



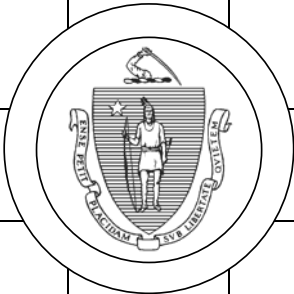
Massachusetts Department of
**ELEMENTARY & SECONDARY
EDUCATION**

Bay Cove Academy

PRIVATE SPECIAL EDUCATION SCHOOL PROGRAM REVIEW REPORT OF FINDINGS

**Dates of Onsite Visit: June 8-10
Date of Draft Report: July 8, 2009
Date of Final Report: July 21, 2009
Corrective Action Plan Due: September 8, 2009**

**Department of Elementary and Secondary Education Onsite Team Members:
Mary Howard, Chairperson
Stacey Klasnick**



**Mitchell D. Chester, Ed.D.
Commissioner of Elementary and Secondary Education**

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION
PRIVATE SPECIAL EDUCATION SCHOOL PROGRAM REVIEW**

Bay Cove Academy

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MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION

APPROVED PRIVATE SCHOOL PROGRAM REVIEW REPORT

OVERVIEW OF REVIEW PROCEDURES

INTRODUCTION

The Massachusetts Department of Elementary and Secondary Education is required under M.G.L. c. 71B, §10 to review special education programs in approved private special education schools that serve publicly funded students under the provisions of Board of Elementary and Secondary Education Regulations 603 CMR 28.00 and 18.00. Each private school submits an application for approval by the Department of Elementary and Secondary Education and periodically updates information included in the application on how special education services are provided. Each year, the Department's Program Quality Assurance Services unit conducts onsite visits to selected approved private schools to verify the implementation of their applications. The selected schools for 2008-2009 review cycle were notified in August 2008 of scheduled visits and were encouraged to assess themselves before the arrival of the Department's visiting team.

The statewide six-year Private School Program Review cycle together with the Department's Mid-cycle follow-up monitoring schedule is posted on the Department's web site at <http://www.doe.mass.edu/pqa/review/psr/6yrcycle.html>.

Private School Program Review Elements

Team: Depending upon the size of a private school and the number of programs to be reviewed, a team of two to three Department staff members conducts a Program Review over two to five days in the private school. In some instances, Massachusetts' human service agency staff may also participate on the visiting team.

Scope: All approved private schools in the Commonwealth are monitored through the Department's Private School Program Review system on a six-year cycle with an additional mid-cycle follow-up visit. This six-year monitoring and follow-up cycle is coordinated with the Department's Approved Private School Application Renewal procedures.

Content: The Program Review criteria encompass key elements drawn from 603 CMR 18.00 and 28.00 and the private school's application for approval. The elements selected for the 2005-2006 reviews also include those required by the federal Office for Special Education Programs (OSEP) and revised requirements of the Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 *et seq.* (IDEA-2004) as described in the Department's Special Education Advisories. Selected Program Review compliance criteria are aligned with the requirements and goals of the Massachusetts Education Reform Act of 1993, being intended to promote high standards and achievement for all students.

Report: The Department's Program Review Report is based on a review of documentation regarding the operation of the school's programs, together with information gathered through the following Department program review methods:

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- Interviews of administrative, clinical, instructional and support staff across all grade levels.
- Interviews of Parent Group representatives.
- Other interviews as requested by personnel from state and local agencies and members of the general public.
- Review of student records: A sample of student records is selected for detailed review by the Department of Elementary and Secondary Education. Student records are examined first by the school's staff and then verified by the onsite team using standard Department student record review procedures in order to make determinations regarding the implementation of procedural and programmatic requirements. Parents of students whose files were selected for the record review are provided an opportunity to be interviewed by telephone.
- Observation of classrooms and other facilities: Instructional classrooms and school facilities used in the delivery of programs and services are visited to determine general levels of compliance with program requirements.
- Surveys of parents of students with disabilities. Parents of students with disabilities whose files are selected for the record review, as well as the parents of an equal number of other students with disabilities, are sent a survey that solicits information regarding their experiences with the school's implementation of special education programs, related services, and procedural requirements.

