



The Commonwealth of Massachusetts Department of Education

350 Main Street, Malden, Massachusetts 02148-5023

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

January 21, 2005

Anne Carol-Malone
26 Sunnyside Street
Jamaica Plain, Ma 02130

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

Dear Ms. Carol-Malone:

Enclosed is the Department's Program Review Follow-up Monitoring Report together with findings regarding your private school's Mid-Cycle Program Review. This report contains the Department's findings based on the onsite activities conducted in your school to verify the implementation status and effectiveness of corrective steps taken in response to your Program Review Report issued on June 12, 2002. This report also includes a report on the status of implementation for new state or federal special education requirements enacted since your school's last Program Review.

While the Department of Education found certain noncompliance issues to be resolved, others were partially corrected, not addressed at all and/or new issues were identified by the Department's onsite team. Therefore, the Department is issuing a "Provisional Approval" status effective from the date of this letter and indicated on your approval certificate. Your "Provisional Approval" will expire on April 21, 2005. The reasons for the "Provisional Approval" are clearly indicated on the attached Corrective Action Plan Implementation Checklist.

As the Department previously informed you, in cases where a private school fails to fully and effectively implement a Corrective Action Plan which was proposed by your school and approved by the Department, the Department must then prepare a Corrective Action Plan for the school which must be implemented without further delay. You will find these requirements for corrective action and further progress reporting included in the attached report together with any steps that must be taken by the school to fully implement new special education requirements. Please provide the Department with your written assurance that the Department's requirements for corrective action will be implemented by your private school within the timelines specified. Your statement of assurance must be submitted to the Department's Onsite Chairperson by February 10, 2005.

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

Sincerely,

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

John D. Stager, Administrator
Program Quality Assurance Services

c: David P. Driscoll, Commissioner of Education
John Lydon, Program Director

Encl.: Follow-up Monitoring Report

**MASSACHUSETTS DEPARTMENT OF EDUCATION
PROGRAM REVIEW**

Compass School

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

**Action Plan Submitted on July 2002
Progress Reports Submitted on 10/02, 12/02, 3/03, 4/03
Onsite Visit Conducted on November 18, 19 2004
Date of this Report January 21, 2005**

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1.3 Program's Curriculum 28.09(9)	√	Documentation Review and Observations	Compass School has provided the Department with a description of the program's curriculum and staff qualifications.			
2.2 Approvals, Licenses, Certificates of Inspection 28.09 (2)(b)4-5	√	Documentation review	Compass School has provided the Department with all required licenses and certificates of inspection.			

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28.09(5) 28.09(6) 18.04(1) 102 CMR 3.06 (4)(b)	√					
2.3 OCCS Licensure (Not Applicable to Day Schools)	Not Applicable					
3.1 Policies and Procedures Manual Formally 3.3	√	Documentation Review			Compass School's Policy and Procedure Manual is disorganized and hard to read with policies randomly inserted. A notice needs to be sent out to parents that the policy book is available for them to view.	By February 18, 2005 Compass will have revised its Policy and Procedure book so that is organized and policies and procedures are easy to look up and read. A notice needs to be sent to parents and/or guardians that the policy and procedure book is readily available for their viewing.
4.4 Advanced	√	Documentation Review	Compass School has provided the Department with required			

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Notice of Program/ Facility Change 28.09(5)(c)	√		notifications. Compass needs to maintain awareness of its student census so that when it fluctuates by more than 5 students, the school informs the Department with Form 1 notification.	√		
4.5 Immediate Notification 18.03(10) 18.05(7) 28.09(12)	√	Documentation Review and Interview	Compass notifies the Department of all required serious incidents utilizing the Department's Form 2.			
5.2 Policies and Procedures for Coordination/ Collaboration with Public School Districts	√	Documentation Review and Interviews	Compass School has policies/procedures that describe the roles and responsibilities of all staff regarding the coordination and collaboration with public school districts.			

