form 2)</li> <li>j. Coordination and collaboration with school districts</li> <li>k. IEP- revisions and changes</li> <li>l. IEP- transition planning</li> <li>m. IEP- transition services</li> <li>n. State and district-wide assessments</li> <li>o. Progress reports</li> <li>p. Least restrictive placements</li> <li>q. Evacuation and emergency procedures</li> <li>r. Parent involvement</li> <li>s. Orientation for new parents and students</li> <li>t. Change of student's legal status</li> <li>u. Obtaining parental consent</li> <li>v. Student involvement</li> <li>w. Registering complaints- parents and students</li> <li>x. Student protections</li> <li>y. Supervision of students</li> <li>z. Student records</li> <li>aa. New staff orientation and annual in-service training</li> <li>bb. Student transportation and transportation safety</li> <li>cc. Research, experimentation, fund raising, publicity, and observation</li> </ul> <p>Appendix with all signed and dated Assurances sent to the Department in connection with this application.</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><b>3.1(b)</b></p> <p><b>School District Employment Practices</b></p> <p><b>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(c); EEOA: 20</b></p>	<p>Employment practices in public/private special education programs in general are free from discrimination on the basis of race, color, national origin, sex or disability. In particular, faculty salary scales are based on the conditions and responsibilities of employment without regard to race, color, national origin, sex or disability, and employee recruitment is aimed at reaching all groups, including members of linguistic, ethnic, and racial minorities, females and males, and persons with disabilities.</p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>U.S.C. 1703(d); Title IX: 20 U.S.C. 1681; 34 CFR 106.51-106.61; Section 504: 29 U.S.C. 794; 34 CFR 104.11-104.14; Title II: 42 U.S.C. 12132; 28 CFR 35.140; Mass. Const. amend. art 114</b>	
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>3.2 Health Care Manual 18.05 (9)(d)</b>	<p>The program maintains a written and current health care policies and procedures manual containing all required health-related policies and procedures as described in 603 CMR 28.00 and 603 CMR 18.00, and approved by a licensed physician. The manual is readily available to all staff and includes policies and procedures on the following subjects:</p> <ul style="list-style-type: none"> <li>a. Provision of medical, nursing, and infirmary care</li> <li>b. Emergency first aid (see criterion 16.4)</li> <li>c. Administration of medications, per DPH regulations</li> <li>d. Administration of anti-psychotic medications including, where appropriate, “Rogers Procedures”</li> <li>e. Preventive health care (see 16.7)</li> <li>f. Receipt of medical treatment in accordance with students’ religious beliefs</li> <li>g. No smoking policy (see Assurance on this subject)</li> <li>h. Toileting procedures</li> <li>i. Food and nutrition (see 14.2)</li> </ul> <p>Name and contact information for consultant physician and additional emergency contacts.</p>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>3.3 Special Education Regulations and Reference Materials</b>  <b>State: 603 CMR 28.00 Federal: 34 CFR 300.300-.577 and Appendix A</b>	<p>State regulations and specified excerpts from current federal special education regulations and related reference materials must be compiled and readily available for parents and staff to inspect.</p> <p>This compilation of materials must contain at least the following 5 documents:</p> <ul 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 Department of Education IEP Process Guide and IEP Forms</li> <li>e. State restraint regulations (for day schools)</li> </ul>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**AREA 4: DISCLOSURE OF INFORMATION**

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>4.1 Aspects of program, staff credentials and student records 28.09 (5)(a)</b>	<p>The public or private special education school shall make available to the Department information on all aspects of the school's program(s), the license and/or credentials of its staff and the individual records of enrolled Massachusetts students.</p>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

CRITERION NUMBER	
<p><b>4.2 Public information and Postings</b>  <b>28.09(6)(a,b,c,d,e),</b>  <b>28.09(2)(b)(4)</b></p>	<p style="text-align: center;"><b>Legal Standard</b></p> <p>The public or private special education school maintains on site and makes available for public review by posting in public locations the following:</p> <ol 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 (must be posted in a public location)</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. <u>For public programs</u>: a notice that use of tobacco products is not permitted on school property or at any school related function (must be posted in a public location)</li> <li>e. <u>For private programs</u>: a notice that use of tobacco products is not permitted in school buildings (must be posted in a public location)</li> <li>f. Program information including a statement of purpose, general description of educational program and an organizational chart</li> </ol> <p>In addition to the above, <u>private special education schools must maintain the following information</u> for public review:</p> <ol style="list-style-type: none"> <li>a. Current tuition rate for students</li> <li>b. Evidence of authority to operate the private school including Documents that identify ownership and, as applicable, partnership agreements, the names of officers, boards, charters, articles of organization and by-laws</li> </ol>
	<p><b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p>

CRITERION NUMBER	
<p><b>4.4 Advance notice of Proposed Program/ Facility Change</b>  <b>28.09 (5)(c)</b></p>	<p style="text-align: center;"><b>Legal Standard</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 IEPs. Examples of changes include, but are not limited to:</p> <ol style="list-style-type: none"> <li>a. Changes (e.g. increases or reductions) in services or staff including temporary staff shortages that alter the previously approved student/teacher (or student/childcare) ratios and/or affect the program or service delivery to students per their IEPs;</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</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	approved by the Department; and e. Significant changes in program policies or procedures.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**Department of Education Comment:**

*Cotting School has not had a substantial change to the program or physical plant in the past three years that required notification to the Department to obtain approval.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>4.5 Immediate notification 18.03(10) 18.05(7) 28.09(12)</b>	<p>For <u>all</u> students (regardless of state of residency), the public/private program 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> <ol style="list-style-type: none"> <li>a. Death of a student</li> <li>b. Hospitalization of a student, including outpatient 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>c. Injury of a student in a motor vehicle accident</li> <li>d. In-patient psychiatric hospitalization of a student due to an emergency mental health crisis that occurs while the student is in the program</li> <li>e. Administration of medication to a student in an emergency situation</li> <li>f. Running away of a student</li> <li>g. 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 <ul style="list-style-type: none"> <li>o A written termination summary explaining the reasons for the emergency termination must be sent to the parent(s), the student (if over 14 years of age), the local Administrator of Special Education, officials of the appropriate Human Service Agency and the Department of Education.</li> </ul> </li> <li>h. 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</li> <li>i. Any action taken by a federal, state or local agency that might jeopardize the school's approval with the Department or any legal proceeding brought against the school or its employee(s) arising out of circumstances related to the care or education of any of its students regardless of state of residency</li> </ol>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>



