



The Commonwealth of Massachusetts Department of Education

350 Main Street, Malden, Massachusetts 02148-5023

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January 28, 2005

Ms. Barbara Brown, CEO
Amego, Inc.
115 Plymouth St.
Mansfield, MA 02048

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

Dear Ms. Brown:

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 action steps taken in response to your Program Review Report issued on November 9, 2001. 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 **June 31, 2005**. The reasons for the "Provisional Approval" are clearly indicated on the attached Corrective Action Implementation Checklist.

As the Department previously informed you, in cases where a private school fails to fully and effectively resolve issues of noncompliance, the Department must then prepare a Corrective Action Plan for the school that 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 9, 2005**. Please see specific corrective action requirements and related timelines that must be documented to the Department. Pending the outcome of review of these documents, the Department will determine whether or not to notify Amego, Inc. of sanctions in the form of "Probationary Approval" status and/or a closing of the

private school's intake in consideration of the continuing noncompliance that has again been documented by the Department.

The findings described the enclosed oversight report indicate that Amego, Inc. (the school) does not meet the minimum standards as required by Board of Education regulations and Department program approval standards. The Department originally notified the school of these areas of noncompliance as result of this agency's Program Review conducted in 2001, and the Department has now documented that the school has failed to implement fully and effectively any corrective action regarding these 2001 citations of noncompliance.

In consideration of the Department's findings of persistent noncompliance at the school, the Department will hold a meeting in its Malden offices within the next 20 days of the date of this letter to discuss the steps it will take to ensure that Amego, Inc. complies with the law. We urge you to attend this meeting in order that you may understand fully the basis of actions the Department is obligated to take to enforce the law. Please contact the Department without delay regarding your intentions to attend this meeting and the dates that are convenient for you. During this meeting we invite any questions you may have regarding the Department's findings, and we look forward to discussing with you the school's implementation strategies for the required corrective action ordered by the Department that are intended to remedy the noncompliance documented in the enclosed report.

The Department is advising you that at its discretion it will continue to conduct announced and unannounced site visits to the school and its student residences to document the effectiveness of corrective action required by the Department of Education. It is our desire to work positively and collaboratively with Amego, Inc. to ensure compliance with all Department requirements and to support the school in its efforts to meet the challenging needs of the students it serves. If you have any questions regarding these requirements, please contact Carolyn Wilson at 781-338-3713 or Kevin Bobetich at 781-338-3746.

Sincerely,

Kevin Bobetich, Program Review Follow-up Chairperson
Program Quality Assurance Services

John D. Stager, Administrator
Program Quality Assurance Services

C: David P. Driscoll, Commissioner of Education

Caryn Goldberg, Coordinator of Private School Approval
Carolyn Wilson, Private School Team

Encl.: Follow-up Monitoring Report

**MASSACHUSETTS DEPARTMENT OF EDUCATION
PROGRAM REVIEW**

Amego, Inc.

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

Onsite Visit Conducted on October 28-29, 2004

Date of this Report January 28, 2005

<p style="text-align: center;">Criterion Number and Topic</p>	<p style="text-align: center;">Implementation Status of Requirements or Corrective Action Determined to be <u>Substantially Implemented</u></p>	<p style="text-align: center;">Method(s) of Verification</p>	<p style="text-align: center;">Comments Regarding Corrective Action Implementation</p>	<p style="text-align: center;">Corrective Action Determined to be <u>Not Fully Implemented</u> or <u>Additional Issues Identified</u></p>	<p style="text-align: center;">Findings Regarding Incomplete Implementation of Approved Corrective Action or Identification of Additional Issues of Noncompliance</p>	<p style="text-align: center;">Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting</p>
<p style="text-align: center;">1.3 Program's Curriculum 28.09(9)</p>	<p>√</p>	<p>Documentation, Staff Interviews</p>		<p>√</p>	<p>A review of documentation revealed that the program has only developed the English Language Arts framework area. The school has not developed a curriculum that is aligned to all curriculum areas of the Massachusetts Curriculum Frameworks.</p>	<p>The school must develop a curriculum that addresses all curriculum areas of the Massachusetts Curriculum Frameworks. A completed curriculum must be submitted by August 1, 2005, which must be implemented during the 2005-2006 school year.</p> <p>Monthly written progress reports must be submitted to the Department on the 1st of every month documenting the progress the school is making on completion of this project.</p>