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& Content requirements policies/procedures for Coordination/ Collaboration with Public School Districts 28.06(2-3) 28.09(9)(c)&(d) 28.09(2)(b)7 Federal Regulations: 300.349 and 300.400-.401 (Formally 5.3)	√					
6.1 Daily	√	Documentation Review and	Compass School provides the required average annual			

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Instructional Hours 603 C.M.R. 27.00		Observations	minimum hours of instruction for its secondary students.			
6.2 School-to-work (Instructional hours) 603 CMR 27.02, 27.04	Not Applicable					
6.3 Kindergarten (Instructional hours) 603 CMR 27.03(5)	Not Applicable					
6.4 School Days per Year 28.09(9)	√	Documentation Review	Compass School provides the required number of school days for its 12-month program.			
6.5 Early Release of	Not Applicable					

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High School Seniors 603 CMR 27.05	√					
7.1 Curriculum Frameworks 28.09(9)(b)				√	Compass School has developed curriculum that correspond with the Massachusetts Curriculum Frameworks, however, none of the subject area curriculum are detailed enough to be effective tools for teaching.	By March 10, 2005 Compass School will show substantial progress towards creating more comprehensive curriculum across subject areas that is aligned with the Massachusetts Curriculum Frameworks.
7.3 State/District Wide Assessments 28.09(9)(d)	√	Documentation and Student Record Review	All enrolled students participate in state and/or district wide assessment in accordance with each student's IEP.			
8.2 Implementation Related	√	Documentation and Student Record	All students are receiving the related services required in their IEP's.			

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Services (Formally 8.6)	√	Review		√		
8.4 Current IEP & Student Roster 28.09 (Formally 8.6 and 8.8)	√	Documentation and Student Record Review	Compass School has a current IEP for each of its enrolled students both in the long-term and short-term programs.			
8.8 IEP Progress Reports (Formally 8.7)		Documentation and Student Record Review		√	Progress Reports often do not discuss the annual goal or whether the student is making progress toward meeting this goal. A review of student records revealed that many of the written IEP goals were not measurable or annual and were not developed based upon the individual needs of the student. The	By March 10, 2005 Compass School needs to revise its progress reports and submit a sample revised report which includes all required elements. The progress reports need to show accurate reflections of student progress toward annual goals and whether it looks like the student will meet his or her IEP goals in the IEP period. By February 18, 2005

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	√			√	student records often do not include documentation that progress reports were sent to parents or school districts.	Compass School will provide a timetable for when it will train its staff on accurate progress report writing. By February 18, Compass School will provide documentation that parents and school districts are receiving timely copies of progress reports.
8.9 IEP- Less Restrictive Placement 28.09(9(c)) (Formally 8.8)	√	Documentation Review and Interviews	Compass School has a plan for ensuring that there are procedures in place that maximize opportunities for enrolled students to gain the capacity to return to a less restrictive educational program.			
9.3		Documentation	Compass School has an			

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Runaway Students Formally 9.3	✓	n Review and Interviews	appropriate policy for handling runaways.	✓		
10.1 Student:Teacher Ratios 28.06(6)(d)&(g) 28.09(7)(e)	✓	Documentatio n Review and Observation	Compass School's is in full compliance with the required student/teacher ratios.			
10.2 Age Range Formally 10.2	✓	Documentatio n Review and Observation	Compass School's instructional groupings do not exceed 48 months.			
10.4 Student: Child Care Ratios 28.09(7) 18.01(2)	Not Applicable					
11.1 Personnel Policies	✓	Documentatio n Review	Compass School has developed personnel policies that include all required			

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28.09(7) 28.09(11)(a) 18.05(11)	✓		elements.			
11.3 Educational Administrator Qualifications 28.09(7)(a) 603 CMR 44.00 and 44.04				✓	The qualifications for the Compass School Educational Administrator were not submitted.	By February 18, 2005 Compass will submit the qualifications for the Educational Administrator.
11.4 Teachers Special Education Teachers and Regular Education Teachers 28.09(7)(b)(c) 18.05(11)(f)				✓	Teacher Licenses and/or waivers are incomplete and several teachers are not licensed or on an approved waiver. There are six classrooms but only four teachers on the master staff roster. One teacher, NC, is listed on the master staff roster as a teacher assistant but is	By February 18, 2005 Compass needs to submit an accurate list of its teachers, which class they are teaching and all licensure and/or waiver information.

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	√			√	listed in 11.4 as a teacher; no information was found on this individual's licensure status. Compass also has a substitute teacher who is listed but no information is included on what he teaches, how often or any other licensure information.	
11.5 Related Services Staff 28.09(7)(d)	√	Documentation Review	All related services staff are appropriately certified.			
11.6 Master Staff Roster 28.09(7)				√	The Master Staff roster must include appropriate licensure and/or certification information for teachers, clinical staff and appropriate administrators.	By February 18, 2005 please provide all appropriate licensure and/or certification information for all teaching, clinical and relevant administrative staff.

