



The Commonwealth of Massachusetts Department of Education

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February 14, 2006

Rosemary Littlefield, Executive Director
Boston Higashi School
800 North Main Street
Randolph, MA 02368

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

Dear Ms. Littlefield:

Enclosed is the Department's Program Review Follow-up Monitoring Report together with findings regarding your private school's Mid-Cycle 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 October 23, 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 all 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 09, 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 781-338-3746.

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
PRIVATE SCHOOL MID-CYCLE PROGRAM REVIEW**

Boston Higashi School- Day and Residential Programs

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

**Action Plan Submitted on January 8, 2004
Onsite Visit Conducted on December 2-3, 2005
Date of this Report February 14, 2006**

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1.3 Program's Curriculum 28.09(9)	√	Documentation review, interviews	The Boston Higashi School has a Director of Training and Curriculum that oversees the planning of daily lesson plans and units. The curriculum is comprehensive and covers all age groups and levels of instruction. The school has a system for updating the curriculum to meet the individual needs of students.	√		
2.2 Approvals, Licenses,	√	Documentation review	The Boston Higashi School has current approvals, licenses, and certificates of inspection.			

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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 revealed that the school contracted a licensed environmental waste company to remove the asbestos floor tiles in the DeSales building. All work was completed in August of 2003.	√		
2.3 DEEC Licensure (Not Applicable to Day Schools)	√	Documentation review	The Boston Higashi School has an updated Department of Early Education and Care license for the residential program.			
3.2 Health Care Manual 18.05 (9)(d)	√	Documentation review	The Boston Higashi School has a complete Health Care Manual that is approved by a licensed Physician.			
4.4 Advanced Notice of Program/ Facility Change 28.09(5)(c)	√	Documentation review	The Boston Higashi School has a policy and procedure for advanced notice of program/facility change. The school has sought prior approval from the Department for any changes to their program including when it is anticipated			

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	√		that a change in the approved private school will result in a request for tuition adjustment.	√		
4.5 Immediate Notification 18.03(10) 18.05(7) 28.09(12)	√	Documentation review, interviews, student record review	The Boston Higashi School has a policy for immediate notification of incidents. The school notifies the Department of Education, any State Agency involved in the placement of the child, the Public Special Education Administrator, and the parent of incidents that require immediate notification.			
5.1 Student Admissions 28.09(11) 18.05(1) and (2)	√	Documentation review, interviews	The Boston Higashi School has revised their Student Admissions policy and practice to make available all of the policies and procedures to parents and school district prior to admission.			
5.2 Policies and Procedures for Coordination/ Collaboration with Public School Districts	√	Documentation review, interviews, student record review	Interviews and documentation review revealed that all contracts are signed prior to students beginning at Boston Higashi School. The school has a policy for granting of high school diplomas consistent with			

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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	√		Department requirements, and the school's requirements for issuing a certificate of completion.	√		
6.1 Daily Instructional Hours 603 C.M.R. 27.00	√	Documentation review	The Boston Higashi School provides the required daily instructional hours of an average of 5 hours per day for elementary age students and 5 ½ hours per day for high school age students.			
6.2 School-to-work	√	Documentation review,	The Boston Higashi School has a school-to-work program called			

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(Instructional hours) 603 CMR 27.02, 27.04	√	interviews, observations	the Emergence program. The school has written guidelines for verifying hours spent at work sites.	√		
6.3 Kindergarten (Instructional hours) 603 CMR 27.03(5)	Not Applicable		The Boston Higashi School does not have a separate Kindergarten program.			
6.4 School Days per Year 28.09(9)	√	Documentation review, interviews	The Boston Higashi School has at least 216 school days per year and an additional 5 days for unforeseen circumstances included on their school calendar.			
6.5 Early Release of High School Seniors 603 CMR 27.05	Not Applicable		The Boston Higashi School does not provide the early release of High School seniors.			
7.1 Curriculum Frameworks 28.09(9)(b)	√	Documentation review, interviews, observations	The Boston Higashi School provides essential learning opportunities for all students to reach the state graduation standards. All staff have an awareness and understanding of			