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<p>2.2 Approvals, Licenses, Certificates of Inspection 28.09 (2)(b)4-5 28.09(5) 28.09(6) 18.04(1) 102 CMR 3.06 (4)(b)</p>	√	Documentation		√	Amego has not provided the Department with the proper licenses, approvals, and certificates as required under criterion 2.2.	By <u>March 30, 2005</u> all required licenses, and inspections must be submitted for all facilities utilized by the school program.
<p>2.3 OCCS Licensure (Not Applicable to Day Schools)</p>	√	Documentation	Amego has provided the Department with a current OCCS license for the residences utilized by children enrolled in the residential school program.			
<p>3.1(a) Policies and Procedures manual-Contents</p>		Documentation		√	A review of Amego's current Policy and Procedure Manual revealed Amego uses the contract with employees	Amego must develop a complete policy and procedure manual that includes all required policies by <u>August 1, 2005</u> . The school must submit

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	√			√	for this purpose. As a result, the manual does not contain the required policies and procedures.	<p>monthly progress reports on the <u>1st of each month</u> detailing the steps the school is taking to implement this criterion.</p> <p>In addition, once the Policy and Procedure Manual is complete, the school must notify all staff, parents and sending school districts that this manual is available for review.</p>
3.2 Health Care Manual 18.05 (9)(d)	√	Documentation	Amego has developed a Health Care Manual.	√	A review of Amego's current Health Care Manual revealed that the current manual is missing the policy for preventive health care. In addition, a licensed physician has not approved the manual.	Amego must develop a Health Care Manual that includes all required policies and procedures and is approved by a licensed physician by <u>August 1, 2005</u> . Monthly progress reports must be submitted on the <u>1st of each month</u> detailing the steps the school is taking to implement this criterion.

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4.2 Public Information and Postings 28.09(6)(a, b, c, d, e) 28.09(20(b)(4))	√	Observation		√	Amego has not made available for public review the required postings. This was a citation from the program review report that Amego has not remedied.	By <u>March 30, 2005</u> , all required postings must be available for public review. The Department will conduct an on-site visit to ensure that these documents have been posted.
4.4 Advanced Notice of Program/ Facility Change 28.09(5)(c)	√	Staff Interviews, Observations		√	Amego has not developed a policy and procedure to ensure that the Department of Education is notified of all substantial changes through a Form 1. Specifically, Amego did not notify the Department of the addition of the Tiffany Street residence, the addition of the APE teacher, and the move to the Plymouth Street location as required by a Form 1 notification.	Amego must develop a policy and procedure for notification of substantial changes that ensures that the Department of Education is notified of all changes within the program. This policy must be included in the Policy and Procedure Manual to be submitted <u>August 1, 2005</u> . Amego must also submit written assurances to the Department by <u>March 30, 2005</u> stating that the Department of Education will

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	√			√		be notified prior to any significant changes within the approved school.
4.5 Immediate Notification 18.03(10) 18.05(7) 28.09(12)	√	Student Records, Documentation	Amego has developed a policy for notifying the Department of Education for serious incidents. This policy must be included in the Policy and Procedure manual to be submitted <u>August 1, 2005.</u>			
5.1 Student Admissions 28.09(11)	√	Staff Interviews, Student Records	Staff interviews indicate that the student population contains a variety of disabilities to be addressed through behavioral programming.	√	Documentation review revealed that the admissions policy does not clearly state the type of student that Amego accepts.	A clear admissions policy that describes the population served must be developed and included in the Policy and Procedure Manual to be submitted <u>August 1, 2005.</u>
5.2 Policies and Procedures for Coordination/ Collaboration with Public School Districts &	√	Documentation Staff interviews	Amego has a policy and procedure for coordination and collaboration with public school districts.	√	Amego has developed a policy and procedure for coordination and collaboration with Public School Districts but this policy needs to be more specific as to the roles and responsibilities for implementing the policies	An updated policy that reflects the current laws and regulations must be developed and included in the Policy and procedure Manual to be submitted <u>August 1, 2005.</u>

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Contents of Coordination/ Collaboration With Public School Districts 28.06(2-3) 28.09(9)(c)&(d)) 28.09(2)(b) 7 Federal Regulations: 34 CFR 300.349 and 300.400-401	√			√	and procedures. Additionally, the policies and procedures do not meet all of the criteria required under state and federal laws.	
6.1 Daily Instructional Hours 603 C.M.R. 27.00	√	Documenta- tion	Amego provides students with six hours of instruction per day.			

