



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 18, 2006

Dr. Timothy Callahan
Brandon School
27 Winter Street
Natick, MA 01760

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

Dear Dr. Callahan:

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 September 10, 2003. This report also includes a report on the status of implementation for new state or federal special education requirements enacted since your school's last Program Review.

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

The Department will notify you of your school's next regularly scheduled Program Review several months before it is to occur. At this time we anticipate the Department's next routine

monitoring visit to occur sometime during the FY 2009, unless the Department determines that there is some reason to schedule this visit earlier.

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 781-338-3739.

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
Joseph Tondorf, Director of Programs
Trish Kelly, Director of Administration

Encl.: Follow-up Monitoring Report

**MASSACHUSETTS DEPARTMENT OF EDUCATION
PRIVATE SCHOOL MID-CYCLE PROGRAM REVIEW**

Brandon School

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

Action Plan Submitted on October 24, 2003

Onsite Visit Conducted on November 28-29, 2005

Date of this Report January 18, 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 |
|--|---|----------------------------------|--|---|--|---|
| 1.3 Program's Curriculum 28.09(9) | √ | Documentation Review | Brandon School provided a description of the program's curriculum and general types of staff qualifications to meet the needs of the students. | | | |
| 2.2 Approvals, Licenses, Certificates of Inspection 28.09 (2)(b)4-5 28.09(5) 28.09(6) | √ | Documentation Review | Brandon School has all required licenses, approvals and certificates of inspection. | | | |

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| 18.04(1) 102 CMR 3.06 (4)(b) | | | | | | |
| 2.3 DEEC Licensure (Not Applicable to Day Schools) | √ | Documentation Review | Brandon School has a current, full license from the Department of Early Education and Care. | | | |
| 3.2 Health Care Manual 18.05 (9)(d) | √ | Documentation Review | Brandon School has included both of the new health care policies in its Health Care Manual and has maintained all other required policies. | | | |
| 4.4 Advanced Notice of Program/ Facility Change 28.09(5)(c) | √ | Documentation Review and submission of relevant Form 1's. | Brandon School has submitted all required Form 1 notifications to the Department. | | | |
| 4.5 Immediate Notification 18.03(10) 18.05(7) 28.09(12) | √ | Documentation Review and submission of relevant Form 2's. | Brandon School has submitted all required Form 2 notifications to the Department and has sent required notification to | | | |

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| | | | parents and sending school districts. | | | |
| 5.2 Policies and Procedures for Coordination/ Collaboration with Public School Districts & Content requirements policies/proce- dures 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 | √ | Documentation Review | Brandon School has policies/procedures that describe the roles and responsibilities of all staff regarding the coordination and collaboration with public school districts including policies on transition plans for the age of majority, school district monitoring of student progress, and administration of tests. | | | |

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| 6.1 Daily Instructional Hours 603 C.M.R. 27.00 | √ | Documentation Review and Observation | Brandon School provides the required instructional hours for all of its students. | | | |
| 6.2 School-to-Work (Instructional hours) 603 CMR 27.02, 27.04 | √ | | Not Applicable. Brandon School does not have a School-to-Work program. | | | |
| 6.3 Kindergarten (Instructional hours) 603 CMR 27.03(5) | √ | | Not Applicable. Brandon School does not service kindergarten age students. | | | |
| 6.4 School Days per Year 28.09(9) | √ | Documentation Review | Brandon School is an approved 12-month program and operates for the required number of days. | | | |
| 6.5 Early Release of High School Seniors | √ | | Not Applicable. Brandon does not have an early release for high school seniors. | | | |

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| 603 CMR 27.05 | | | | | | |
| 7.1 Curriculum Frameworks 28.09(9)(b) | √ | Documentation Review and Observations | Brandon School personnel reflect a full understanding of the connection between the Massachusetts Curriculum Frameworks and the expectations of the state for student performance. | | | |
| 7.3 State/District Wide Assessments 28.09(9)(d) | √ | Document Review | Brandon School has written procedures outlining how the school ensures that all students participate in the state and/or district wide assessments. | | | |
| 8.4 Current IEP & Student Roster 28.09 | √ | Student Record Review | Brandon School either has a current signed IEP for its enrolled students or has documented efforts to obtain the required signatures. | | | |
| 8.6 IEP Implementation 28.09 | √ | Student Record Review | Brandon School has implemented all services on student IEPs. | | | |

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| 8.7 IEP- Progress Reports 28.07(3) 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)v iii) 34 CFR 300.347 | √ | Student Record Review | | X | Student Records revealed that student progress reports are inconsistent in quality and many progress reports need to provide more detail and insight into the annual student progress. | By March 15 please submit copies of five quarterly progress reports to be determined by the Department and communicated to Brandon by March 10, 2006. |
| 8.8 IEP- Revisions and Changes 34 CFR 300 | √ | Student Record Review | Brandon School has notified the relevant parties when an IEP needs to be revised. | | | |
| 9.3 Runaway Students 18.03(10) | √ | Documentation Review | Brandon School has a written runaway policy and immediately notifies the appropriate agencies and parents if a student runs away. | | | |

