



Massachusetts Department of Elementary and Secondary Education

350 Main Street, Malden, Massachusetts 02148-5023

Telephone: (781) 338-3700
TTY: N.E.T. Relay 1-800-439-2370

January 11, 2008

Dr. Robert F. Littleton, Jr.
345 Fortune Boulevard
Milford, MA 01757

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

Dear Dr. Littleton:

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 October 11, 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 Elementary and Secondary Education found certain noncompliance issues to be resolved, there were, however, two remaining issues found by the Department's onsite Team. Because there are only two remaining criteria that needs to be addressed, the Department is issuing a "Full Approval" status effective from the date of this letter and indicated on your approval certificate. Your "Full Approval" will expire on **August 31, 2011**.

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 1, 2008.

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 781-338-3792.

Sincerely,

Stacey Klasnick, Program Review Follow-up Chairperson
Program Quality Assurance Services

Darlene Lynch, Director
Program Quality Assurance Services

c: Jeffrey Nellhaus, Acting Commissioner of Education

Encl.: Follow-up Monitoring Report
Full Private School Approval Certificate, Expiration Date: August, 2011

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

Evergreen Center, Inc.

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

Action Plan Submitted on November 23, 2005
Progress Reports Submitted on February 24, 2006
Onsite Visit Conducted on November 15, 2007
Date of this Report January 11, 2008

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
Selected Approved Private School Mid-cycle Review Criteria						
2.2 Approvals, Licenses, Certificates of Inspection 18.04(1); 28.09(2)(b)(5);	√	Documentatio n	The Evergreen Center, Inc. submitted all current approvals, licenses, and certificates of inspection.			

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
28.09(5)(b); 28.09(6)(b, c)						
2.3 EEC Licensure 102 CMR 3.00 (NA for Public Day Schools)	√	Documentation	The EEC licensures are current for the residential program.			
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-	√	Documentation	Due to the severity of disabilities served, the majority of students at the Evergreen Center participate in alternative assessments in a portfolio format based on the Massachusetts Curriculum Frameworks. The Evergreen Center, Inc. policy states that it ESEs not issue High School Diplomas or Certificates of Attendance and that it its the responsibility of the sending district to determine whether eligibility for graduation has been met in accordance with the Department of Elementary			

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
Participation in MCAS Testing and High School Graduation Standards			and Secondary Education in the student's state of residence.			
8.4 Program Modifications and Support Services for Limited English Proficient Students M.G.L. c. 71A; Title VI		Documentation		√	The Evergreen Center, Inc.'s written policy for working with the public school districts to implement necessary program modifications and support services to identify and effectively serve limited English proficient (LEP) students ESEs not meet any of the requirements stated in the criterion.	The Evergreen Center, Inc. must develop a written plan for working with the public school districts to implement necessary program modifications and support services to identify and effectively serve limited English proficient (LEP) students such as sheltered content instruction and additional instruction in English as a Second Language and include the plan in the Policies and Procedures Manual.
8.5 Current IEP & Student Roster	√	Documentation Student Records	The current IEP and student roster is complete and contains all required elements.			

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
28.09(5)(a)	√			√		
8.8 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 Student Records	Progress reports include written information on the student’s progress toward the annual goals in the IEP and copies of the progress reports are sent to parents and the public schools.			
9.1(a) Student Separation resulting from Behavior Management 18.05(5)(i); 46.02(5)(b)	√	Documentation Student Records	The Evergreen Center, Inc. has written behavior management policies and procedures regarding student separation that is included in the Policies and Procedures Manual.			
11.3 Educational Administrator	√	Documentation Personnel	The Educational Administrator meets the required qualifications.			

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
Qualifications 28.09(5)(a); 28.09(7)(a); 603 CMR 44.00	√	Records				
11.4 Teachers (Special Education Teachers and Regular Education Teachers) 18.05(11)(f); 28.09(5)(a); 28.09(7)(b, c)	√	Documentation Personnel Records	The teacher roster is complete and all teachers are currently licensed or waived.			
11.5 Related Services Staff 28.09(7)(d)	√	Documentation Personnel Records	The related service roster is complete and all related service providers are currently licensed or certified in their respective areas. The Evergreen Center will ensure that any staff members providing educational			

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
			interpreting for students who are deaf or hard of hearing in public schools, approved special education schools and collaborative must be registered through the Massachusetts Commission for the Deaf and Hard of Hearing. This includes staff members who are identified as educational interpreters or oral transliterators or someone who fulfills that role but is not identified as an interpreter.			
11.6 Master Staff Roster 28.09(7)	√	Documentation	The master staff roster is complete and contains all required elements.			
12.2(c) Details about Required Training-CPR Certification	√	Documentation Interview	The written training plan for CPR Certification identifies the staff position/titles of staff to be trained, how many staff to be trained, how many staff in each position/title will be trained, and the frequency 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</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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
18.05(9)(e)			CPR training and certification.			
14.4 Visiting, Mail and Telephones (Residential Schools Only) 18.03(9)(a) and (b)	√	Documentation	The Evergreen Center, Inc. has written visiting, mail and telephone policies and procedures that are included in the Policies and Procedures Manual.			
16.3 Nursing 18.05(9)(b)	√	Documentation	The nurses meet the required qualifications. The nurses' shift schedules and explanations of how the nurses' availability is sufficient for the needs of the student population is included in the Health Care Manual.			
16.11 Student Allergies 18.05(9)(h)	√	Documentation	The Evergreen Center, Inc. has a written student allergies policy that is included in the Health Care Manual.			

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
16.12 No Smoking Policy M.G.L. c. 71, § 37H	√	Documentation	The Evergreen Center, Inc. has a written smoking policy that is included in the Health Care Manual.	√		

Identified Areas of Non-Compliance During 2005 Program Review or Other Areas of Concern

3.2 Health Care Manual 18.05 (9)	√	Documentation	The Evergreen Center, Inc. has a Health Care Manual that is clearly labeled and contains all required elements.			
5.1 Student Admissions 28.09(11); 18.05(1)(b)(1-17); 18.05(2)	√	Documentation Student Records	The Evergreen Center Inc. has written admissions criteria included in the Policies and Procedures Manual which includes obtaining restraint consents for all students.			

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
9.7 Terminations 18.05(7); 28.09(12)(b)		Documentation		√	The Evergreen Center Inc. is currently revising its suspension and termination policies and procedures to be submitted to the Department for review.	The Evergreen Center Inc. will submit revised suspension and termination policies and procedures and include the revision in its Policies and Procedures Manual.
12.2 In-Service Training Plan and Calendar 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	√	Documentation Personnel Records	All staff participate in annual in-service training on an average of twenty-four hours and the in-service training plan includes all the required elements. The Evergreen Center, Inc. maintains an agenda for each training topic and a roster of attendees for each training session.			

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 Elementary and Secondary Education and Timelines for Implementation and Further Progress Reporting
106.31-106.42; M.G. L. c. 76 5; 603 CMR 26.00, esp. 26.07(2,3)	√					
15.5 Parent Consent 18.05(5)(c); 18.05(8); 18.05(9)(f)(1)	√	Documentation	The Evergreen Center, Inc. maintains all required annual parent consents for each student enrolled in the program.			