



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

March 5, 2008

Paul O'Shea
Health & Education Services, Inc.
Solstice 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 Elementary and Secondary 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 August 25, 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 **March 21, 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 781-338-3701.

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 Elementary and Secondary Education
Michael Shea, Chairperson, Board of Directors
Linda Hart, Local Program Review Coordinator

Encl.: Follow-up Monitoring Report
Provisional Private School Approval Certificate, Expiration Date: August 25, 2008

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

Health & Education Services, Inc. – Solstice Day School

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

Action Plan Submitted on November 3, 2006

Progress Reports Submitted on May 15 and June 28, 2007

Onsite Visit Conducted on November 19, 2007

Date of this Report March 5, 2008

Progress Reports due: April 30, 2008, May 30, 2008, and September 15, 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 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
	√			√		

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	Solstice submitted all required inspections and school committee approval.			
---	---	-------------------	--	--	--	--

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)(b); 28.09(6)(b, c)	√			√		
2.3 EEC Licensure 102 CMR 3.00 (NA for Public Day Schools)	NA		This criterion is not applicable to Solstice because the program is approved as a day school only.			
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	√	Documentation	Solstice submitted a policy regarding high school diplomas and certificates of attendance including 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
Placements- Participation in MCAS Testing and High School Graduation Standards	√			√		
8.4 Program Modifications and Support Services for Limited English Proficient Students M.G.L. c. 71A; Title VI		Documentation		√	The policy submitted by Solstice regarding Program Modifications and Support Services for LEP students is not clear regarding the responsibility of the LEA versus Solstice. The liaison will send minimum elements that must be included in the policy to Solstice to use in developing its policy.	Submit to the Department by April 30, 2008 , a revised policy regarding Program Modifications and Support Services for LEP students.
8.5 Current IEP & Student Roster 28.09(5)(a)	√	Documentation	Solstice submitted the current student IEP roster containing 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
8.8 IEP – Progress Reports State: 28.07(3); Federal 20 U.S.C. Chapter 33, Section 1414(d)(1)(A)(vii i) 34 CFR 300.320(a)(3)(i, ii)	partial	Documentation and student record review	Solstice submitted a new policy that includes all required elements.	partial	Record reviews indicated that not all progress reports include written information on the student’s progress toward the annual goals in the IEP and progress reports are not sent to parents and school districts as often as reports are sent to parents of regular education students.	Submit to the Department by April 30, 2008 , a copy of the most recent progress reports sent to parents and LEAs from a sample of 5 student records, including evidence of when the progress report was sent and to whom. Include information regarding the programs policy regarding how often and when progress reports are sent. Submit to the Department by May 30, 2008 , a summary of a self-assessment regarding progress reporting during the last academic year 2007-2008. The self-assessment must include the review of at least 20 student records. The summary must include how

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
	√			√		<p>many student records were reviewed, how many of these records had progress reports sent to parents and districts as often as reports are sent to parents of regular education students, and how many of the progress reports include written information on the student's progress toward the annual goals.</p>
9.1(a) Student Separation resulting from Behavior Management 18.05(5)(i); 46.02(5)(b)		Documentation		√	<p>The policy submitted by Solstice ESEs not include the requirements of this criterion. Please include all elements of this criterion under the Student Separation Policy, including any information regarding student separation that is found in the Behavior Management and Physical Restraint</p>	<p>Submit to the Department by April 30, 2008, a revised policy for Student Separation.</p>

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
	√			√	policies.	
11.3 Educational Administrator Qualifications 28.09(5)(a); 28.09(7)(a); 603 CMR 44.00	√	Documentation	The interim Educational Administrator at Solstice 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	The teacher roster submitted by Solstice indicates that as of February 22, 2008 all teachers are appropriately licensed or waived.			

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
	√			√		
11.5 Related Services Staff 28.09(7)(d)	√	Documentation	Solstice's related services providers are appropriately licensed.			
11.6 Master Staff Roster 28.09(7)		Documentation		√	<p>Solstice provided a master staff roster including all current employees of the program. The program did not provide a copy of its last approved budget. The ESE liaison, therefore, was not able to compare the approved UFR positions with the budget that was approved by ESE.</p>	<p>Solstice has provided the Department with notice that it intends to reconstruct its program. The new budget and master staff roster will be reviewed at that time.</p>

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
	√			√		
12.2(c) Details about Required Training-CPR Certification 18.05(9)(e)	√	Documentation	Documentation requirement contained in 12.2. Solstice provided the name and qualifications of the certified instructor providing the CPR training.			
14.4 Visiting, Mail and Telephones <i>(Residential Schools Only)</i> 18.03(9)(a) and (b)	NA		This criterion is not applicable to Solstice because the program is approved as a day school only.			
16.3 Nursing 18.05(9)(b)	√	Documentation	Solstice has a Registered Nurse available for student health care.			