CRITERION NUMBER	
<p><b>5.2 Policies and Procedures for Coordination /Collaboration with Public School Districts &amp; Contents for Coordination /Collaboration with Public School Districts</b></p> <p><b>28.06(2-3) 28.09(9)(c) &amp;(d) 28.09(2)(b)7</b></p> <p><b>Federal Regulations: 300.349 and 300.400-.401</b></p> <p><b>28.06(2-3) 28.07(5) 28.09(9)(c) &amp;(d) 28.09(2)(b)7</b></p> <p><b>Federal Regulations: 300.349 and 300.400-401</b></p>	<p style="text-align: center;"><b>Legal Standard</b></p> <p>The public or private special education program works collaboratively with the placing public school district to ensure that, to the maximum extent appropriate, children with disabilities are educated with children who do not have disabilities, are provided access to the general education program and are given opportunities to return to a less restrictive educational program.</p> <p>A private school shall have policies and procedures that describe roles and responsibilities of the program and its staff as well as general communication and collaboration procedures that address the following:</p> <ol style="list-style-type: none"> <li>a. Consideration of possible placement and admissions process;</li> <li>b. IEP development and implementation and roles in 3-year eligibility re-determinations;</li> <li>c. Contents of and general arrangements for executing contracts with placing school districts;</li> <li>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>e. Written progress reports;</li> <li>f. Documentation regarding student-related developments, including matters involving students’ behavioral plans, functional behavioral assessments, manifestation determinations, imposition of discipline, etc.</li> <li>g. Administration of tests;</li> <li>h. Preparations for students returning to a public school or other less restrictive setting;</li> <li>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>j. School district monitoring of student progress;</li> <li>k. Granting of high school diplomas consistent with Department of Education requirements; and</li> <li>l. Conditions for issuance of certificates of attendance or program completion by a private school or educational collaborative.</li> </ol> <p>NOTE: Please review federal regulations 300.349 and 300.400-401 before preparing this policy/procedure. Public school districts have the lead responsibility for convening the Team that makes the initial and subsequent (every 3 years) eligibility determinations, develops the IEP, and decides upon an appropriate placement. Private and educational collaborative programs, however, play a major role in determining whether a proposed placement in the program will meet a student’s needs. Private and educational collaborative programs have the responsibility of delivering services on the IEP, assessing and communicating progress, developing subsequent IEPs and planning for the student’s return to a less restrictive environment and/or for adult life.</p>
	<p><b>Rating: Commendable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p>

**Department of Education Findings:**

*Based on a review of documentation, staff interviews and a review of student records, Cotting School is thorough in providing coordination and collaboration with public school districts. In particular, Cotting School helps develop the IEP by providing a very comprehensive summary of the present level of performance for each student in each appropriate subject area. Staff also gathers information from all students regarding the vision of their program and future and this, too, is appropriately considered and included. The progress reports that Cotting writes not only identify the continued areas of need for the student in each academic area, but also specifies individual student gains.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>5.4 Training 18.05(11)(g)(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 Staff Coordinator 28.09(7)</b>	A senior person(s) 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 Daily Instructional</b>	Unless otherwise approved by the Department of Education, the public/private special education program provides an average annual minimum of the following instructional hours: <ul style="list-style-type: none"> <li>• Elementary: 5 hours per school day (except for kindergarten)</li> <li>• Secondary: 5 ½ hours per school day</li> </ul>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>Hours 603 CMR 27.00</b>	The public/private special education program ensures that, unless a student's IEP or Section 504 Accommodation Plan provides otherwise, each elementary school student is scheduled for at least 900 hours of structured learning time a year and each secondary school student is scheduled for at least 990 hours of structured learning time a year, within the required school year schedule. Where the public/private special education program operates separate middle schools, at the beginning of the school year it designates each one as either elementary or secondary.
	<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 School-to-Work  603 CMR 27.02, 27.04</b>	Where the public/private special education program counts independent study or a school-to-work program as structured learning time, it has guidelines that explain clearly how hours spent by students are verified.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>6.3 Kindergarten  603 CMR 27.03(5)</b>	Where the public/private special education program sets a separate school year and school day schedule for kindergarten programs, it provides at least 425 hours of structured learning time a year. If two sessions of kindergarten per day are scheduled, it ensures equal instructional time for all kindergarten students.
	<b>Rating: Not Applicable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**  
*Cotting School does not offer a kindergarten program.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>6.4</b> <b>School Days per Year</b> <b>28.09(9)</b>	<p>The public/private special education program is conducted for the following days (exclusive of weekends, holidays, vacations):</p> <ul style="list-style-type: none"> <li>• 10 month program - 180 days</li> <li>• 11 month program – 198 days</li> <li>• 12 month program – 216 days</li> </ul> <p>Before the beginning of each school year, the public/private special education program sets a school year schedule for each program. This schedule must include at least five additional school days to account for unforeseen circumstances (i.e. snowstorms).</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>6.5</b> <b>Early Release of High School Seniors</b> <b>603 CMR 27.05</b>	<p>When a public/private special education program schedules the early release at the end of the year of the senior class of a high school, it does so in accordance with a written policy that conforms with Board of Education requirements under 603 CMR 27.05, ensuring that neither the conclusion of the seniors’ school year nor graduation is more than 12 school days before the regular scheduled closing date of that school.</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<p><b>AREA 7: EDUCATIONAL PROGRAM REQUIREMENTS -- CURRICULUM FRAMEWORKS AND STATE ASSESSMENTS</b></p>
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<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>7.1</b> <b>Curriculum Frameworks</b>	<p>The program’s personnel shall 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</p>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>28.09(9)(b)</b>	<p>participants in the general curriculum.</p> <p>The program has either aligned its curriculum with the Frameworks or has taken steps to provide <u>all</u> students with essential learning opportunities that prepare the students to reach the state graduation standards.</p>
	<b>Rating: Commendable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**