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	√		the Massachusetts Curriculum Frameworks.	√		
7.2 Staff Training 28.09 (9)(b)	√	Documentation review, interviews	Based upon staff interviews during the Mid-Cycle Review all direct care staff have an understanding and knowledge of the general curriculum expectations and learning standards of the Massachusetts Curriculum Frameworks.			
7.3 State/District Wide Assessments 28.09(9)(d)	√	Documentation review, student record review	The Boston Higashi School has a written procedure for students participating in the Massachusetts Comprehensive Assessment System (MCAS) and State/District-Wide Assessments.			
8.1 Implementation -Educational Services 28.04 and 28.09(8) 34 CFR 300.26	√	Documentation review, interviews, observations, student record review	Interviews revealed that almost all students in the vocational program have paid positions on-site or in the community. All students eligible for vocational/and or career education as determined by the IEP Team are offered the opportunity for employment.			

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<p>8.2 Implementation -Related Services 28.04 and 28.09(8) 34 CFR 300.24</p>	√	Documentation review, interviews, student record review	The Boston Higashi School provides all students with the necessary related services as stated on their IEP including Speech and Language Therapy, Occupational Therapy, and Physical Therapy.	√		
<p>8.5 Current IEP & Student Roster 28.09</p>		Documentation review, interviews, observations		√	Some students at the Boston Higashi School do not have a current or updated IEP as evidenced on the IEP & Student Roster and in the student files.	<p>The school must develop a policy and procedures for obtaining signed IEP 's from the sending school district and submit the new policy to the Department by <u>March 1, 2006.</u></p> <p>The school must submit an updated IEP and student roster to the Department, which documents the reasons why an IEP is not current or unsigned by <u>March 1, 2006.</u> Efforts made to obtain such documents should also be included.</p>
<p>8.8 IEP Progress</p>		Documentation review,	The Boston Higashi School creates detailed progress reports	√	Not all progress reports include the extent to	The Boston Higashi School must retrain all educational and

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Reports 28.07(3) 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)(viii) IDEA Regulations: 300.347	√	interviews, student record review	quarterly.	√	which progress is sufficient to enable the child to achieve the goal by the end of the IEP period. The school has submitted acceptable training materials to retrain all staff on the completion of progress reports.	residential staff on the completion of IEP progress reports by <u>March 1, 2006.</u> The school must submit a training agenda sign in sheet to the Department by <u>April 1, 2006.</u>
8.9 IEP- Less Restrictive Placement 28.09(9)(c)	√	Documentation review, interviews	The Boston Higashi School has a policy for ensuring that students are educated in the least restrictive placement and ensuring that the school provides information to the IEP team to ensure the placement is appropriate to meet the current needs of the student in the least restrictive placement.			
9.4 Restraints 18.05 (5) 603 CMR 46.00	√	Documentation review, interviews	The Boston Higashi School utilizes the Non-Abusive and Psychological and Physical Intervention (NAPPI) curriculum, which complies with the Office of Child Care Services (now Department of			

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	√		Early Education and Care) regulations.	√		
10.1 Student: Teacher Ratios 28.06(6)(d)&(g) 28.09(7)(e)	√	Documentation review, interviews, observations	<p>Boston Higashi School is now able to have more students participate in community employment opportunities because of the increased staffing levels requested for and approved through their recent Extraordinary Relief Application.</p> <p>Classroom observations revealed that staffing levels are adequate to ensure that students who may be having a difficult time are being managed while the rest of the class is supervised. The approved ratios for the classrooms are 4:1, and each classroom has an assigned floating teacher.</p>			
10.4 Student: Child Care Ratios 28.09(7) 18.01(2)	√	Documentation review, interviews, observations	The Boston Higashi School has been able to increase the staffing levels to meet the behavioral needs of the students as a result of their recent			