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
	√			√		
16.11 Student Allergies 18.05(9)(h)	√	Documentation	Solstice's policy regarding student allergies includes all required elements.			
16.12 No Smoking Policy M.G.L. c. 71, § 37H	√	Documentation	Solstice's No Smoking Policy includes all required elements.			
Identified Areas of Non-Compliance During 2005 Program Review or Other Areas of Concern						
1.2 Program & Student Description, Program Capacity		Documentation		√	The description submitted by Solstice ESEs not include the following: <ul style="list-style-type: none"> Operational capacity, current and 	Submit to the Department by May 30, 2008 , a revised program and student description including all of the 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(2)(b)(2, 3, 7)					maximum enrollment, <ul style="list-style-type: none"> • A clear description of how self-help, daily living skills services are implemented. (It is not clear what skills the program works on, if any.), • A clear description of how services for social/emotional needs services are implemented. • A clear description of the types of supplementary aids and services that are available for students. <p>The program's description of the North Star Adventure program should be included as an</p>	

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
					“Other” rather than as a “supplemental service.”	
3.1 Policies & Procedures Manual 28.09(11)(b)	partial	Documentation	Solstice submitted its Policy and Procedures Manual including all required policies.	partial	The letter that was submitted as evidence of annual notification to parents ESEs not state that parents may review the programs Policies and Procedures Manual at any time and how they would access it.	Submit to the Department by April 30, 2008 , evidence that parents have been notified that the policies and procedures are available to be reviewed by them at any time and how they would obtain access to them. Also, please describe how the program intends to notify the parents annually of their right to review the policies and procedures at any time.
3.1(c) Child Abuse Reporting 18.05(9)(i); M.G.L. c. 119, §§ 51A and B;	√	Documentation	Solstice submitted a child abuse reporting policy and procedures and a description of its training regarding child abuse reporting.			

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
M.G.L. c. 19C	√			√		
3.2 Health Care Manual 18.05 (9)	√	Documentation	Solstice maintains a health care manual including all required items. The manual has been approved by its consulting physician			
4.4 Advance Notice of Proposed Program/Facility Change 28.09 (5)(c)	√	Documentation	Solstice’s policy regarding Notice of Proposed Program/Facility Change includes all required elements of this criterion.			
4.5 Immediate Notification 18.03(10); 18.05(7); 28.09(12) (a, b)	√	Documentation	Solstice’s policy regarding Immediate Notification includes all required elements of this criterion.			

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
5.1 Student Admissions 28.09(11); 18.05(1)(b)(1-17); 18.05(2)		Documentation	Solstice’s admission policy includes all required elements of this criterion.	√	<p>The material submitted by Solstice, which it provides to parents and districts prior to a student’s enrollment includes a copy of the “Notice of Procedural Safeguards, instead of “parent’s rights as described in 18.05(9).” Please review 18.05(4).</p> <p>The submission ESEs not include the following:</p> <ul style="list-style-type: none"> • A written description of normal daily routines, • A description of the treatment strategy employed by the facility, or • A description of any 	Submit to the Department by May 30, 2008 , a revised packet of information provided to parents and districts prior to enrollment of the student.

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
	√			√	normally occurring religious practices or a clarification for ESE that there are none.	
6.1 Daily Instructional Hours 603 CMR 27.00; 28.09(9)(a)	√	Documentation	Solstice offers the required number of instructional hours.			
6.4 School Days Per Year 603 CMR 27.05(2); 28.09(9)(a)	√	Documentation	Solstice offers the required number of school days.			
8.10 IEP- Less Restrictive Placement	√	Documentation	Solstice provided its policy regarding least restrictive environment including all			

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(9)(c)	√		requirements.	√		
8.11 IEP - Transition Planning 34 CFR 300.347(b)(1, 2)	√	Documentation	Solstice submitted its policy regarding transition planning.			
9.3 Runaway Students 18.03(10)	√	Documentation	Solstice’s policy regarding runaways includes all required elements.			
9.5 3-5 Day Suspensions 18.05(6)	√	Documentation	Solstice submitted its suspension policy including all required elements.			
9.7 Terminations 18.05(7); 28.09(12)(b)	√	Documentation	Solstice submitted its policies regarding planned and unplanned terminations including all requirements.			

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
10.1 Student:Teacher Ratios 26.06(6)(d); 28.09(7)(e)	partial	Documentation and Observation	Solstice submitted current block schedules indicating that no instructional grouping exceeds a student/teacher ratio of 8 to 1.	partial	Observation of classrooms during the mid-cycle review indicated that one classroom had a student teacher ratio of 9 to 1, above the required ratio.	Submit to the Department by May 30, 2008 , a copy of the current block schedule with student initials, teacher's name and assistant for each period.
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; ESE Advisory on CORI revised 5/7/07	√	Documentation	Solstice's Personnel Policies and Procedures include 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
	√			√		
11.7 Job Descriptions 18.05(11)(d)	√	Documentation	Solstice submitted copies of its job descriptions for all staff including the UFR position numbers.			
11.10 Supervision of Direct Care Day & Residential Staff 18.03(4)	√	Documentation	Solstice schedules weekly conferences between day school and residential staff to discuss those students who attend the day school and reside in Solstice's group home.			
12.1 Staff Orientation and Training 18.05(11)(g, i); 28.09(7)(f)	√	Documentation	Solstice submitted its orientation checklist including all required topics.			

