



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

February 2, 2007

Dr. Charles Conroy
Dr. Franklin Perkins School
971 Main Street
Lancaster, MA 01523

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

Dear Dr. Conroy:

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 August 18, 2004. 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 2010, unless the Department determines that there is some reason to schedule this visit earlier.

As the Department previously informed you, in cases where a private school fails to fully and effectively implement a Corrective Action Plan which was proposed by your school and approved by the Department, the Department must then prepare a Corrective Action Plan for the school which must be implemented without further delay. You will find these requirements for corrective action and further progress reporting included in the attached report together with any steps that must be taken by the school to fully implement new special education requirements. Please provide the Department with your written assurance that the Department's requirements for corrective action will be implemented by your private school within the timelines specified. Your statement of assurance must be submitted to the Department's Onsite Chairperson by February 19, 2007.

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 781-338-3717.

Sincerely,

Betsy Holcombe, Program Review Follow-up Chairperson
Program Quality Assurance Services

Darlene Lynch, Director
Program Quality Assurance Services

c: David P. Driscoll, Commissioner of Education
T. Nathanael Shepherd, Chairperson, Board of Directors
Laura Beckman-Devik, Local Program Review Coordinator

Encl.: Follow-up Monitoring Report
Full Private School Approval Certificate, Expiration Date: August 31, 2010

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

Dr. Franklin Perkins School

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

**Action Plan Submitted on October 25, 2004
Progress Reports Submitted on November 11, 2005
Onsite Visit Conducted on December 7, 2006
Date of this Report February 2, 2007**

Criterion Number and Topic	Implementa- tion Status of Requirements or Corrective Action Plan Determined to be <u>Substan- tially</u> <u>Implemented</u>	Method(s) of Verifica-tion	Comments Regarding Corrective Action Plan Implementation	Corrective Action Plan Determined to be <u>Not</u> <u>Fully</u> <u>Implemen- ted or</u> <u>Additional</u> <u>Issues</u> <u>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
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)	√	Documentatio n	All approvals, licenses, and certificates of inspection are current.	√		
2.3			The DEEC licensures are			

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DEEC Licensure (Not Applicable to Day Schools)	√	Documentation	current for the residential program. It is not required for the day program.	√		
3.1 Policies and Procedures Manual 28.09(11)(b) 18.05(9)(d)	√	Documentation	The policies contain all required elements and are included in the Policies and Procedures Manual.			
3.2 Health Care Manual 18.05 (9)(d)	√	Documentation	The policies contain all required elements and are included in the Health Care Manual			
4.2 Public Information and Postings 28.09(6)(a, b, c, d, e) 28.09(2)(b)(4)	√	Observation	First aid, medical, and emergency telephone numbers are posted in each building, and evacuation routes are posted in every classroom and bedroom, as required.			
4.4 Advanced Notice of Program/ Facility Change 28.09(5)(c)	√	Documentation	The policy contains all required elements and is included in the Policies and Procedures Manual. The Form 1 is submitted, as needed.			
4.5 Immediate	√	Documentation	The policy contains all required elements and is			

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Notification 18.03(10) 18.05(7) 28.09(12)		n	included in the Policies and Procedures Manual. The Form 2 is submitted, as needed.			
5.1 Student Admissions 28.09(11)	√	Documentation Interview	The student admissions policy contains all required elements, such as parent access to policies and procedures upon request.			
5.2 Policies and 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	√	Documentation	The policies contain all required elements and are included in the Policies and Procedures Manual.			
5.2(a) (Formerly 5.3) Content requirements policies/ procedures for	√	Documentation	The policies contain all required elements and are included in the Policies and Procedures Manual.			

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Coordination/ Collaboration with Public School Districts 28.06(2-3) 28.07(5) 28.09(9)©&(d) 28.09(2)(b)(7) 34 CFR 300.349 and 300.400-.401	√			√		
6.1 Daily Instructional Hours 603 C.M.R. 27.00	√	Documentation	The Schools meet the daily instructional hours requirements.			
6.2 School-to-work (Instructional hours) 603 CMR 27.02, 27.04		Documentation		√	Guidelines for school-to-work opportunities were not submitted.	Guidelines for school-to-work opportunities must be submitted, by March 1, 2007.
6.3 Kindergarten (Instructional hours) 603 CMR 27.03(5)	√	Documentation	The Schools meet the Kindergarten instructional hours requirements.			

