



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

August 16, 2005

Deb Smusz, Program Director
Community Care Services
70 Main St.
Taunton, MA 02780

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

Dear Ms. Smusz:

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 May 2, 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 December 30, 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 **August 31, 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 the Onsite Team Chairperson 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

Encl.: Follow-up Monitoring Report

**MASSACHUSETTS DEPARTMENT OF EDUCATION
PROGRAM REVIEW**

Community Care Services-Southeast Alternative School

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

**Onsite Visit Conducted on May 23-25, 2005
Date of this Report August 16, 2005**

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
1.3 Program's Curriculum 28.09(9)	√	Documentation review, Interviews, Observations	Community Care Services has provided a complete description of the program's curriculum and general types of staff qualifications to meet all of the students IEP needs. A review of Community Care Services documentation and interviews with the program directors indicated that there is a written plan and there are opportunities for students to participate in daily recreational and leisure	√	.	

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
	√		activities appropriate to their ages, interests, and needs.	√		
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)	√	Documentation review, Observations	Community Care Services has all current licenses, approvals, and certificates of inspection by the appropriate state and local agencies as required.			
2.3 OCCS Licensure (Not Applicable to Day Schools)	N/A					
3.1 Policies and Procedures Manual 28.09(11)(b)		Documentation review, Staff Interviews	Community Care Services has some of the required policies and procedures for the school.	√	Community Care Services does not maintain a complete policies and procedures manual on-site as required under this criterion. The school does not provide written notice to	Community Care Services must develop and submit a complete policies and procedures manual that contains all elements as required under this criterion to the Department for review by September 15, 2005.

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
	√			√	parents that copies of such policies and procedures are available upon request.	<p>Community Care Services must develop and submit to the Department a written notice to parents stating that a copy of the policies and procedures manual is available upon request by September 15, 2005.</p> <p>Once approved by the Department, the school must immediately provide written notice to all parents that copies of the policies and procedures manual are available upon request. The School must maintain a complete policy and procedure manual on-site.</p>
3.1(a) Contents		Documentation Interviews		√	Community Care Services Policies and Procedures Manual do not contain all of the required policies and procedures.	Please refer to criterion 3.1 above.
3.2 Health Care Manual 18.05(9)(d)	√	Documentation review	Community Care Services maintains a written and current health care manual that is signed by a licensed physician.			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
4.1 Aspects of program, staff, credentials, and student records 28.09(5)(a)	√	Documentation review		√	Documentation review indicated that not all teaching staff are appropriately licensed or on an approved Department of Education waiver.	Same as 11.4
4.2 Public Information and Postings 28.09(6)(a, b, c, d, e) 28.09(2)(b)(4)	√	Documentation review, Observations	Community Care Services maintains a binder on each site that contains all Public Information and Postings that is made available for public view.			
4.4 Advanced Notice of Program/ Facility Change 28.09(5)(c)	√	Documentation review, Observations	Community Care Services has provided the Department advance written notice of program/facility changes through a Form 1 prior to implementing any substantial change to the program or physical plant.			
4.5 Immediate Notification 18.03(10) 18.05(7) 28.09(12)		Documentation review, Interviews		√	Staff interviews and review of documentation indicate that Community Care Services have not provided immediate notification to the parent,	Community Care Services must submit an updated policy to the Department that includes immediate notifications to appropriate purchasers and the Department by telephone and

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u> √	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented</u> or <u>Additional Issues Identified</u> √	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
					the public school district special education administrator, and any State Agency involved in the student care or placement, including the Department through a form 1 and by telephone for all serious incidents as required.	Form 2 by <u>September 15, 2005</u> . The school must train all staff on the updated policy and procedure. An agenda and sign in sheet for all staff must be submitted to the Department by <u>October 15, 2005</u> . The Department will review Form 2's to ensure that the school is notifying the parent, the public school district special education administrator, and any State Agency involved in the student care or placement of all serious incidents.
5.2 Policies and Procedures for Coordination/ Collaboration with Public School Districts & Content requirements policies/procedures for Coordination/		Documentation review, Interviews	Community Care Services has a policy and procedure for contents and general arrangements for executing contracts with placing school districts, participation at the TEAM and other key meetings, and reviewing/revising the IEP, as well as school district monitoring of student progress. Documentation reviews of the students' files indicates the school	√	The content of the contracts that Community Care Services has developed do not contain all of the required elements.	Community Care Services must submit to the Department a revised contract that includes progress reports sent to school districts, allowing unannounced and announced visits for the sending school district and the Department, and a non-discrimination statement consistent with the requirements under 603 CMR 28.06(4)(f). An updated contract and a