*Based on a review of documentation and staff interviews, Cotting School has aligned its curriculum with the Massachusetts Curriculum Frameworks. Cotting has over twenty-five curriculum guides that address all aspects of the curriculum needs of the students and the activities in which they participate. The teachers and personnel have a full understanding of the connection between the Massachusetts Curriculum Frameworks and the general curriculum.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>7.2 Staff Training 28.09 (9)(b)</b>	<p>The program shall ensure that all staff including non-professional staff 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.</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>7.3 State/District Wide Assessments 28.09(9)(d)</b>	<p>The program has a written procedure outlining how the school will ensure that <u>all</u> 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 as determined by each student’s Team.</p>
	<b>Rating: Commendable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**

*Based on a review of documentation, staff interviews and student portfolios, Cotting School provides MCAS testing with accommodations and /or administers alternate assessments as determined by each student’s Team. In particular, the alternate assessment portfolios maintained for the students are*



<b>CRITERION NUMBER</b>			
	<b>Legal Standard</b>		
	<ul style="list-style-type: none"> <li>g. Occupational therapy</li> <li>h. Recreation services</li> <li>i. Mobility/orientation training</li> <li>j. Psychological services, counseling services, rehabilitation counseling services, social work services</li> <li>k. Parent counseling and training</li> <li>l. School health services, medical services</li> <li>m. Other (e.g., music therapy, sensory integration therapy)</li> </ul>		
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><b>Rating: Commendable</b></td> <td style="width: 50%; text-align: right;"><b>RESPONSE REQUIRED: No</b></td> </tr> </table>	<b>Rating: Commendable</b>	<b>RESPONSE REQUIRED: No</b>
<b>Rating: Commendable</b>	<b>RESPONSE REQUIRED: No</b>		

**Department of Education Findings:**

*Based on a review of documentation and student records, staff interviews and observations, Cotting School specifies and implements the following services in a comprehensive and commendable manner:*

- *The assistive technology available for student use is thorough and state of the art. Cotting School stays current and informed regarding programs that will benefit the students with whom they work. Computers used represent both Mac and Windows platforms. Various input methods are used such as scanning on screen access, alternative keyboards and voice recognition.*
- *Communication Therapy is the term used at Cotting School to reflect a range of communication, speech and language needs. The Communication Therapist incorporates methodologies for students in all settings throughout the school. Skills focused on include addressing language disorders, augmentative communication needs and social and pragmatic challenges.*
- *The Physical Therapy and Occupational Therapy provided to students offers various equipment and is in a large space to accommodate the needs of the students. These specialists provide students with “real-life” learning opportunities such as maneuvering their wheelchair around obstacles on a sidewalk or using utensils in a restaurant. Physical Therapy and Occupational Therapy are part of the educational interdisciplinary team at Cotting.*
- *Recreation Services are offered beyond the regular school day hours. Some activities include golf, track and chess clubs. Each session runs between six and eight weeks during the Fall, Winter and Spring sessions and input is gathered from students, parents and staff.*
- *Parent counseling and training is offered to families at Cotting through provision of psychological services as well as family outreach. Everything from self-esteem to family assistance to transition plans are addressed as appropriate to each student and his/her family.*
- *The health services are offered through six nurses, one licensed practical nurse and one certified nurse’s aide. Students’ medical needs are met through assessment, planning, implementation and evaluation by these specialists. Due to the unique medical diagnoses and medical needs of the students served at Cotting School the medical staff are required to ensure the information they gather is thorough and complete to maintain the health and safety of the students. The nurses maintain individual health care plans for each student, which is developed in coordination with the parent(s) and/or guardian(s).*
- *Music Therapy is offered to all students and observations revealed the joy on the faces of the students who were participating. All students are encouraged to participate and the teacher*





<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>8.7 IEP Implementation 28.09</b>	The program shall implement all services on the students' IEPs.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>8.8 IEP – Progress Reports 28.07(3)  20 U.S.C. Chapter 33, Section 1414(d)(1)(A) (viii)  IDEA Regulations: 300.347</b>	<p>The program shall send copies, at least quarterly, of progress reports to the parents and public school (if student is in a collaborative or private placement).</p> <p>Such reports must include written information on the student's progress toward the annual goals in the IEP (specifying each quarter), 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 shall be maintained in student records, <u>including documentation of persons or agencies receiving such reports.</u></p>
	<b>Rating: Partially Implemented</b> <b>RESPONSE REQUIRED: Yes</b>

**Department of Education Findings:**

*Staff interviews and a review of student records indicated that, although the progress reports that Cotting School submits to parents and the sending school district are thorough, they are required to be sent four times per school year. For students enrolled in the summer program, the progress reports need to reflect the IEP goals and include information on the extent to which the student's progress is sufficient to enable the student to achieve the goal.*

<b>CRITERION NUMBER</b>	<b>TOPIC</b>
	<b>Legal Standard</b>
	The program notifies the responsible public school district and parents whenever the

<b>CRITERION NUMBER</b>	<b>TOPIC</b>
	<b>Legal Standard</b>
<b>8.9 IEP – Revisions &amp; Changes 34 CFR 300</b>	<p>IEP needs to be revised to reflect a change in goals, placement, or a return to a less restrictive setting.</p> <p>In no case shall the private school or educational collaborative provide notice of a Team meeting required by state and federal special education requirements. In no case shall the private school or educational collaborative 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 or collaborative issue a new or revised IEP for a student.</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	<b>TOPIC</b>
	<b>Legal Standard</b>
<b>8.10 IEP – Less Restrictive Placement 28.09(9)(c)</b>	<p>The 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 in a general education classroom, or other community program, or a period of transition from one program option to a less restrictive program option.</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	<b>TOPIC</b>
	<b>Legal Standard</b>
<b>8.11 IEP- Transition Planning 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 program must work 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 program must work 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: Commendable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**