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6.4 (Formerly 6.2) School Days per Year 28.09(9)	√	Documentation	The Schools meet the school days per year requirement.	√		
6.5 Early Release of High School Seniors 603 CMR 27.05		Documentation		√	A policy for the early release of high school seniors was not submitted.	A policy containing all required elements must be submitted, by March 1, 2007.
7.1 Curriculum Frameworks 28.09(9)(b)	√	Documentation	The curriculum which is utilized provides many student learning opportunities.			
7.2 Staff Training 28.09(9)(b)	√	Documentation	All staff are receiving mandated training on curriculum frameworks, as required.			
7.3 State/District Wide Assessments 28.09(9)(d)	√	Documentation	Students are taking state and district wide assessments as required.			
8.1 Implementation Educational Services 28.04 28.09(8)	√	Documentation	A curriculum for job readiness is now being offered in grades 7-12.			

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34 CFR 300.24	√			√		
8.4 Program Modifications and Support Services for Limited English Proficient Students		Documentation		√	A written description of program modifications and support services for limited English proficient students was not submitted.	A written description of program modifications and support services for limited English proficient students must be submitted, by March 1, 2007.
8.5 (Formerly 8.4) Current IEP and Student Roster 28.09	√	Documentation	The current IEP and student roster is complete and contains all required elements.			
8.8 (Formerly 8.7) IEP Progress Reports 28.07(3) 20 U.S.C. Chapter 33, Section 1414(d)(1)(A) (viii) 34 CFR 300.347	√	Documentation Student Records	Progress reports contain all required elements and are consistently included in student records.			
8.9 IEP- Revisions	√	Documentation	The policy contains all required elements and is			

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& Changes 34 CFR 300	√	n	included in the Policies and Procedures Manual.	√		
9.1 Policies and Procedures 18.05(5)	√	Documentation	There is a comprehensive set of written discipline and behavior management policies and procedures, such as the notification procedures, which contain all required elements and are included in the Policies and Procedures Manual.			
9.3 Runaway Students 18.03(10)	√	Documentation	The policy contains all required elements, such as the notification procedures and is included in the Policies and Procedures Manual.			
9.4 Restraints 18.05(5)(h) 603 CMR 46.00 102 CMR 3.00	√	Documentation	The physical restraint policies contain all required elements, such as notification procedures for serious injury to a staff or student, and are included in the Policies and Procedures Manual.			
9.5 3-5 Day Suspensions 18.05(6)	√	Documentation	The suspension policies contain all required elements and are included in the Policies and Procedures Manual.			

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9.6 10+ Day Suspensions Joint responsibilities of the private school and the responsible school district 34 CFR 300.519-529	√	Documentation	The suspension policies contain all required elements, such as the manifestation determination process, and are included in the Policies and Procedures Manual.	√		
9.7 Terminations 18.05(7) 28.09(12)(b)	√	Documentation	The termination procedures contain all required elements and are included in the Policies and Procedures Manual.			
10.1 Student:Teacher Ratios 28.06(6)(d)&(g) 28.09(7)(e)	√	Documentation	The student: teacher ratios of 8:1 are appropriate and meet all required elements.			
10.4 Student: Child Care Ratios 28.09(7) 18.01(2)	√	Documentation Observation	The student: child care ratios are appropriate and meet all required elements.			
11.1 Personnel Policies	√	Documentation	The personnel policies contain all required elements.			

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28.09(7) 28.09(11)(a) 18.05(11)						
11.3 Educational Administrator Qualifications 28.09(7)(a) 603 CMR 44.00 and 44.04	√	Documentation	The Educational Administrator meets the required qualifications.			
11.4 Teachers Special Education Teachers and Regular Education Teachers 28.09(7)(b)(c) 18.05(11)(f)	√	Documentation	The teacher roster is complete and all are currently licensed or waived.			
11.4(a) Professional Development Plans 28.09(7)(b)(c) 18.05(11)(f)	√	Documentation Personnel Files	The professionally licensed teachers have updated professional development plans.			
11.5 Related Services Staff		Documentation	The related services roster has been submitted.			