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6.2 School to Work 603 CMR 27.02, 27.04	Not Applicable					
6.3 Kindergarten 603 CMR 27.03(5)	Not Applicable					
6.4 School Days per Year 28.09(9)	√	Documentati on	Amego operates 250 school days per year.			
6.5 Early Release of High School Seniors 603 CMR 27.05	Not Applicable					
7.1 Curriculum	√	Documenta- tion	Amego has aligned the Language Arts Curriculum with	√	Amego has not aligned all parts of its curriculum	See Criterion 1.2

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Frameworks 28.09(9)(b)			the Massachusetts Curriculum Frameworks.		with the Frameworks in order to ensure that students have access to the essential learning opportunities to prepare them for graduation.	
7.2 Staff Training 28.09(9)(b)	√	Staff Interviews Personnel Files	A review of personnel files revealed that some teaching staff has received training on Massachusetts Curriculum Frameworks.	√	While some teachers have received some training, not all staff has received required training in order to understand the general curriculum expectations and learning standards of the Massachusetts Curriculum Frameworks.	All staff must receive annual training on the Massachusetts Curriculum Frameworks. This training must occur by August 1, 2005. A copy of the training agenda, name of trainer, dates of training and attendance sheets must be submitted <u>August 1, 2005.</u> In addition, the Department will verify at each annual update that all staff working in the approved Department of Education school receives annual training on the Massachusetts Curriculum Frameworks.

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7.3 State District-Wide Assessments 28.09(9)(d)	√	Student Records, Documentation	Amego ensures that all students participate in state and district wide assessments.	√	Although students at Amego participate in the MCAS, the school has not developed the required written policies and procedures for the implementation of MCAS.	A policy and procedure for the administration of MCAS must be developed that includes all the requirements of this criterion. This policy must be included in the Policy and Procedure Manual to be submitted <u>August 1, 2005</u> .
8.5 Current IEP & Student Roster 28.09	√	Student Records, Documentation	Amego submitted a student roster that contains all required information.			
8.8 IEP Progress Reports 28.07(3) 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)(√	Student Records	Amego sends quarterly progress reports to all appropriate parties.	√	Student record review indicated that progress reports are being sent to appropriate parties, but they do not contain all of the required information. Specifically, written information on the student's progress on the annual goals from the IEP	Amego must provide training for all teaching staff on writing student progress reports by <u>March 30, 2005</u> . This training must include the specific information that must be included in all quarterly progress reports. Copies of the training agenda as well as the staff sign in sheets must be

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viii) 34 CFR 300.347	√			√	including information on the extent to which such progress is sufficient to enable the child to achieve the goals by the end of the IEP period.	submitted to the Department by <u>March 30, 2005.</u> A policy and procedure for the completion of quarterly progress reports must be developed and included in the Policies and Procedures Manual to be submitted <u>August 1, 2005.</u> Student records will be reviewed on or after October 1, 2005 by the Department to ensure that all quarterly progress reports contain all required information.
8.9 IEP Revisions and Changes 34 CFR 300		Staff Interviews, Student Records		√	A review of student records revealed that student's instructional time is driven by their behavior plan, which is not included in the approved IEP. Although staff members work on	Amego must develop an agenda for student IEP meetings that ensures that student behavior plans are discussed at each IEP meeting and incorporated into IEP's. A policy and procedure for the

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	√			√	<p>IEP goals, they are often not the primary focus. As a result, it is necessary for Amego to work with sending school districts and the IEP Team to incorporate the behavior plans into student IEPs. It also should be noted that Amego modifies the behavior plans without reconvening the IEP team or receiving consent from the parent or guardian.</p>	<p>development of IEP's and the procedures for making changes to approved IEP's must be developed. This policy must be included in the Policy and Procedure Manual to be submitted <u>August 1, 2005</u>.</p> <p>A review of student records will be conducted as part of the on-site on or after October 1, 2005. The Department will be reviewing student IEP's and documentation to ensure that the appropriate documentation is maintained by Amego.</p>
8.10 IEP- Less Restrictive Placement 28.09(9)(c)	√	Documentati on, Staff Interviews	Staff interviews and documentation review indicated that students are offered less restrictive placement options.			
9.3 Runaway students	√	Documenta- tion, Staff	Amego has a policy for runaway students that meet the Department of Education			