Response: A detailed report of findings describes determinations about the implementation status of each requirement (criterion) reviewed. Included in the findings are commendations for those criteria that have been implemented in an exceptional manner. Where criteria are identified as not fully implemented, the private school must propose corrective action to bring those areas into compliance with the controlling statutes or regulations. **Under new federal *Special Education State Performance Plan* requirements pursuant to IDEA-2004, public and private schools serving disabled students must demonstrate effective resolution of noncompliance identified by the Department as soon as possible but in no case later than one year from the issuance of the Department's Final Program Review Report.**

Private schools are encouraged to incorporate the corrective action into their program improvement planning, as well as their professional and paraprofessional staff development plans.

The Department believes that the Private School Program Review process is a positive experience and that the Final Report is a helpful planning document for the continued development and improvement of programs and services in each approved private school.

REPORT INTRODUCTION

A two-member Massachusetts Department of Elementary and Secondary Education team visited Bay Cove Academy during the week of June 8, 2009 to evaluate the implementation of selected compliance criteria under the Massachusetts Board of Elementary and Secondary Education Regulations 603 CMR 18.00 (Program and Safety Standards for Approved Public or Private Day and Residential Special Education School Programs) and 603 CMR 28.09 (Approval of Public or Private Day and Residential Special Education School Programs), M.G.L c. 71B (“Chapter 766”) and the federal Individuals with Disabilities Education Act, 20 U.S.C. Section 1400 *et seq.*, as amended in 1997 (IDEA-97). The team appreciated the opportunity to interview staff and parents, to observe classroom facilities, and to review the program efforts underway in the school. The review team would like to highlight the following features of the school that were brought to the attention of the Department and that the team believes have a significant and positive impact on the delivery of educational services for students enrolled at Bay Cove Academy. These features are as follows:

- *Bay Cove Academy has a Career Development Department that identifies appropriate career paths for all students. Students participating in the program are placed in internships or job placements where they apply skills learned in school in conjunction with practicing employment skills with job counselors. Bay Cove has designed a series of written evaluation forms that specify areas of strength and areas of improvement which students and their employers complete independently on a monthly basis. The evaluation forms are completed in five progressive phases throughout the students’ placement at Bay Cove Academy. The five phases consist of: Learning Phase, Responsibility Phase, Worker Identity Phase, and Transition Phase. Students review these evaluations regularly with their job counselor.*
- *Bay Cove Academy focuses on the whole child by equally emphasizing academics, social and emotional well being, along with employment opportunities. Through the seamless integration of academic, clinical and employment disciplines, students are able to develop their individual potential, and are held to high standards and expectations. All behavioral expectations are firmly established and are consistently addressed by all staff providing clear and natural consequences for students. Academic courses offered range from life skills to college preparatory curriculum.*
- *Bay Cove Academy initiates follow up and support services with all alumni in the initial year after leaving Bay Cove. This provides the program with important feedback and assists students during their transitions to post secondary education, training and employment.*

The Department is submitting the following Private School Program Review Report containing findings made pursuant to this onsite visit. In preparing this report the team reviewed extensive documentation regarding the operation of the school’s programs, together with information gathered by means of the following Department program review methods:

- Interviews of three administrative staff.
- Interviews of three clinical staff.
- Interviews of six teaching and educational support services staff.