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28.09(7)(d)	√			√		
11.6 Master Staff Roster 28.09(7)	√	Documentation	The Educational Program master staff roster is complete and contains all required elements.			
11.7 Job Descriptions 18.05(11)(d)	√	Documentation	The job descriptions are current and contain all required elements.			
11.8 Salary Ranges 18.05(11)(e)	√	Documentation	The teaching staff salary ranges are current and contain all required elements.			
11.9 Organizational Structure 28.09(7) 28.07(c)	√	Documentation	The Organizational Chart is complete and ensures appropriate supervision to staff and students, and the effective and efficient operation of the School.			
11.11 Supervision of Students 28.09(7)	√	Documentation Observation	Students are appropriately supervised.			
11.12 Accessibility of Extracurricular Activities Title VI: 42 U.S.C. 2000d; 34 CFR	√	Documentation	All extracurricular activities are available to all students.			

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100.3(a), (b); Title IX: 20 U.S.C. 1681; 34 CFR 106.31, 106.41; Section 504: 29 U.S.C. 794; 34 CFR 104.4,104.37(a), (c); Title II: 42 U.S.C. 12132; 28 CFR 35.130; NCLB: Title X, Part C, Sec. 721; Mass. Const. amend. art 114; M.G.L. c. 76, s. 5; 603 CMR 26.06	√			√		
12.1 Staff Orientation Training 18.05(11)(g)	√	Documentation Personnel Files	All new staff are receiving all mandated trainings as required.			
12.2 Annual In-Service Training Plan and Calendar 28.09(7)(f)		Documentation Personnel Files	.	√	All staff providing direct care to students are not receiving all mandated trainings annually.	On-site verification of personnel training records will ensure that all staff providing direct care to students are receiving all mandated trainings annually, by March

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18.05(11)(h)	√			√		1, 2007.
12.2(d) Details Medication Training 18.05(9)(f)(3)(c)		Documentation Personnel Files		√	All staff providing direct care to students are not receiving annual mandated trainings in medication side-effects and precautions. See 16.6	On-site verification of personnel training records will ensure that all staff providing direct care to students are receiving trainings in medication side-effects and precautions, by March 1, 2007.
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 Observation	All facilities are available to all students.			
13.4			All programs and appropriate			

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(Formerly 13.3) Physical Facility/ Architectural Barriers 18.04(8)	√	Observation Interviews	buildings are accessible to students with limited physical mobility.	√		
14.3 Toileting Procedures and Individual Plans 18.03(8)	√	Documentation	The written toileting procedures contain all required elements, and are included in the Policies and Procedures Manual.			
15.1 Parental Involvement and Parents' Advisory Group 18.05(4)(a)	√	Documentation	Written notices are sent to encourage parental involvement and quarterly Parents' Advisory Group meetings.			
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		Documentation Interviews		√	The policy does not address methods of distribution.	A policy containing all required elements must be submitted, by March 1, 2007.

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26.02(2)	√			√		
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	The policy contains all required elements and is included in the Policies and Procedures Manual.			
16.1 Health Care Policy and Procedure Manual 18.05(9)(c) 18.05(9)(d)	√	Documentation	The Health Care Manual was submitted and signed by a physician.			
16.6 Administration of Antipsychotic Medication	√	Documentation	The policy is included with the admissions packet.	√	All staff providing direct care to students are not receiving annual mandated trainings in medication side-effects	On-site verification of personnel training records will ensure that all staff providing direct care to students are receiving trainings in

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18.05(9)(f)(9)	√			√	and precautions. See 12.2(d)	medication side-effects and precautions, by March 1, 2007.
16.7 Preventive Health Care 18.05(9)(f)(9) (h)	√	Documentation	The policies which include postural screening, communicable diseases, and the provision of locked, secure cabinets, are in the Health Care Manual.			
16.10 Meningococcal Disease and Vaccination MGL, Chapter 76, s.15D 105 CMR 220.700		Documentation		√	The policy is not included in the Health Care Manual.	On-site verification of the Health Care Manual will ensure that the policy is included by March 1, 2007.
18.2 Student Records 28.09(10) MGL c. 71, s. 34H 603 CMR 23.00 Family Educational Rights and Privacy Act	√	Student Records	The student records contain all required elements.			

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(FERPA)	√			√		