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| 9.7 Terminations 18.05(7) 28.09(12)(b) | √ | Documentation Review and Interviews | Brandon School's termination policy includes all mandatory requirements. Brandon School has properly notified the Department when it has had to terminate a student on an emergency basis. | | | |
| 10.1 Student: Teacher Ratios 28.06(6)(d)& (g) 28.09(7)(e) | √ | Documentation Review and Observations | Brandon School maintains all required student/teacher ratios. | | | |
| 10.4 Student: Child Care Ratios 28.09(7) 18.01(2) | √ | Documentation Review and Observations | Brandon School maintains all required student/childcare ratios. | | | |
| 11.1 Personnel Policies 28.09(7) | √ | Documentation Review | Brandon School has all required personnel policies and procedures. | | | |

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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 | √ | Documentation Review | Brandon’s Educational Administrator is qualified and has the required credentials. | | | |
| 11.4 Teachers Special Education Teachers and Regular Education Teachers 28.09(7)(b)(c) 18.05(11)(f) | √ | Documentation Review | Brandon School teachers are all appropriately licensed or waived to meet the needs of the student population. | | | |
| 11.4(a) Professional Development Plans 28.09(7)(b)(c) | √ | Documentation Review | Professional Development Plans are developed for Brandon School teachers who are required to have them. | | | |

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| 18.05(11)(f) | | | | | | |
| 11.5 Related Services Staff 28.09(7)(d) | √ | Documentation Review | All related services staff are appropriately certified, licensed or registered by their respective state boards or professional associations. | | | |
| 11.6 Master Staff Roster 28.09(7) | √ | Documentation Review | Brandon School maintains a master list of all staff with corresponding UFR title numbers and FTE's. | | | |
| 11.7 Job Descriptions 18.05(11)(d) | √ | Documentation Review | Brandon School has written descriptions for all staff positions. | | | |
| 11.8 Salary Ranges 18.05(11)(e) | √ | Documentation Review | Brandon School provided written salary ranges for all of its staff. | | | |
| 11.9 Organizational Structure 28.09(7) 28.07(c) | √ | Documentation Review and Observation | Brandon School has demonstrated that its organizational structure provides for the effective and efficient operation of the school. | | | |

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| 11.11 Supervision of Students 28.09(7) | √ | Documentation Review and Observation | Brandon School has developed and implemented a plan for the effective supervision of its students. | | | |
| 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; 28 CFR 35.130; NCLB: Title X, Part C, Sec. 721; | √ | Interviews and Observation | Brandon School provides all of its extracurricular activities in a nondiscriminatory manner. | | | |

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| Mass. Const. 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) | √ | Documentation Review | Brandon School has developed and implemented a written plan for staff orientation and annual in-service training for all staff consistent with the needs of the student population. | | | |
| 12.2(e) Student Record Training 28.09(10) | √ | Documentation Review | Brandon School has trained staff to keep current and complete files for each student. | | | |

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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 | Not Applicable. Brandon School does not offer separate facilities for any segment of its student body. | √ | | |
| 15.1 Parental Involvement and Parents' | √ | Documentation Review | Brandon School has developed and maintained a Parent Advisory Group and | | | |

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| Advisory Group 18.05(4)(a) | √ | | has a designated staff person to support it. | √ | | |
| 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 Review and Interviews | Brandon School ensures that general announcements and notices of extracurricular activities are given to parents in the primary language of the home. | | | |
| 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 | | Documentation Review | | X | Brandon School has written grievance procedures for both staff and students, however it needs to include an avenue for students to bring a discrimination claim based on sex or disability. Also, the grievance procedure for parents should include a hierarchy of steps if | |

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| U.S.C. 12132; 28 CFR 35.107; NCLB: Title X, Part C, Sec. 722(g)(1)(J)(ii) | √ | | | √ | parents don't agree with the findings of the person charged with investigating the complaint. | |
| 16.9 Students with Comfort Care/Do Not Resuscitate Orders | √ | Documentation Review | Brandon School has developed a policy on the care of a child with a DNR order. | | | |
| 16.10 Meningococcal Disease and Vaccination MGL, Chapter 76, s.15D 105 CMR 220.700 | √ | Documentation Review | Brandon School has a written policy included in its Health Care Manual that describes how it will meet regulations pertaining to Meningococcal Disease and Vaccination. | | | |
| 18.1 Student Records 28.09(10) | √ | Student Record Review | Student Records are current and complete. | | | |
| 18.2 | √ | | | | | |

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| Student Records 28.09(10) MGL c. 71, s. 34H 603 CMR 23.00 Family Educational Rights and Privacy Act (FERPA) | | Student Record Review | Student Records contain all required information and are kept current. | | | |