*Based on a review of documentation, staff interviews and a review of student records, Cotting School staff work with the sending school district as well as the student and parents/or guardians to develop a vision statement from both parties. The vision statements provide the team with needed information on the focus and interests of the student. The staff clearly delineates the parent and student visions and work with all parties ahead of time, which then generates a thoughtful discussion at the Team meeting. As appropriate, Cotting School develops a transition plan for students who are moving on with specific goals, timelines and persons responsible. This helps the Team stay focused and ensure that the needs of the students are met during transition times.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>8.12 IEP – Transition Services 28.05(4)(c)</b>	<p>For students approaching graduation or the age of twenty-two, the public or private school’s participant on the IEP Team will provide 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 or public school may make the 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, §12-A-§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>	<p>The program 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.</p>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>9.2 Discipline Code</b>	<p>The public/private special education program develops and implements a student discipline code of conduct.</p> <p>For <u>public</u> out-of-district programs in a building containing grades nine to twelve, inclusive, a student handbook setting forth rules pertaining to the conduct of students must be distributed to each student (as described in M.G.L. c. 71, s. 37H).</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>9.3 Runaway Students 18.03 (10)</b>	<p>The program shall have a written policy, including a definition of runaways, appropriate for the school population and location, as well as procedures for handling students who run away.</p> <p>These policies must be approved by the Department of Education.</p> <p>The school must notify the Department, the local school district and/or other involved agencies and parents immediately whenever any student runs away.</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>9.4 Restraints 18.05 (5) 603 CMR 46.00</b>	<p>A public or private <u>day</u> educational program must develop a policy on the use of physical restraint and administer physical restraint in accordance with the requirements of 603 CMR 46.00.</p> <p>A residential educational program and any day educational program operated by a residential program must comply 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 must comply with the restraint requirements of M.G.L. c. 123, 104 CMR 27.12 or 104 CMR 28.05, where applicable.</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

CRITERION NUMBER	
	<b>Legal Standard</b>
<p><b>9.5</b></p> <p><b>3-5 Day Suspensions</b></p> <p><b>18.05(6)</b></p>	<p>Upon admission of a student, the public/private special education program shall provide a written policy on suspensions to the parents and to the school district and human service agency that placed the student. Such policy shall also contain the following information:</p> <ul 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> </ul> <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: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p>

CRITERION NUMBER	
	<b>Legal Standard</b>
<p><b>9.6</b></p> <p><b>Suspensions</b></p> <p><b>Joint responsibilities of the public/private school and the responsible school district</b></p>	<p>The public/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> <ul 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: <ul style="list-style-type: none"> <li>o To develop or review a functional behavioral assessment of the student’s behavior and to develop or modify a behavior</li> </ul> </li> </ul>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>Federal Requirements: 34 CFR 300.519-.529</b>	<p style="text-align: center;">intervention plan;</p> <ul style="list-style-type: none"> <li>o To identify appropriate alternative educational setting(s); and</li> <li>c. To conduct a manifestation determination (i.e. to determine the relationship between the disability and the behavior). [To do this, the Team asks questions including: Is the IEP appropriate? Is the placement appropriate? If there was a behavior plan, was it implemented? Does the student understand the impact and consequences of his/her behavior? Can the student control his/her behavior?].</li> <li>d. If the Team determines that the behavior is <u>NOT</u> a manifestation of the disability, the school may suspend or terminate the student consistent with policies applied to any other student in the program. The responsible school district must, however, offer an appropriate education program to the student with disabilities that may be in some other setting.</li> <li>e. If the TEAM determines that the behavior <u>IS</u> a manifestation of the disability, the placing district, in coordination with the private school, takes steps (with the consent of the parent) to modify the IEP, the behavior intervention plan, and/or the placement.</li> </ul>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>9.7 Terminations 28.09(12) 18.05(7)</b>	<p>The public/private special education program shall not terminate the enrollment of any student, even in emergency circumstances, until the enrolling public school district is informed and assumes responsibility for the student.</p> <p>The program develops a written termination policy that includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>a. At the request of the public school district, the program shall delay termination of the student for up to two (2) calendar weeks to allow the public school district the opportunity to convene an emergency Team meeting or to conduct other appropriate planning discussions prior to the student's termination.</li> <li>b. With mutual agreement between the public/private special education program and the placing public school district, termination of enrollment may be delayed for longer than two calendar weeks.</li> <li>c. For <u>planned</u> terminations, the public/private special education program shall notify the public school district of the need for an IEP review meeting and provides notice of this meeting to all appropriate parties ten (10) days in advance of the intended date of the meeting. The purpose of the meeting will be to develop a clear and specific termination plan for the student that shall be implemented in no less than thirty (30) days unless all parties agree to an earlier termination date.</li> <li>d. For <u>emergency</u> terminations, which are circumstances where the student</li> </ul>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	presents a clear and present threat to the health and safety of him/herself or others, the program shall follow the procedures required under 603 CMR 28.09(12)(b) and immediately notify the Department of Education.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>10.1 Student: Teacher Ratios 28.06(6)(d)&amp;(g) 28.09(7)(e)</b>	<p>\Unless otherwise approved by the Department of Education, the public/private special education program ensures that instructional groupings do not exceed:</p> <ul style="list-style-type: none"> <li>• 8 students to one certified teacher without an aide</li> <li>• 12 students to one certified teacher with an aide</li> </ul>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>10.2 Age Range 28.06(6)(f)</b>	The program shall ensure that the ages of the youngest and oldest child in any instructional grouping shall not differ by more than forty-eight months (4 years).
	<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 28.09(7)(e) 28.06(7)</b>	The program shall ensure 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>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>10.4 Student: Child Care Ratios 28.09(7) 18.01(2)</b>	The program has a student to childcare worker ratio of: <ul style="list-style-type: none"> <li>• Not lower than 4:1 nor greater than 6:1 during non- “school day” waking hours</li> <li>• Not lower than 6:1 nor greater than 8:1 during sleeping hours</li> </ul>
	<b>Rating: Not Applicable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**  
*Cotting School does not employ childcare workers.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>10.5 Alternative Ratios 18.03(2)</b>	Where applicable, the public/private special education program shall submit a justification for alternative ratios for student to childcare workers, and the Department shall approve or disapprove these at its discretion.
	<b>Rating: Not Applicable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**  
*Cotting School has not requested alternative ratios.*