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18.03(10)	√	Interviews	requirements.	√		
10.1 Student: Teacher Ratios 28.06(6)(d)&(g) 28.09(7)(e)	√	Documentation, Staff Interviews Observations	The Student Teacher Ratios exceed the Department of Education requirements. Current staffing ratios for instructional groupings are 3 to 1.			
10.2 Age Range 28.06(6)(f)		Documentation, Staff Interviews		√	Documentation and interviews indicate that Amego's instructional groupings have students with age ranges that exceed 48 months.	Amego must make the necessary changes by <u>March 30, 2005</u> to ensure that no instructional grouping has an age range that exceeds 48 months.
10.4 Student: Child Care Ratios 28.09(7) 18.01(2)	√	Documentation, Staff Interviews, Observations	Amego exceeds the current student to childcare ratio.	√	The Department has not approved the program to operate at an alternative ratio.	The school must submit a Form 1 describing the rationale for these ratios for Department approval by <u>March 30, 2005</u> .
11.1 Personnel Policies 28.09(7)	√	Documentation Staff interviews	Documentation review indicates that Amego has personnel policies that meet all Department requirements.			

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28.09(11)(a) 18.05(11)	√			√		
11.3 Educational Administrator Qualifications 28.09(7)(a) 603 CMR 44.00 and 44.04	√	Personnel Record Review	(Formerly 1.1) Amego has ensured that the Educational Administrator possesses the necessary credentials.			
11.4 Teachers Special Education Teachers and Regular Education Teachers 28.09(7)(b)(c) 18.05(11)(f)		Record review		√	Not all teachers at Amego are appropriately licensed or on an approved waiver. Additionally, a review of personnel records indicates that Professional Development Plans are not maintained for teaching staff.	Amego must submit an updated staff roster <u>March 30, 2005</u> that indicates the license and/or waiver information for all teaching staff. In addition, all teaching staff must have a Professional Development Plan approved by a supervisor by <u>March 30, 2005</u> . A sample of five Professional Development Plans must be submitted to the Department for review.
11.5 Related		Documentation Staff		√	The Speech Language Pathologist is not	Amego must submit documentation that indicates

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Services Staff 28.09(7)(d)		Interviews			currently licensed by the Department of Education and is providing direct instruction to students in the classroom.	the Speech and Language Pathologists plan to obtain Department of Education Licensure by <u>March 30, 2005</u> . A waiver must be applied for in the interim.
11.6 Master Staff Roster 28.09(7)		Documentation		√	The staff roster submitted did not contain a complete list of all staff working in the approved Department of Education school. This list must include all required information on staff members who work in the residences that are approved by the Department (evening and overnights).	A complete master staff roster containing all required information and all staff members must be submitted by <u>March 30, 2005</u> .
11.7 Job Descriptions 18.05(11)(d)	√	Documentation	Amego provided the on-site team with job descriptions for all positions.	√	The job descriptions submitted did not include the UFR numbers for each position.	Updated job descriptions must be developed that include the UFR title numbers. These documents must be made available for Department

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	√			√		review during the annual update on or after October 1, 2005.
11.8 Salary Ranges 18.05(11)(e)	√	Documentation	Amego has provided the Department with the salary ranges of all staff.			
11.9 Organizational Structure 28.09(7) 28.07(c)	√	Documentation	Amego has provided the Department with evidence of an organizational structure that provides for the effective and efficient operation of the school, supervision of school staff and supervision of students.			
11.11 Supervision of Students 28.09(7) 18.03(1)	√	Documentation, Staff Interviews, Observation	The Department conducted unannounced visits to 2 of the 3 residences in the approved school and found that the staff was appropriately monitoring students. In addition, the staff members were interacting with the students.	√	A review of documentation indicates that there are insufficient policies and procedures for supervision of students during off-site activities.	Amego must submit the following documentation by March 30, 2005 : <ul style="list-style-type: none"> • A written staffing plan for all childcare workers • A description of the duties and responsibilities of the child care workers

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						<ul style="list-style-type: none"> • A detailed schedule for childcare workers and a policy describing how childcare workers are assigned to supervise students. • Sample weekly schedules indicating the types of leisure and recreational activities planned for students during afternoon, evening and weekend hours.
11.12 Accessibility of Extracurricular Activities Title VI: 42 U.S.C. 2000d; 34CFR 100.3(a), (b); Title IX: 20 U.S.C. 1681;	√	Documentation Staff Interviews	Amego provides a wide variety of extracurricular activities that are accessible to all students.			