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u> √	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u> √	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
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	√		coordinates and collaborates with the public school districts regarding the student’s placement.	√		specific plan on how Community Care Services will obtain current contracts that meet the requirements for all students enrolled must be submitted to the Department by <u>September 15, 2005</u>
6.1 Daily Instructional Hours 603 C.M.R. 27.00	√	Documentation review, Interviews, Observations	Community Care Services provides an average annual minimum of 5 instructional hours per school day for elementary students and 5 ½ instructional hours per school day for secondary students.			
6.2 School-to-work (Instructional hours) 603 CMR 27.02, 27.04	√	Documentation review, Interviews, Observations	Community Care Services has described how hours are spent during independent study or school-to-work activities and are counted as structured learning time.			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented</u> or <u>Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
	√			√		
6.3 Kindergarten (Instructional hours) 603 CMR 27.03(5)	N/A					
6.4 School Days per Year 28.09(9)	√	Documentation review, Interviews	As an 11-month program, Community Care Services operates 198 days every calendar school year, and has five emergency days to account for unforeseen circumstances.			
6.5 Early Release of High School Seniors 603 CMR 27.05	√	Documentation review	Community Care Services collaborates with the sending school district in cases where high school seniors are released early and follows the requirements under 603 CMR 27.05.			
7.1 Curriculum Frameworks 28.09(9)(b)	√	Documentation review, Interviews	Staff interviews and review of documentation revealed that Community Care Services personnel have a full understanding of the connection between the			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u> √	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u> √	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
	√		Massachusetts Curriculum Frameworks and the expectations of the state for student performance as well as the rights of students with disabilities to be full participants in the general curriculum. Additionally, the school has provided students with essential learning opportunities that prepare students to reach the state graduation standards.			
7.2 Staff Training 28.09(9)(b)	√	Documentation review, Interviews	Community Care Services has now provided all staff responsible for implementing services on students' Individualized Education Programs training on the learning standards of the Massachusetts Curriculum Frameworks.			
7.3 State/District Wide Assessments	√	Documentation review, Interviews	Community Care Services has a written procedure that is now being implemented consistently with all enrolled students to ensure students			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u> √	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u> √	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
28.09(9)(d)			participate in state and/or district wide assessments in accordance with the assessment participation information provided on the student’s IEP.			
8.1 Implementation Educational Services 28.04 and 28.09(8) 34 CFR 300.24	√	Documentation review, Interviews Student record review	Community Care Services now specify how all Massachusetts Curriculum Frameworks, pre-vocational, vocational, and career education services are being implemented for students. Additionally, students now have opportunities to participate in academically based electives such as computers, and arts therapy.			
8.5 Current IEP & Student Roster 28.09	√	Documentation review, Interviews	Community Care Services has a current IEP on file for each enrolled Massachusetts student that has been issued by the responsible school district and consented to by the parent, or student in applicable situations.			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
8.7 IEP Implementation 28.09	√ √	Documentation review, Interviews, Observations	Community Care Services implements all of the services as documented in student' IEP's.	√	.	
8.8 IEP-Progress Reports 28.07(3) 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)(vi ii) 34 CFR 300.347		Documentation review, Interviews, Observations	Community Care Services now consistently sends copies of progress reports to the parents and sending school district.	√	Staff interviews and review of documentation indicated that Community Care Services do not consistently address the student's progress toward the annual goals in the IEP Progress Reports, 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. Also see 8.9	Community Care Services must receive training on writing IEP-Progress Reports by <u>September 15, 2005.</u> The submission of an attendance sheet and agenda as well as the trainer's qualifications, must be submitted by <u>October 15, 2005.</u> The school must submit a random sample of the IEP Progress Reports of five students to the Department for review by <u>December 1, 2005.</u>
8.9 IEP Revisions and Changes		Documentation review, Interviews, Observations	Community Care Services has a policy for IEP revisions and changes.	√	A review of Community Care Services progress reports indicated that the	Community Care Services must revise and submit a policy to the Department for