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<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 Educational Administrator Qualifications 28.09(7)(a) 603 CMR 44.00 and 44.04</b>	<p>The program shall designate an educational administrator to supervise the provision of special education services in the school and to ensure that the services specified in each student’s IEP are delivered. The educational administrator either shall have licensure as a special education administrator or all of the following:</p> <ul style="list-style-type: none"> <li>• A current license as a special educator;</li> <li>• A minimum of a master's degree in special education or a related field; and</li> <li>• A minimum of one year of administrative experience.</li> </ul> <p>The educational administrator shall be re-licensed pursuant to the requirements of 603 CMR 44.00.</p> <p>The educational administrator shall obtain supervisory approval of his/her Professional Development Plan per 603 CMR 44.04.</p>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.4 Teachers (Special Education Teachers and Regular Education Teachers) 28.09(7)(b)(c) 18.05(11)(f)</b>	<p>The public/private special education program must ensure that all teaching staff have teaching license (certification) appropriate to meet the needs of the population being served pursuant to the requirements of 603 CMR 7.00 and, additionally, must adhere to the following requirements:</p> <ol style="list-style-type: none"> <li>a. All teaching staff shall be re-licensed pursuant to the requirements of 603 CMR 44.00 and shall be subject to the same requirements as teachers in Massachusetts public schools and shall be required to obtain supervisor approval of Professional Development Plans pursuant to 603 CMR 44.04.</li> <li>b. At least half of the teaching staff shall be licensed in special education areas appropriate to the population served at the school; other teaching staff shall be licensed in other educational areas, in order to provide for content expertise in the general curriculum. The Department of Education may require a higher proportion of licensed special educators if, in the opinion of the Department, the population requires more specialized services.</li> <li>c. To the extent that teaching staff is providing special education services, such</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	services shall be provided, designed, or supervised by a special educator.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.5 Related Services Staff 28.09(7)(d)</b>	All staff providing or supervising the provision of related services shall be appropriately certified, licensed or registered by their respective state boards or professional associations and the Department of Education, when appropriate.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.6 Master Staff Roster 28.09(7)</b>	<p>The public/private special education program maintains a master list of ALL staff for <u>every</u> position within the program. This list must include job titles along with their corresponding UFR title numbers <u>for private programs</u>, and full-time equivalents (FTE's) for public and private programs. This list may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Administrators <ul style="list-style-type: none"> <li>▪ Special education teachers</li> <li>▪ General education teachers</li> <li>▪ Related services professional staff</li> <li>▪ Registered Nurse</li> <li>▪ Direct (child) care workers</li> <li>▪ Direct (child) care supervisors</li> <li>▪ Clerical and maintenance staff</li> <li>▪ Psychologist</li> <li>▪ Social worker</li> <li>▪ Food service staff</li> <li>▪ Consultants</li> </ul> </li> </ul>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.7 Job Descriptions 18.05(11)(d)</b>	Public/private special education program has written job descriptions for all staff positions that shall be made available to staff as well as parents, if requested.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.8 Salary Ranges 18.05(11)(e)</b>	The program shall establish in writing a salary range including benefits covering all positions and shall inform each employee of the same for his/her position.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.9 Organizational Structure 28.09(7) 28.07(c)</b>	The program shall demonstrate 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> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.10 Supervision of</b>	Each program shall provide ongoing and regular supervision of all childcare workers by a professional staff person who has supervisory and administrative responsibility within the school.

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>Child Care Workers (Direct Care Staff) 18.03(4)</b>	
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.11 Supervision of Students 28.09(7) 18.03(1)</b>	<p>The program shall develop and implement 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 must include 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> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.12 Accessibility of Extracurricular Activities  Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(a), (b); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.41; Section 504: 29 U.S.C. 794; 34 CFR</b>	<p>Extracurricular activities sponsored by the public/private special education program are nondiscriminatory in that:</p> <ul style="list-style-type: none"> <li>• The school provides equal opportunity for all students to participate in intramural and interscholastic sports</li> <li>• Extracurricular activities or clubs sponsored by the school do not exclude students on the basis of race, sex, color, religion, national origin, sexual orientation, disability, or homelessness</li> </ul>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>104.4,104.37(a), (c); Title II: 42 U.S.C. 12132; 28 CFR 35.130; NCLB: Title X, Part C, Sec. 721; Mass. Const. amend. art 114; M.G.L. c. 76, s. 5; 603 CMR 26.06</b>	
	<b>Rating: Commendable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**

*Based on a review of documentation, interviews and observations, all students, regardless of their race, sex, color, religion, national origin, sexual orientation, disability, homelessness, and, in particular, their physical challenges are able to participate in the wide variety of extracurricular activities offered at Cotting School.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>11.13 Plan for Staff Coverage 18.03(1)(b)4</b>	Each program must provide 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.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>