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
	√			√		
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 106.31- 106.42; M.G.L. c. 76, § 5; 603 CMR 26.00, esp. 26.07(2, 3)		Documentatio n and Personnel files		√	The training plan submitted by Solstice ESEs not include the reporting of abuse of older students to the Disabled Persons Protection Commission. The training calendar ESEs not include the following: <ul style="list-style-type: none"> • Child Abuse reporting to DSS and the DPPC, and • Runaway policy. The onsite team was not able to verify through personnel file reviews that staff had received all required trainings.	Submit to the Department by April 30, 2008 , a copy of the revised calendar of trainings including all required trainings Submit to the Department by September 15, 2008 , a copy of the training schedule for the 2008-2009 school year.

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
	√			√		
12.2(a) Details about Required Training - Behavior Management and Restraint Training 18.05(5, 6, 7)	√		Documentation requirement contained in 12.2.			
12.2(d) Details about Required Training- Medication Training 18.05(9)(f)(3)(c)	√		Documentation requirement contained in 12.2.			
12.2(f) Details about Required		Documentation		√	Solstice indicated that it has not completed	Submit to the Department by April 30, 2008 , a copy of the

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
Training-Emergency Procedures 18.05(10); 28.09(11)	√				quarterly evacuations. The program has scheduled evacuation drills for the end of February, the end of April, mid June and early September.	written logs for the February and April evacuation drills including date, time elapsed, participants, witnesses, etc. Submit to the Department by May 30, 2008 , a copy of the written logs for the June evacuation drill including date, time elapsed, participants, witnesses, etc. Submit to the department by September 15, 2008 , a copy of the log from any evacuation drills conducted during the summer program.
13.2 Description of Physical Facility 18.04; 28.09(8)	√	Documentation	Solstice provided a description of its physical facility.			

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
	√			√		
13.7 Library/Resource Room 18.04(6)(b)	√	Documentation	Solstice provided a description of its library/resource room.			
14.2 Food and Nutrition 18.03(7)	√	Documentation	Solstice's plan for preparation and serving of food includes all required items of this criterion.			
14.3 Toileting Procedures and Individual Plans	√	Documentation	Solstice's plan for toileting procedures includes all required items of this criterion.			
15.1 Parental Involvement and Parents' Advisory Group	partial	Documentation	Solstice has developed a policy regarding Parent Involvement and Parents' Advisory Group (PAG). The	partial	While it appears that the program is beginning to organize a PAG, there is no evidence that a PAG	Submit to the Department by April 30, 2008 , a copy of the agenda and sign-in sheet from the PAG meeting in March and

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(4)(a)	√		program provided a copy of a letter that was sent to the parents indicating that a parent meeting will be scheduled in March.	√	has met previously.	a calendar of the future scheduled 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, § 5; 603 CMR 26.02(2)	√	Documentation	Solstice provided a plan for the translation of documents into the home language for parents who are limited English proficient.			
15.5 Parent Consent 18.05(5)(c); 18.05(8); 18.05(9)(f)(1)		Documentation		√	Solstice's policy and procedures regarding consents ESEs not include information regarding the Parental Notification Law.	Submit to the Department by May 30, 2008 , a copy of the consent form regarding the Parental Notification Law.
16.4 Emergency First Aid and	√	Documentation	Solstice's policies and			

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
Medical Treatment 18.05(9)(e, f)	√	n	procedures for emergency first aid and care include all required elements of this criterion.	√		
16.5 Administration of Medication 18.05(9)(f)	√	Documentation	Solstice's policy and procedures for administration of medication include all required elements of this criterion.			
16.6 Administration of Antipsychotic Medication 18.05(9)(f)(9)	√	Documentation	Solstice's policy and procedures for administration of antipsychotic medication include all required elements of this criterion.			
16.7 Preventive Health Care 18.05(9)(g)	√	Documentation	Solstice's policy and procedures for preventive health care include all required elements of this criterion.			
17.1						

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
Transportation Safety 28.09(11)(b)	✓ ✓	Documentation	Solstice's submitted its Transportation Policy and Procedures that ensure that vehicles are safe, insured and operated by qualified and trained individuals.	✓		
18.1 Confidentiality of Student Records 28.09(5)(a); 28.09(10); 23.07(1); M.G.L. c. 71, § 34H	partial	Documentation and student records	Solstice's current log of access includes all required elements.	partial	Student record reviews indicated that there is not a log of access in each of the student records.	Submit to the Department by May 30, 2008 , a summary of the program's own review of each student's record to determine whether each record includes a copy of the new log of access. The summary must include the number of records reviewed, the number of records that did not have the new log of access, and the steps taken to correct the concern if all of the records do not have the new log of access.