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u> √	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u> √	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
34 CFR 300					school has not notified the public school and parents when the student's IEP needs to be revised after meeting an IEP goal or when the student is unable to meet the goal by the end of the IEP period.	IEP revisions and changes to include how the school will coordinate with the sending school district in order to revise or change an IEP when a student has met a goal or will not meet an IEP goal before the IEP expires by <u>September 15, 2005.</u> The school must provide training to all staff on the new policy by <u>October 15, 2005.</u> Documentation of the training must be submitted to the Department by <u>October 15, 2005.</u>
8.10 IEP- Less Restrictive Placement 28.09(9)(c)	√	Documentation review, Interviews	Community Care Services has a written plan that describes the mechanisms that is in place for students to return to a less restrictive educational program.			
9.3 Runaway Students 18.03(10)		Documentation review, Interviews	Although Community Care Services has developed a written policy for runaways, the Department has determined that it is not appropriate to meet the needs	√	Documentation review and interviews revealed that Community Care Services does not have a clear definition of runaways, appropriate for	Community Care Services must revise it's policy and submit the new policy to the Department for runaway students to include a clear definition of runaways,

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u> √	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u> √	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
			of the students enrolled in the program.		the school population and location, as well as procedures for handling students who runaway. The school does not consistently notify the Department, the local school district and/or other involved agencies and parents immediately whenever a student runs away as required under immediate notification of a serious incident	appropriate for the school population and location, as well as procedures for handling students who runaway by <u>September 15, 2005.</u> The school must train all staff on the approved policy by <u>October 15, 2005.</u> Documentation of the training and a random sample of the incident reports of five students specific to runaway procedures (including notification) must be submitted to the Department by <u>October 15, 2005.</u>
9.5 3-5 Day Suspensions 18.05(6)		Documentation review, Interviews		√	Community Care Services does not have a complete policy for 3-5 day suspensions as required under this criterion.	Community Care Services must develop and submit a complete policy for 3-5 day suspensions to the Department by <u>September 15, 2005.</u> All staff must receive training in the new policy by <u>October 15, 2005.</u> Documentation of the training must be submitted to the Department by <u>October 15, 2005.</u>
9.6 10+ Day		Documentation review, Interviews		√	Community Care Services does not have a complete	Community Care Services must develop and submit a

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u> √	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented</u> or <u>Additional Issues Identified</u> √	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
Suspensions Joint responsibilities of the private school and the responsible school district 34 CFR 300.519-529					policy for 10+ day suspensions as required under this criterion.	complete policy for 10+ day suspensions to the Department by <u>September 15, 2005</u> . All staff must receive training in the new policy by <u>October 15, 2005</u> . Documentation of the training must be submitted to the Department by <u>October 15, 2005</u> .
9.7 Terminations	√	Documentation review, Interviews	Community Care Services now has a written policy for terminations that is updated to reflect the current regulations.			
10.1 Student: Teacher Ratios 28.06(6)(d)&(g) 28.09(7)(e)	√	Documentation review, Interviews, Observations	Community Care Services has an alternative ratio that was approved during their Reconstruction. This exceeds the Department's ratio of 8 students to one teacher, or 12 students with a teacher and an aide.			
11.1 Personnel Policies 28.09(7)	√	Documentation review, Interviews	Community Care Services has developed a set of written personnel policies and procedures.			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
28.09(11)(a) 18.05(11)	√			√		
11.3 Educational Administrator Qualifications 28.09(7)(a) 603 CMR 44.00 and 44.04	√	Documentation review	Community Care Services has an educational administrator that meets the Department’s requirements.			
11.4 Teachers Special Education Teachers and Regular Education Teachers 28.09(7)(b)(c) 18.05(11)(f)		Documentation review, Interviews		√	Staff interviews and review of documentation revealed that Community Care Services have not ensured that all of the teaching staff has a teaching license appropriate to meet the needs of the population being served.	Community Care Services must submit an updated staff roster September 15, 2005 that indicates the license and/or waiver information for all teaching staff. In instances where there is a vacant teaching position, the school must update the Department when the position is filled and document how these vacancies are being covered during this time.
11.5 Related Services Staff		Documentation review, Interviews	Community Care Services has appropriately licensed related services staff.	√	Staff interviews and documentation review revealed that Community	Community Care Services must submit an updated Master Staff roster that includes the