<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>Title VI: 42 U.S.C. 2000d; 34 CFR 100.3; EEOA: 20 U.S.C. 1703(f); Title IX: 20 U.S.C. 1681; 34 CFR 106.31-106.42; M.G.L. c. 76, s. 5; 603 CMR 26.00, esp. 26.07(2), (3)</b>	(51-A) and/or the Disabled Persons Protection Commission; b. Emergency first aid training by a certified instructor and, where specifically required by the Department of Education, certification in CPR; c. Medication administration (including, but not limited to, administration of antipsychotic medications and discussions of medications students are currently taking and their possible side effects); d. Runaway policy; e. Transportation safety (if applicable); f. Student record policies and confidentiality issues; g. Evacuation policies and emergency procedures including, but not limited to, utilization of the alarm system, evacuations in instances of fire or natural disaster; h. Behavior management policies and procedures used by the program such as positive reinforcement, point/level systems, token economies, time-out procedures; i. Restraint procedures including de-escalation methods used by the program; j. Curriculum alignment with the Massachusetts Curriculum Frameworks; k. Procedures for inclusion of all students in MCAS testing and/or alternate assessments; and l. Civil rights responsibilities.
	<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 (a) Details Behavior Management and Restraint Training 28.09(11) 18.05(5)</b>	Training on behavior management and suspension and termination procedures includes: a. Program's student conduct/discipline code b. Description of safeguards for students' emotional, physical, and psychological well-being c. Policies on use of time-out procedures d. Techniques for dealing with disruptive and violent behavior including skill training on the proper use of non-violent restraint e. Detailed procedures pertaining to the use of any type of restraint, which must meet or exceed any requirements in applicable state regulations or policy * f. Procedures for obtaining and recording data regarding student discipline and behavior along with a description of how such data will be integrated into IEP Team discussions g. Procedures for obtaining parental consent, if appropriate

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	*NOTE: OCCS residential regulations on behavior management, including restraint and time-out, are found at 102 CMR 3.07(7). The provisions relating to restraint are expanded in EOHHS/OCCS's "Guidelines for Physical Restraint" issued 1/11/00. DMH regulations regarding 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.)
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

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

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2(c) Details CPR Certification and Emergency First Aid Training 18.05(9)(e)</b>	The program shall develop 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: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2(d) Details Medication Training 18.05(9)(f)(3) (c)</b>	<p>Training by a physician or registered nurse shall be given to all staff who provide care and instruction to students receiving medication.</p> <p>The training shall include the nature of a medication, potential side effects and any special precautions or requirements.</p> <p>(Note: See requirements for health care manual, which must include policies and procedures on medication administration.)</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2(e) Student Record Training 28.09(10)</b>	<p>The public/private special education program shall train staff to keep current and complete files for each publicly funded enrolled student and shall train staff to manage such files consistent with the Massachusetts Student Record Regulations (603 CMR 23.00) and MGL c.71, s.34H.</p>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2(f) Emergency Procedures Training 18.05(10)</b>	<p>All staff shall be 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 shall conduct 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 which includes date, time elapsed, participants (students and staff), witnesses, etc.</li> </ol>
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>12.2(g) Interns and Volunteers Training 18.05(11)(i)</b>	If applicable, the training plan includes provisions for the orientation, training and supervision of interns, volunteers or others who work at the program.
	<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(h) Child Care Staff Development and Training 18.03(3)</b>	The public/private special education program shall develop and implement with staff input a detailed written plan for staff development and in-service training of all childcare workers.
	<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 (i) Staff Evaluations 18.05(11)(c)1.</b>	Written performance evaluations shall be scheduled and maintained for all staff as outlined in the program's Personnel Policy and Procedures Manual.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

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

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>13.1 Educational Facilities and Materials</b> <b>28.09(8)</b>	The public/private special education program shall provide the facilities, textbooks, equipment, technology, materials and supplies needed to provide the special education and related services specified on the IEP's of enrolled students. If specialized materials or equipment are needed solely for an individual student, the program may enter into an agreement for the provision of such materials or equipment by the school district enrolling the student.
	<b>Rating: Commendable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

*Based on a review of documentation, interviews and observations, Cotting School provides the facilities, textbooks, equipment, technology, materials and supplies needed to provide the special education and related services on the IEP's of enrolled students. Some examples of how Cotting goes above and beyond standard requirements are through their offering of technology, adaptive books, laptops, slant desks, talking books, Occupational Therapy equipment, Physical Therapy equipment, the art room, the music room, the on-site vision clinic, the on-site dental clinic and the library. Each of these components is well thought out and the materials used are from basic to advanced.*

CRITERION NUMBER	
	<b>Legal Standard</b>
<b>13.3 Comparability of Facilities</b>  <b>Title VI: 42 U.S.C. 2000d; 34CFR 100.3(b)(2); Title IX: 20 U.S.C. 1681; 34CFR 106.33,106.40 (b)(3); Section504: 29]U.S.C. 794; 34CFR 104.34(c); Mass. Const. amend. art. 114; 603 CMR 28.03(1)(b)</b>	Where the public/private special education program provides separate facilities for members of a specific group, those facilities are comparable to those offered other students in the program, including: <ul style="list-style-type: none"> <li>• Separate facilities for disabled, limited English proficient or pregnant students that are comparable to the facilities for other students in the program; and</li> <li>• Separate toilet, locker room, and shower facilities for students of one gender that are comparable in size, condition, number and location to those provided to students of the other gender.</li> </ul>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>13.4 Physical Facility/Architectural Barriers 18.04(8)</b>  <b>Section 504: 29 U.S.C. 794; 34 CFR 104.21,104.22 ; Title II: 42 U.S.C. 12132; 28 CFR 35.149, 35.150; Mass. Const. amend. art. 114</b>	<p>The public/private special education program shall assure 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>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>13.4 (a) Kitchen, Dining, Bathing/ Toilet,and Living Areas 18.04(2),(3), (4),(5)</b>	<p>The public/private special education program shall ensure 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</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	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; and d. Post a list of student food allergies in all appropriate areas of the residence.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>13.5 Classroom Space 18.04(6)(a)</b>	Each room or area that is utilized for the instruction of students shall be adequate with respect to the number of students, size and age of students and students' specific educational needs, physical capabilities and educational/vocational activities.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>13.6 Library/ Resource Room 18.04(6)(b)</b>	In addition to the regular instructional area, the school shall have 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>Rating: Commendable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**

*Based on a review of documentation, interviews and observations, Cotting School has a library that includes a variety of materials appropriate to the age and abilities of the students enrolled. The bookshelves are low so that they are accessible to students in wheelchairs, they offer high interest low vocabulary materials, there are literature and instructional materials and all of the resources are cataloged. The student classrooms have library specific times and the students also choose to use the library at other times. A resource room is available to staff and families.*



