



The Commonwealth of Massachusetts Department of Education

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November 16, 2007

Paul O'Shea
Health and Education Services
Cornerstones School
131 Rantoul Street
Beverly, MA 01915

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

Dear Mr. O'Shea:

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 November 29, 2005. 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 **May 19, 2008**. 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

December 3, 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 781-338-3701.

Sincerely,

Diane L. Chadwell, Program Review Follow-up Chairperson
Program Quality Assurance Services

Darlene Lynch, Director
Program Quality Assurance Services

c: Jeffrey Nellhaus, Acting Commissioner of Education
Jennifer Beloff, Local Program Review Coordinator, Cornerstones School

Encl.: Follow-up Monitoring Report
Provisional Private School Approval Certificate, Expiration Date: May 19, 2008

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

Health and education Services, Inc. – Cornerstones Residential and Day Schools

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

Action Plan Submitted on January 2006 and resubmitted January 22, 2007

Progress Reports Submitted on May 14, 2007 and July 16, 2007

Onsite Visit Conducted on October 15 and 16, 2007

Date of this Report November 16, 2007

| 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 |
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| Selected Approved Private School Mid-cycle Review Criteria | | | | | | |
| 2.2 Approvals, Licenses, Certificates of Inspection 18.04(1); 28.09(2)(b)(5); 28.09(5)(b); 28.09(6)(b, c) | √ | Documentation | Both Cornerstones Schools' sites have all current and required licenses, approvals, and certificates of inspection by state and local agencies. | | | |

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| 2.3 EEC Licensure 102 CMR 3.00 <i>(NA for Public Day Schools)</i> | √ | Documentation | Cornerstones has a current, full license from the Department of Early Education and Care to operate a residential school. | | | |
| 7.4 High School Diplomas and Certificates of Attendance M.G.L. c. 69, § 1D; Administrative Advisory SPED 2002-4-REVISED: Special Education Students in Out-of-District Placements- Participation in MCAS Testing and | | | This criterion is not applicable to Cornerstones schools because the programs do not enroll high school students. | | | |

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| High School Graduation Standards | | | | | | |
| 8.4 Program Modifications and Support Services for Limited English Proficient Students M.G.L. c. 71A; Title VI | partially | Documentation, Interview, and Student Record Review | Cornerstones has developed a policy and procedures for program modifications and support services for limited English proficient students. | partially | Record reviews indicated that the program suspects that one of their enrolled students may be limited English proficient. The program has not arranged an appropriate assessment of the student to determine whether the student is LEP and needs support services. | Submit evidence to the Department by January 31, 2008 , that the student who is suspected to be LEP has been appropriately assessed and if determined LEP describe the services that are being provided to him. |
| 8.5 Current IEP & Student Roster 28.09(5)(a) | √ | Documentation and Student Record Review | Cornerstones submitted the current student IEP roster containing all required elements. | | | |
| 8.8 | | | | | | |

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| IEP – Progress Reports State: 28.07(3); Federal 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)(viii) 34 CFR 300.320(a)(3)(i, ii) | √ | Documentation, Interview, and Student Record Review | | √ | Cornerstones’ policy regarding progress reports does not describe how the program documents that parents’ school districts and/or agencies receive copies of progress reports. Additionally, the programs’ progress reports do not always address the students’ goals and benchmarks. It is not always clear whether the student is making progress toward the annual goal. | Submit to the Department by January 31, 2008 , a copy of the revised policy regarding progress reports including all required elements. Provide evidence by May 5, 2008 , that staff have been trained regarding appropriately writing progress reports and submit a copy of the most recent progress reports from a sample of 5 student records. |
| 9.1(a) Student Separation resulting from Behavior Management 18.05(5)(i); 46.02(5)(b) | √ | Documentation and Observation | Cornerstones guidelines for Student Separation /Time Out include all required elements. | | | |

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| 11.3 Educational Administrator Qualifications 28.09(5)(a); 28.09(7)(a); 603 CMR 44.00 | √ | Documentation | The Educational Administrator at Cornerstones has the required qualifications to serve in this position. | | | |
| 11.4 Teachers (Special Education Teachers and Regular Education Teachers) 18.05(11)(f); 28.09(5)(a); 28.09(7)(b, c) | √ | Documentation | Cornerstones has a teacher roster that indicates all teachers are licensed or on an approved waiver. | | | |

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| 11.5 Related Services Staff 28.09(7)(d) | √ | Documentation and Personnel File Review | | √ | Cornerstones was approved to have a .75 FTEs Occupational Therapist, UFR 111. The program has instead hired a Certified Occupational Therapist Assistant Currently the COTA receives supervision from a contracted Occupational Therapist. | Submit to the Department by January 31, 2008 , evidence that the program has hired an Occupational Therapist. |
| 11.6 Master Staff Roster 28.09(7) | √ | Documentation | Cornerstones submitted a copy of its master staff roster including all required elements. Please see 11.5 above regarding the occupational therapists qualifications. | | | |
| 12.2(c) Details about Required Training-CPR | √ | Documentation | Cornerstones has an appropriate plan for staff training for CPR certifications. | | | |

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| Certification 18.05(9)(e) | | | | | | |
| 14.4 Visiting, Mail and Telephones (Residential Schools Only) 18.03(9)(a) and (b) | √ | Documentation | Cornerstones' policy regarding visiting, mail and telephones includes all required elements. | | | |
| 16.3 Nursing 18.05(9)(b) | √ | Documentation and Interview | Cornerstones has Registered Nurses available for student health care. | | | |
| 16.11 Student Allergies 18.05(9)(h) | √ | Documentation and Student Record Review | Cornerstones' policy regarding student allergies includes all required elements. | | | |