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
28.09(7)(d)	√			√	Care Services has a staff member designated as performing speech and language services, who does not have a license from the Department as required.	appropriate licensure for all related staff as required by <u>September 15, 2005.</u>
11.6 Master Staff Roster 28.09(7)	√	Documentation review	Community Care Service’s Master Staff Roster has the appropriate job titles and the corresponding UFR title numbers.			
11.7 Job Descriptions 18.05(11)(d)	√	Documentation review	Community Care Services has written job descriptions for all staff positions.			
11.8 Salary Ranges 18.05(11)(e)	√	Documentation review	Community Care Services has an established salary range, and benefits for all positions.			
11.9 Organizational Structure 28.09(7) 28.07(c)	√	Documentation review, Interviews	Community Care Services has demonstrated that its organizational structure provides for the effective and efficient operation of the school, and supervision of			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
	√		the school staff and students.	√		
11.11 Supervision of Students 28.09(7)	√	Documentation review, Interviews, Observations	Community Care Services 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.			
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 104.4,104.37(a), (c); Title II: 42 U.S.C. 12132;	√	Documentation review, Interviews, Observations	Community Care Services has extracurricular activities that are accessible and non-discriminatory.			

<p>Criterion Number and Topic</p>	<p>Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u></p>	<p>Method(s) of Verification</p>	<p>Comments Regarding Corrective Action Plan Implementation</p>	<p>Corrective Action Plan Determined to be <u>Not Fully Implemented</u> or <u>Additional Issues Identified</u></p>	<p>Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance</p>	<p>Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting</p>
<p>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</p>	<p>√</p>			<p>√</p>		
<p>12.1 Staff Orientation Training 18.05911)(g)</p>		<p>Documentation review, Interviews</p>	<p>Community Care Services has developed a written plan for staff orientation.</p>	<p>√</p>	<p>Interviews revealed that all new staff do not receive all mandated trainings prior to their direct care duties with students. Documentation review indicated that not all mandated orientation trainings are documented in the personnel file.</p>	<p>Community Care Services must document all mandated trainings in the personnel file by <u>October 15, 2005.</u></p> <p>The school must submit a summary of their progress toward documenting all trainings and include the orientation records of the five most recently hired staff by <u>October 15, 2005.</u></p>
<p>12.2 Annual In-Service Training Plan and Calendar 28.09(7)(f)</p>		<p>Documentation review, Interviews</p>	<p>Community Care Services has developed and implemented a written plan for staff training that is consistent with the needs of the student population, and includes training in the</p>	<p>√</p>	<p>Documentation review indicated that not all of the required annual in-service trainings are documented in the personnel file.</p>	<p>Community Care Services must document all required annual in-service trainings in the personnel file by <u>October 15, 2005.</u></p> <p>The school must submit a</p>

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u> √	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u> √	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
18.05(11)(h)			curriculum frameworks.			summary of their progress toward documenting all trainings and include the orientation records of a random sample of five staff by <u>October 15, 2005.</u>
12.2 (d) Medication Training 18.05(9)(f)(3)(c)	√	Documentation review, Interviews	Interviews with the nurse revealed that medication training is provided by a registered nurse and now includes the nature of the medication, potential side effects and any special precautions or requirements.			
12.2(g) Interns and Volunteers Training 18.05(11)(I)	√	Documentation review, Interviews	Documentation review and interviews revealed that there is now a plan for orientation, training, and supervision of interns, volunteers and others who work at the program.			
12.2(i) Staff Evaluations 18.05911)©1		Documentation review, Interviews	Community Care Services conducts staff evaluations.	√	A review of personnel files indicated that not all staff evaluations are conducted annually as required according to the school's policy.	Community Care Services must update their personnel records to include all annual staff evaluations. The school must send a random sample of the staff evaluations of five staff (from various