**AREA 14: REQUIREMENTS FOR DAILY CARE**

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>14.1 Clothing, Grooming and Hygiene 18.03(5)</b>	The school shall make provisions with parents or, where appropriate, state agencies to assure that all students are provided with clean, appropriate and seasonal clothing as well as with personal grooming and hygiene articles and materials necessary to meet his/her individual needs.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>14.2 Food and Nutrition 18.03(7)</b>	The school's staff shall understand the nutritional requirements of the students enrolled and provide an appropriate number of meals daily (three meals daily for residential programs), at reasonably appropriate times, which constitute a nutritionally adequate diet.
	<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 Toileting Procedures and Individual Plans 18.03(8)</b>	<p>The public/private special education program shall develop and implement 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 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>



CRITERION NUMBER			
	<b>Legal Standard</b>		
<p><b>15.3</b></p> <p><b>Information to be Translated into Languages other than English</b></p> <p><b>Title VI; EEOA: 20 U.S.C. 1703(f); M.G.L. c. 76, s. 5; 603 CMR 26.02(2)</b></p>	<p>When students have parents or guardians with limited English language skills, the public/private special education program ensures that general announcements and notices of extracurricular activities and other opportunities are distributed to them in the primary language of the home.</p>		
	<b>Rating: Implemented</b>	<b>RESPONSE REQUIRED:</b>	<b>No</b>

CRITERION NUMBER			
	<b>Legal Standard</b>		
<p><b>15.4</b></p> <p><b>Change of Student's Legal Status</b></p> <p><b>18.05(4)(b)</b></p>	<p>The school shall have procedures for assuring that it is informed by a parent or guardian of any changes in a student's legal status, and of the results of all judicial and administrative proceedings concerning the student.</p> <p>The school shall have written procedures for disseminating this information to appropriate personnel.</p>		
	<b>Rating: Implemented</b>	<b>RESPONSE REQUIRED:</b>	<b>No</b>

CRITERION NUMBER			
	<b>Legal Standard</b>		
<p><b>15.5</b></p> <p><b>Parent Consent</b></p> <p><b>28.07(1)(b)</b></p>	<p>The program shall notify the placing school district when multiple efforts have been made, yet have failed to involve the parent and obtain necessary parental consent.</p> <p>Matters requiring parental consent include, but are not limited to, the following:</p> <p>a. In coordination with responsible school districts, IEP-related matters</p>		

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<ul style="list-style-type: none"> <li>b. Emergency medical care</li> <li>c. Medications</li> <li>d. Restraints</li> <li>e. Publicity, research, evaluation</li> <li>f. Field trips</li> <li>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>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>15.6 Student Involvement 34CFR 300.344</b>	The program shall collaborate 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.
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>15.7 Consent at Age of Majority 28.07(5)</b>	<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>• The parent or other legally eligible party has petitioned and been appointed guardian by a court of competent jurisdiction</li> <li>• The student chooses to share decision-making with his or her parent</li> <li>• 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>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

CRITERION NUMBER	
	<b>Legal Standard</b>
<p><b>15.8 Registering Complaints 18.05(1)(b)16</b></p> <p><b>Title IX: 20 U.S.C. 1681; 34 CFR 106.8; Section 504: 29 U.S.C. 794; 34 CFR 104.7; Title II: 42 U.S.C. 12132; 28 CFR 35.107; NCLB: Title X, Part C, Sec. 722(g)(1)(J)(ii)</b></p>	<p>The public/private special education program shall develop and make available to parents and students a set of written procedures that may be used to register complaints regarding the student’s education and care at the school.</p> <p>The public/private special education program must also adopt and publish grievance procedures for students and for employees providing for prompt and equitable resolution of complaints alleging discrimination based on sex or disability.</p>
	<p><b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p>

<b>AREA 16: HEALTH AND MEDICAL SERVICES</b>
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CRITERION NUMBER	
	<b>Legal Standard</b>
<p><b>16.1 Health care Policy and Procedure Manual 18.05(9)(d) 18.05(9)(c)</b></p>	<p>The school shall have a comprehensive, written health care policies and procedures manual that clearly describes provisions made for medical, nursing and infirmary care of students. This manual must be approved by a licensed physician, include all applicable policies and procedures, and be 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>
<b>16.2 Physician Consultation 18.05(9)(a)</b>	The school shall secure the services of a licensed physician available for consultation.
	<b>Rating: Implemented</b> <b>RESPONSE REQUIRED: No</b>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>16.3 Nursing 18.05(9)(b)</b>	The school shall secure 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.
	<b>Rating: Commendable</b> <b>RESPONSE REQUIRED: No</b>