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			<p>Extraordinary Relief Application.</p> <p>The current staffing levels are adequate to meet the needs of the students enrolled in the program. The current ratios during awake hours are 4:1, while the overnight ratios are 6:1 with supervisors available to float between the school and residences.</p>			
11.1 Personnel Policies 28.09(7) 28.09(11)(a) 18.05(11)	√	Documentation review	The Boston Higashi School has a set of written personnel policies and procedures that meet the Department's requirements.			
11.3 Educational Administrator Qualifications 28.09(7)(a) 603 CMR 44.00 and 44.04	√	Documentation review	The Boston Higashi School's Educational Administrator meets the Department's requirements to serve in this capacity.			
11.4 Teachers		Documentation review,		√	The Boston Higashi School has teaching staff	The school must submit a plan to have all teaching staff

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Special Education Teachers and Regular Education Teachers 28.09(7)(b)(c) 18.05(11)(f)	√	interviews		√	that do not have a current license and/or waiver.	licensed or on an approved waiver to the Department by <u>March 1, 2006.</u> The school must submit a bi-monthly update on the licensure or waiver status of its teaching staff beginning <u>March 1, 2006.</u>
11.4(a) Professional Development Plans 28.09(7)(b)(c) 18.05(11)(f)	√	Documentation review, interviews, observations	The Boston Higashi School requires all teachers to have a Professional Development Plan that is approved by his/her supervisor.			
11.5 Related Services Staff 28.09(7)(d)	√	Documentation review, interviews	All related staff at the Boston Higashi School are appropriately certified, licensed or registered by their respective state boards or professional associations.			
11.6 Master Staff Roster 28.09(7)	√	Documentation review, interviews, observations	The Boston Higashi School has submitted a current master staff roster that includes job titles together with corresponding			

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	√		UFR title numbers and full-time equivalents.	√		
11.7 Job Descriptions 18.05(11)(d)	√	Documentation review, interviews, observations	The Boston Higashi School has current job descriptions for all staff positions.			
11.8 Salary Ranges 18.05(11)(e)	√	Documentation review, interviews, observations	The Boston Higashi School has salary ranges for all staff.			
11.9 Organizational Structure 28.09(7) 28.07(c)	√	Documentation review, interviews, observations	The Boston Higashi School has an organizational structure that provides for the effective and efficient operation of the school and supervision of the students.			
11.10 Supervision of Child Care Workers (Direct Care Staff) 18.03(4)	√	Documentation review, interviews, observations	The Boston Higashi School has added additional supervisor positions as a result of their recent Extraordinary Relief Application. There is now adequate supervision to ensure that child-care workers are being appropriately monitored and supervised. Each residential division has a			

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			Master Teacher and/or an Assistant Division Director or Division Director to provide on-the-job training and supervision.			
11.11 Supervision of Students 28.09(7)	√	Documentation review, interviews, observations	The Boston Higashi School has an adequate plan to ensure appropriate supervision of students during on and off campus activities.			
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	√	Documentation review, interviews	The Boston Higashi School has accessible extracurricular activities including: Jazz band, Special Olympics, and a Community Run.			

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U.S.C. 12132; 28 CFR 35.130; NCLB: Title X, Part C, Sec. 721; Mass. Const. amend. art 114; M.G.L. c. 76, s. 5; 603 CMR 26.06						
12.1 Staff Orientation Training 18.05(11)(g)	√	Documentation review	The Boston Higashi School now provides all new staff with all mandated training through their orientation program, specifically, transportation safety, civil rights responsibilities and restraint procedures prior to their direct care duties with students.			
12.2 Annual In-Service Training Plan and Calendar 28.09(7)(f) 18.05(11)(h)		Documentation review, interviews	The Boston Higashi School has provided the Department with an annual in-service training plan and calendar.	√	Documentation review and interviews revealed that not all staff has received training in all mandated topics.	The school must develop a policy to ensure that staff that have missed trainings make up trainings within a specified amount of time. The new policy must be submitted to the Department by March 1, 2006 . The school must review all files and generate a list of all

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						staff that have not received all of the mandated trainings. The school must utilize the list to provide all missed trainings to staff by April 1, 2006 and submit documentation of such to the Department.
12.2(a) Behavior Management and Restraint Training <i>28.09(11)</i> <i>18.05(5)</i>	√	Documentation review, interviews, observations	<p>The Boston Higashi School implements the Non-Abusive Psychological and Physical Intervention (NAPPI) curriculum for behavior management and restraint training, which is in compliance with the Department of Early Education and Care (formerly the Office for Child Care Services) regulations.</p> <p>Daily Life Therapy is also the foundation of the philosophy of the school. Daily Life Therapy emphasizes group dynamics incorporates physical education, art, music, academics, the acquisition and development of communication and daily living skills to promote social</p>			