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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; 28CFR 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	<p style="text-align: center;">√</p>			<p style="text-align: center;">√</p>		
12.2 Annual In-Service Training Plan and Calendar 28.09(7)(f)		Documenta- tion Staff interviews		<p style="text-align: center;">√</p>	A review of Amego's staff training schedule indicates that Amego did not have annual training for CPR, first aid, medication administration, Massachusetts Curriculum	Amego must submitted an updated training calendar for 2004-2005 that indicates the date, time, presenter and audience for each required Department of Education training by <u>March 30, 2005.</u>

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18.05(11)(h) Title VI: 42 U.S.C. 2000d; 34 CFR 100.3; EEOA: 20 U.S.C. 1703(f); TitleIX: 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)					Frameworks, and MCAS testing. In addition, documentation of training is not maintained in each staff's file.	In addition, an on-site review of personnel records to ensure that training documentation is maintained in staff records will be conducted on or after October 1, 2005.

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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)	√ √	Observations	Amego does not provide separate facilities for members of specific groups. All facilities are comparable throughout the school.	√		

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13.6 Library /Resource Room 18.04(6)(b)	√ √	Observations	There is an area designated as a library/resource room.	√ √	The library/resource area is a cubicle with teaching resources and student resources for instruction in classes. Not all materials in this area are appropriate for the enrolled students.	<p>Amego must submit a clear plan that details how the school will develop a library/resource area that includes materials that are appropriate to the age and abilities of enrolled students. Included in this plan should be a list of the materials the program currently has and a list of materials that the program will be purchasing. This plan must be submitted by <u>March 30, 2005</u>. The new library/resource space must be completed by <u>August 1, 2005</u>. On-site review of this space will occur on or after October 1, 2005.</p> <p>In addition, the program must submit documentation that describes other options the school has made available for students to access library/resource room materials</p>

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						(i.e. trips to the local library, library materials within each classroom).

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15.1 Parental Involvement and Parents' Advisory Group 18.05(4)(a)	√	Documentation	Amego has invited parents/guardians to participate in a Parent Advisory Group.	√	A written parental involvement plan must be developed that is included in the Policy and Procedure Manual.	A written plan for parental involvement must be developed and included in the Policy and Procedure Manual to be submitted August 1, 2005 . This plan should describe the opportunities available to parents/guardians for involvement in the school, including but not limited to the Parent Advisory Group.
15.3 Information to be Translated into Languages other than English Title VI; EEOA: 20 U.S.C. 1703(f); M.G.L. c. 76, s. 5; 603 CMR 26.02(2)		Documentation		√	Amego has not developed a clear policy to address requirements under this standard.	A clear written policy must be developed and included in the Policy and Procedure Manual to be submitted August 1, 2005 . In the interim, Amego must ensure that all notices are translated into the appropriate language for parents who are non-English speaking.
15.8	√	Documenta-	Amego has a policy for students			

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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, Part C, Sec. 722(g)(1)(J)(ii)		tion	and staff to register complaints. Additionally, Amego has a staff member designated to working directly with parents.			
16.7 Preventive Health Care 18.05(9)(f)(9) (h)		Documenta- tion		√	Amego did not provide the Department with an updated preventive health care policy that includes the requirements from the Program Review Final Report.	An updated preventive health care plan must be submitted as part of the Health Care Manual to be submitted <u>August 1, 2005</u> . This written plan must include all required components under criterion 16.7.

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<p align="center"> 18.2 Student Records 28.09(10) MGL c. 71, s. 34H 603 CMR 23.00 Family Educational Rights and Privacy Act (FERPA) </p>	<p align="center">√</p>	<p>Student records</p>	<p>A review of student records revealed that Amego has organized records that contain the majority of the required elements.</p>	<p align="center">√</p>	<p>The Department found that student records were missing incident reports from the residences and all required parental consents.</p>	<p>Amego must develop a clear plan to ensure that incident reports are being maintained in student records. In addition, a procedure for ensuring that all required consents are updated annually must be developed.</p> <p>Amego must develop consent form for all consents required by the Department of Education under criterion 15.5. These forms must be submitted for Department approval by <u>March 30, 2005</u>. Following Department approval the school can begin to update all parental consents. The Department will review student records during the annual update conducted on or after October 1, 2005 to verify that the program is implementing this requirement.</p>