**Department of Education Findings:**

*Based on a review of documentation student records, interviews and observations, the nursing staff are available to meet every anticipated medical need as evidenced by the physical facility and the protocols they follow for very medically involved and fragile students.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>16.4 Emergency First Aid 18.05(9)(e)</b>	The school shall have written policies and procedures for emergency first aid and care including: <ul style="list-style-type: none"> <li>a. Training of all direct service staff by a certified instructor in 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.</li> <li>c. Storage of and easy access to first aid supplies and health care policies and procedures in major activities areas;</li> <li>d. Posting of telephone numbers for the fire department, police station, poison prevention center, hospital emergency room and ambulance service serving</li> </ul>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>the school in living quarters and educational facilities;</p> <ul style="list-style-type: none"> <li>e. Procedures to be followed in the case of illness or emergency such as motor vehicle accident, including methods of transportation and notification of parents;</li> <li>f. Procedures to be followed in the case of fire or other emergency;</li> <li>g. Procedures for informing parents of any medical care administered to their child or of any injury or illness that requires care other than basic first aid; and</li> <li>h. Procedures to be followed in the case of illness or emergency if parents cannot be reached.</li> </ul>
	<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><b>16.5 Administration of Medication 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 prescription and administration 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.</li> <li>g. The school shall dispose of or return to the parents any unused medication.</li> <li>h. Medications must be delivered to the school by a responsible adult in a container labeled by the physician or pharmacist.</li> <li>i. Provisions must be made for refrigeration of medications, when</li> </ul>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>necessary.</p> <p>j. 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.</p> <p>k. A review of medications administered to a student shall be incorporated into all progress reviews conducted for the student.</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><b>16.6 Administration of Antipsychotic Medication 18.05(9)(f)(9)</b></p>	<p>The school shall 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>d. 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>e. 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>f. In an emergency situation, antipsychotic medication may be administered for treatment purposes without parental consent or prior</li> </ol>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
	<p>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).</p> <p>g. The school shall inform a student twelve years of age and older, consistent with the student's capacity to understand, about the treatment, risks and potential side effects of such medication. The school shall specify and follow procedures if the student refuses to consent to administration of the medication.</p>
	<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><b>16.7 Preventive Health care 18.05 (9)(f)(9)(h)</b></p>	<p>The school shall develop and implement a written plan for the preventive health care of students that includes, but is not limited to the following:</p> <ul style="list-style-type: none"> <li>a. Provisions for each student to receive an annual comprehensive medical and dental examination;</li> <li>b. Vision, hearing, postural and other required screenings conducted in accordance with M.G.L. c.71 s.57;</li> <li>c. Provisions ensuring that all students are immunized as required by the Department of Public Health;</li> <li>d. Procedures for communicable disease notification and prevention of students and staff;</li> <li>e. 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>f. Provision of a locked, secure cabinet to keep all toxic substances, medications, sharp objects and matches out of the reach of students;</li> <li>g. Medications and medical supplies are not locked in the same cabinet as other toxic substances. Toxic substances are labeled with contents and antidote and the phone number for the nearest poison center is posted clearly.</li> <li>h. Provisions of family planning information, subject to any applicable state or federal legislation; and</li> <li>i. Procedures for protecting students from exposure to foods, chemicals, or other materials to which they are allergic.</li> </ul>
	<p><b>Rating: Commendable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span></p>

**Department of Education Findings:**

*Based on a review of documentation, interviews and observations, Cotting School has on –site vision and dental clinics that meet the needs of the students. Students benefit from this approach because they are then properly assessed in a familiar environment and experience minimal disruptions to their instructional time.*

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>16.8 Receipt of Medical Treatment- Religious Beliefs</b>	In the absence of an emergency or epidemic of disease declared by the Department of Public Health, the school shall not require any student to receive medical treatment when the parents object thereto on the ground that such treatment conflicts with a religious belief.
<b>18.05(9)(k)</b>	
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**AREA 17: TRANSPORTATION SAFETY**

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>17.1 Transportati on Safety 28.09(11)(b)</b>	<p>The program develops transportation procedures that ensure that 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 students’ needs and provisions of their IEPs. In the event of a motor vehicle accident, parents, school districts, human service agencies, and the Department of Education are notified immediately.</p> <p>The school ensures that <u>any</u> person who is responsible for operating a vehicle owned or contracted for by the school which carries students shall receive in-service training on overall transportation safety and the individual needs of the students they transport.</p>
	<b>Rating: Implemented</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**AREA 18: STUDENT RECORDS**

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>18.1 Student Records 28.09(10)</b>	Approved special education schools shall keep current and complete files for each publicly funded enrolled Massachusetts student and shall maintain 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>

<b>CRITERION NUMBER</b>	
	<b>Legal Standard</b>
<b>18.2 Student Records (Log of access and face sheet information) 28.09(10)</b>	<p>Student records shall be legibly dated and signed by persons making entries. Individual access logs shall be maintained for each record. All records must contain:</p> <ol style="list-style-type: none"> <li>a. Log of access consistent with requirements of the Massachusetts Student Record Regulations</li> <li>b. Face sheets updated at least annually with the following information: <ul style="list-style-type: none"> <li>o Name</li> <li>o Date of birth</li> <li>o Recent picture</li> <li>o Date of admission to private school</li> <li>o Name of educational case manager assigned by the public/private school program</li> <li>o Location of residential service within facility (if applicable), and name of residential case manager or supervisor</li> <li>o Date initially eligible for special education (if known)</li> <li>o Date of most recent special education evaluation(s)</li> <li>o Date of next expected 3-year reevaluation</li> <li>o Starting and expiration dates of current (or most recent) IEP</li> <li>o Primary language of student</li> <li>o Legal status of student</li> <li>o If under 18: in custody of both parents, one parent [specify], legal guardian [specify], other [specify]</li> <li>o If 18 or over: makes own decisions; under legal guardianship [specify]; has shared role with parent in education decisions [specify]</li> <li>o Other state agency/ies involved with student</li> <li>o Parent/guardian contact information: names, addresses, home &amp; work telephone numbers, e-mails</li> <li>o Primary language of parents/guardian</li> </ul> </li> </ol>

CRITERION NUMBER	
	<b>Legal Standard</b>
	<ul style="list-style-type: none"> <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>○ Notation of allergies and/or any other medical condition affecting student's well-being (e.g., seizures)</li> <li>○ Information specific to the student regarding the handling of medical emergencies</li> </ul> <ul style="list-style-type: none"> <li>c. Copy of current IEP</li> <li>d. Copies of quarterly progress reports and any modification of the IEP</li> <li>e. Copy of the student's termination or discharge plan</li> <li>f. Health records, including reports, documentation of physical examinations, allergies, screening tests, results of medical care</li> <li>g. All evaluations or assessments conducted of the student</li> <li>h. Pertinent correspondence concerning the student</li> <li>i. Information regarding the use of behavior management interventions including, but not limited to, restraint (chemical, mechanical, physical) and time-out procedures</li> <li>j. Copies of all incident reports</li> </ul>
	<b>Rating: Commendable</b> <span style="float: right;"><b>RESPONSE REQUIRED: No</b></span>

**Department of Education Findings:**

*Based on a review of student records and interviews, Cotting School maintains student records in a well-organized and complete manner. Information is clearly labeled and thorough. Records contained all required elements for all student records reviewed.*

PRIVATE SCHOOL PROGRAM REVIEW REPORT 2005.doc

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