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	√		independence.	√		
12.2 (b) Child Abuse Reporting 18.05(9)(j)	√	Documentation review	The Boston Higashi School's policy for child abuse reporting includes parental notification, and procedures for direct care workers to file directly since they are mandated reporters.			
12.2(d) Details Medication Training 18.05(9)(f)(3) (c)	√	Documentation review, interviews	The Boston Higashi nursing staff dispenses all medications to students. The nursing staff provides medication training including training on the nature of the medication and potential side effects to staff.			
12.2 (i) Staff Evaluations 18.05(11)(c)1.		Documentation review, interviews		√	Not all staff evaluations have been completed annually.	The school must review all files and generate a list of all staff that have not received an annual evaluation. The school must utilize the list to provide all overdue evaluations to staff by <u>April 1, 2006.</u> Additionally, the employee and the supervisor must sign all evaluations. Submit a list of all Boston Higashi employees that

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						includes the date of their most recent staff evaluation to the Department by May 1, 2006 .
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, interviews, observations	The Boston Higashi School has comparable educational facilities for all students.			

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<p>13.4 Physical Facility/Architectural Barriers 18.04(8)</p> <p>Section 504: 29 U.S.C. 794; 34 CFR 104.21,104.22; Title II: 42 U.S.C. 12132; 28 CFR 35.149, 35.150; Mass. Const. amend. art. 114</p>	<p>√ √</p>	<p>Documentation review, interviews</p>	<p>The Boston Higashi School has a specific plan that addresses how the Boston Higashi School would offer programmatic accessibility for a student who may become physically impaired in the Brady Building.</p>	<p>√</p>		

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13.6 Library/ Resource Room 18.04(6)(b)	√ √	Documentation review, interviews, observations	The Boston Higashi School has a library for student use that includes a variety of materials that are appropriate to the age and abilities of the students enrolled. The school has a new literacy program in which teachers are developing books for students use.	√		
15.1 Parental Involvement and Parents'		Documentation review, interviews, observations		√	Based on the program review the school has a Parent Association that charges dues. It is not	The Boston Higashi School must coordinate with the Parents Association to create a policy to ensure that parents

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Advisory Group 18.05(4)(a)					clear if parents are required to pay dues as part of their membership. Charging dues for parents may prevent some parents from being involved and cannot be a requirement of participation.	are not required to pay dues as parent of their membership. All parents must have access to all parental involvement groups. This policy must be submitted to the Department on <u>March 1, 2006.</u>
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	The Boston Higashi School has a policy for information to be translated into languages other than English.			
15.5 Parent Consent 28.07(1)(b)		Documentation review, interviews, student record review	The Boston Higashi School has parent consents for Behavior Management.	√	The Boston Higashi School does not have consents for IEP related matters and human sexuality.	The Boston Higashi School must develop consent forms for IEP related matters and human sexuality to be included in all students files by <u>April, 2006.</u>
15.8 Registering	√	Documentation review	The Boston Higashi School has a policy and procedure for			

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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)	√		parents, students, and staff to register complaints.	√		
16.9 Students with Comfort Care/Do Not Resuscitate Orders	√	Documentation review	The Boston Higashi School has a policy for students with Comfort Care/Do Not Resuscitate Orders.			
16.10 Meningococcal Disease and Vaccination	√	Documentation review	The Boston Higashi School has a policy and procedure for Meningococcal Disease and Vaccination.			

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
MGL, Chapter 76, s.15D 105 CMR 220.700						
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, student record review	The student records and face sheets now consistently contain: The name of the educational case manager, the location of the residential service within the facility, and name of residential case manager or supervisor, date of next expected 3 year reevaluation, starting and expiration dates of current IEP, date of last complete physical health examination by a physician, medications, and information specific to this student regarding handling of medical emergencies as required.			