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
	√			√		departments) records to the Department for by <u>January 1, 2005.</u>
13.1 Educational Facilities and Materials	√	Documentation review, Interviews, Observations	Community Care services has updated technology labs at each location. The Hyannis location recently ordered a variety of age appropriate materials for the classroom and for independent reading.			
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.	√	Documentation review, Interviews, Observations	Community Care Services do not provide separate facilities for members of a specific group.			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
art. 114; 603 CMR 28.03(1)(b)	√			√		
13.6 Library/ Resource Room 18.04(6)(b)		Observations	Community Care Services has a library/resource room at the Middleboro location.	√	Community Care Services does not have a library/resource room at the Hyannis or Berkeley location as required. Each location does not have a variety of library materials appropriate to the ages and abilities of the students enrolled.	Community Care Services must submit a plan to the Department to ensure that there is a library/resource room at the Hyannis and Berkeley locations by <u>September 15, 2005.</u> The school must submit a list of the materials at each location appropriate to the ages and abilities of the students enrolled by <u>June 1, 2006.</u>
13.8 Outdoor Space 18.0497)(b)		Observations	Community Care Services maintains an outdoor area at the Berkeley and Middleboro locations.	√	Community Care Services does not have adequate outdoor space at the Hyannis location. The school currently has gym memberships to the local health club for student use, and is currently locating a new space for the school that will include appropriate	Community Care Services must update the Department regarding their progress toward securing appropriate outdoor space for the Hyannis location on the 1 st of the following months: October, 1, 2005 February 1, 2006 June 1, 2006

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented</u> or <u>Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
	√			√	outdoor space.	
15.1 Parental Involvement and Parents' Advisory Group 18.05(4)(a)		Documentation review, Interviews	Community Care Services has developed a written plan for involving parents.	√	Community Care Services does not have an active Parents' Advisory Group at any of the locations because they recently developed a written plan.	Community Care Services must submit invitations and outreach to hold meetings, agenda's and the sign in sheets for the Parents' Advisory Group meetings to the Department until June 1, 2006 , including all attempts to hold such meetings.
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, Part C, Sec. 722(g)(1)(J)(ii)	√	Documentation review, Interviews	Community Care Services has developed and made available to parents and students a set of written procedures that may be used to register complaints regarding the students' education and care at the school.			

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
16.3 Nursing 18.05(9)(b)	√ √	Documentation review, Interviews	Community Care Services has secured the services of a registered nurse that meets the health care needs of the population.	√		

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
16.5 Administration of Medication 18.05(9)(f)	√ √	Documentation review, Interviews	Interviews revealed that Community Care Services develops and implements written policies and procedures regarding the administration of medication including the discussion of the effects of medication at reviews. Documentation revealed a significant decrease in medication errors.	√		

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
16.7 Preventive Health Care 18.05(9)(f)(9)(h)	√ √	Documentation review, Interviews	Documentation review indicated that the records at Hyannis consistently contained the required preventive health care information as required.	√		

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
18.1 Student Records 28.09(10)	√ √	Documentation review, Interviews	Community Care Services has student records that now contain all of the required documentation including complete face sheets.	√		

Criterion Number and Topic	Implementation Status of Requirements or Corrective Action Plan Determined to be <u>Substantially Implemented</u>	Method(s) of Verification	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not Fully Implemented or Additional Issues Identified</u>	Findings Regarding Incomplete Implementation of Approved Corrective Action Plan or Identification of Additional Issues of Noncompliance	Further Corrective Action Ordered by the Department of Education and Timelines for Implementation and Further Progress Reporting
18.2 Student Records 28.09(10) MGL c. 71, s. 34H 603 CMR 23.00 Family Educational Rights and Privacy Act (FERPA)	√ √	Documentation review, Interviews	Community Care Services has student records with face sheets that are updated and complete.	√		