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| 16.12 No Smoking Policy M.G.L. c. 71, § 37H | ✓ | Documentation and Observation | Cornerstones' No Smoking Policy includes all required elements. | ✓ | | |
| Identified Areas of Non-Compliance During Previous Program Review or Other Areas of Concern | | | | | | |
| 3.1 Policies & Procedures Manual 28.09(11)(b) | ✓ | Documentation | Cornerstones' Policies and Procedures Manual includes all required policies. Notice is provided to parents of enrolled students that copies of the policies and procedures are available upon request. | | | |

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| 3.2 Health Care Manual 18.05 (9) | √ | Documentation | | √ | Cornerstone's has developed Toileting Procedures, however, the policy has not been included in the Health Manual. | Submit to the Department by January 31, 2008 , a copy of the Health Manual table of contents containing the Toileting Procedures. |
| 4.5 Immediate Notification 18.03(10); 18.05(7); 28.09(12) (a, b) | √ | Documentation and Student Record Review | Cornerstone's policy regarding immediate notification to the parent, the public school district, any state agency involved in the student care or placement, and the Department of Education of all serious incidents includes all required types of incidents. | | | |
| 6.1 Daily Instructional Hours 603 CMR | √ | Documentation | Cornerstones offers the required number of instructional hours. | | | |

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| 27.00; 28.09(9)(a) | | | | | | |
| 7.3 State/District Wide Assessments 28.09(9)(d) | √ | Documentation and Student Record Review | Cornerstones has a written procedure for ensuring that all students participate in MCAS and/or alternate assessment. | | | |
| 9.3 Runaway Students 18.03(10) | √ | Documentation and Student Record Review | Cornerstones has a policy and procedures appropriate for the school population and location for handling students who run away. | | | |
| 9.4 Physical Restraint 18.05(5); 603 CMR 46.00 | √ | Documentation and Student Record Review | Cornerstones Day School has a physical restraint policy that complies with state regulations 603 CMR 46.00. | | | |

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| 10.2 Age Range 28.06(6)(f, g) | ✓ | Documentation | All of Cornerstones instructional groupings are within required age range limits. | ✓ | | |
| 11.1 Personnel Policies and Procedures Manual 18.05(11); 18.05(11)(c)(1); 28.09(7); 28.09(11)(a); M.G.L. c. 71, § 38R; DOE Advisory on CORI revised 5/7/07 | | Documentation and Personnel File Review | | ✓ | Cornerstones' Personnel Policy and Procedures include all required policies except a statement that Criminal Offender Record Information checks (CORIs) will be conducted for all staff every three years after the they are hired. | Submit to the Department by May 5, 2008 , a copy of the Personnel Policies and Procedures including the revised CORI policy. |
| 12.2 In-Service Training Plan and Calendar | ✓ | Documentation and Personnel File Review | Cornerstones has a written training plan for all staff that covers all mandated training topics. | | | |

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| 28.09(7)(f); 28.09(9)(b); 28.09(10); 18.03(3); 18.05(9)(e)(1); 18.05(10); 18.05(11)(h) Title VI: 42 U.S.C. 2000d; 34 CFR 100.3; EEOA: 20 U.S.C. 1703(f); Title IX: 20 U.S.C. 1681; 34 CFR 106.31-106.42; M.G.L. c. 76, § 5; 603 CMR 26.00, esp. 26.07(2, 3) | | | | | | |
| 12.2(a) Details about Required Training - Behavior Management | | Documentation | | √ | Cornerstones' procedures regarding behavior management do not include procedures for obtaining and recording | Submit to the Department by January 31, 2008 , a copy of the revised Behavior Management Policies and procedures including all |

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| and Restraint Training 18.05(5, 6, 7) | | | | | data regarding student discipline and behavior along with a description of how such data will be integrated into IEP Team discussions or procedures for obtaining parental consent for behavior management procedures. | required elements. |
| 13.7 Library/Resource Room 18.04(6)(b) | √ | Documentation, Interview, and Observation | Cornerstones has a library with materials and resources appropriate for enrolled students at each site. Additionally, the program indicated that both sites use the local public library for research projects. | | | |
| 15.3 Information to be translated into Languages other than English | √ | Documentation and Student Record Review | Cornerstones has translated its student code of conduct and parental consent forms into Spanish. The program provided copies of letters and notices that have been | | | |

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| Title VI; EEOA: 20 U.S.C. 1703(f); M.G.L. c. 76, § 5; 603 CMR 26.02(2) | | | translated for parents whose primary language is not English. | | | |
| 15.5 Parent Consent 18.05(5)(c); 18.05(8); 18.05(9)(f)(1) | √ | Documentation and Student Record Review | Cornerstones has established a process to request required annual parental consents and a process to log the receipt of the consents and follow-up to obtain consents that have not been returned. | | | |
| 16.5 Administration of Medication 18.05(9)(f) | √ | Documentation | Cornerstone's policy and procedures regarding Medication Administration includes all required elements. | | | |

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| | | | | | | |
| 16.7 Preventive Health Care 18.05(9)(g) | √ | Documentation | Cornerstones' Preventive Health Care Policy includes all required elements. | | | |
| 17.1 Transportation Safety 28.09(11)(b) | √ | Documentation and Personnel File Review | Cornerstones' Transportation Safety procedures includes all required elements. | | | |
| 18.1 Confidentiality of Student Records 28.09(5)(a); 28.09(10); 23.07(1); M.G.L. c. 71, § 34H | partially | Documentation and Student Record Review | Cornerstones has developed a log of access including all required information. | partially | At this time, Cornerstones has not implemented the revised log of access. | Submit to the Department by May 5, 2008 , a copy of the new access logs from a sampling of 5 student records, where the records have been accessed by third parties. |