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11.7 Job Descriptions 18.05(11)(d)	√	Documentatio n Review	Compass School has written job descriptions for all staff positions.	√		
11.8 Salary Ranges 18.05(11)(e)		Documentatio n Review		√	Compass School has provided salary ranges for all of its teaching staff, but needs to provide salary ranges for all positions.	By February 18, 2005 Compass will submit salary ranges for all positions.
11.9 Organizational Structure 28.09(7) 28.07(c)	√	Documentatio n Review, Interviews, and Observations	Compass School's organizational structure provides for the efficient and effective operation of the school.			
11.11 Supervision of Students 28.09(7) (Formally 11.12)	√	Documentatio n Review, Interviews, and Observations	Compass School has developed a plan for the appropriate supervision of the students and has procedures in place for how staff coverage will be maintained in the case of staff absence			

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<p>11.12 Accessibility of Extracurricular Activities</p> <p>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 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.</p>	<p>√</p>	<p>Documentation Review and Observation</p>	<p>Compass School provides an equal opportunity for all students to participate in extracurricular activities including sports in a nondiscriminatory manner.</p>	<p>√</p>		

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amend. art 114; M.G.L. c. 76, s. 5; 603 CMR 26.06	√			√		
12.2 Annual In-Service Training Plan and Calendar 28.09(7)(f) 18.05(11)(h) Formally 7.2 and 12.2(h)				√	Compass needs to provide the date, time and name of the trainer for all required annual topics. Also, Compass needs to provide MCAS training and Massachusetts Curriculum Frameworks training to all staff not just teachers.	By February 18, 2005 Compass will submit to the Department a copy of its annual training schedule with the topic, date, time, and name of trainer. This training schedule must include dates for training all staff on MCAS and Massachusetts Curriculum Frameworks.

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13.3 Comparability of Facilities Title VI: 42 U.S.C. 2000d; 34 CFR 100.3(b)(2); Title IX: 20 U.S.C. 1681; 34 CFR 106.33, 106.40(b)(3); Section 504: 29 U.S.C. 794; 34 CFR 104.34(c); Mass. Const. amend. art. 114; 603 CMR 28.03(1)(b)	√	Documentation Review and Observation	Compass School does not provide separate facilities for members of any group at its school.	√		

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14.3 Toileting Procedures and Individual Plans Formally 14.3	√	Documentation Review	Compass School has developed an appropriate toileting plan for its student population.			
15.1 Parental Involvement and Parents' Advisory Group 18.05(4)(a)	√	Documentation Review	Compass School has developed a written plan for involving parents.			
15.3 Information to be translated into Languages other than English Title VI; EEOA: 20 U.S.C. 1703(f); M.G.L.	√	Documentation Review and Interview	Compass School ensures that parents or guardians with limited English language skills are given general announcements and notices in their primary language.			

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c. 76, s. 5; 603 CMR 26.02(2)	√			√		
15.4 Change of Student's Legal Status (Formally 15.3)	√	Documentation Review	Compass School has written procedures in place for assuring that it is informed by a parent or guardian of any changes in a student's legal status.			
15.8 Registering Complaints 18.05(1)(b)16 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,	√	Documentation Review	Compass School has developed and will make available to parents and students a set of written procedures that they may use to register complaints regarding the student's education and care. Compass School has also developed grievance procedures for students and employees for complaints alleging discrimination based on sex or disability.			

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Part C, Sec. 722(g)(1)(J)(ii) (Formally 15.7)	✓			✓		
16.7 Preventative Health Care Formally 16.7	✓	Documentation Review	Compass School has provided the Department with written documentation on how it provides vision, postural and other required screenings.			
17.1 Transportation Safety Formally 17.1	✓	Documentation Review	Compass's transportation policy includes all of the required notification procedures.			
18.2 Student Records 28.09(10) MGL c. 71, s. 34H 603 CMR 23.00 Family		Student Record Review		✓	Student Records are incomplete. The following documents are not being consistently maintained by the school: <ul style="list-style-type: none"> • Incident reports • Relevant correspondence 	By February 18, 2005, Compass will submit a plan for revising its student records so that they come into compliance with the current requirements. The Department will conduct an on site visit to review student records on or/following April 15, 2005.

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Educational Rights and Privacy Act (FERPA)					<ul style="list-style-type: none"> • Progress Reports 	