- Interviews of one Parent Group representative and one parent of Massachusetts student enrolled in the school.
- Interviews of one representative of the Board of Directors.
- Student record review: A sample of ten Massachusetts student records was selected by the Department. Student records were first examined by the school's staff and then verified by the onsite team using standard Department of Elementary and Secondary Education student record review procedures to make determinations regarding the implementation of procedural and programmatic requirements.
- Personnel record review: A sample of ten personnel records was selected by the Department. Personnel records were first examined by the school's staff and then verified by the onsite team using standard Department of Elementary and Secondary Education personnel record review procedures to make determinations regarding the implementation of procedural and programmatic requirements.
- Observation of classrooms and other facilities: A sample of five instructional classrooms and other school facilities used in the delivery of programs and services was visited to determine general levels of compliance with program requirements.
- Surveys of parents of students with disabilities: twenty parents of students with disabilities were sent surveys that solicited information about their experiences with the school's implementation of special education programs, related services and procedural requirements. Four of these parent surveys were returned to the Department of Elementary and Secondary Education for review.

The report includes findings organized under the 18 compliance areas listed in the table of contents. The findings explain the "ratings," or determinations by the team about the implementation status of the compliance criteria reviewed within each of the 18 areas. The ratings indicate those criteria that were found by the team to be substantially "Implemented" or implemented in a "Commendable" manner. (Refer to the "Definition of Terms" section of the report.) Where criteria were found to be either "Partially Implemented" or "Not Implemented," the private school must propose to the Department corrective action to bring those areas into compliance with the controlling statute or regulation. In some instances the team may have found certain requirements to be fully "Implemented" but made a specific comment on the school's implementation methods that also may require response from the private school.

The private school is expected to incorporate the corrective action into any program improvement plans, including the school's professional and paraprofessional staff development plan.

BAY COVE ACADEMY

**SUMMARY OF COMPLIANCE CRITERIA INCLUDED IN THIS REPORT
RECEIVING A COMMENDABLE RATING
FROM THE DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

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| 6.2 |
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**SUMMARY OF COMPLIANCE CRITERIA INCLUDED IN THIS REPORT
REQUIRING CORRECTIVE ACTION PLAN DEVELOPMENT
in response to the following
PROGRAM REVIEW REPORT FINDINGS**

| PROGRAM AREA | PARTIALLY IMPLEMENTED | NOT IMPLEMENTED | OTHER CRITERIA REQUIRING RESPONSE |
|---|-----------------------|-----------------|-----------------------------------|
| Area 1: Required Information, Notifications And Postings | | | |
| Area 2: Administration - Legal And Financial Documentation | | | |
| Area 3: Administration - Manuals And Handbooks | | | |
| Area 4: Disclosure Of Information | | | |
| Area 5: Administration and Admissions Procedures | | | |
| Area 6: Educational Program Requirements -- Student Learning Time | | | |
| Area 7: Educational Program Requirements -- Curriculum Frameworks and State Assessments | | | |
| Area 8: Educational Program Requirements -- Individualized Education Programs | 8.8 | | |
| Area 9: Educational Program Requirements -- Student Discipline and Behavior | | | |

| PROGRAM AREA | PARTIALLY IMPLEMENTED | NOT IMPLEMENTED | OTHER CRITERIA REQUIRING RESPONSE |
|--|------------------------------|------------------------|--|
| Management | | | |
| Area 10: Educational Staffing Requirements -- Ratios | | | |
| Area 11: Educational Staffing Requirements -- Personnel Policies | | | |
| Area 12: Educational Staffing Requirements -- Staff Training | | | |
| Area 13: Physical Facility And Equipment Requirements | | | |
| Area 14: Requirements For Daily Care | | | |
| Area 15: Parent and Student Involvement | | | |
| Area 16: Health and Medical Services | | | |
| Area 17: Transportation Safety | | | |
| Area 18: Student Records | | | |

NOTE THAT ALL OTHER CRITERIA REVIEWED BY THE DEPARTMENT THAT ARE NOT MENTIONED ABOVE HAVE RECEIVED AN “IMPLEMENTED” OR “NOT APPLICABLE or NOT RATED” RATING.

DEFINITION OF TERMS
FOR THE RATING OF EACH COMPLIANCE CRITERION

| | |
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| Commendable | The criterion is implemented in an exemplary manner significantly beyond the requirements. |
| Implemented | The requirement or criterion is substantially met. |
| Partially Implemented | The requirement, in one or several important aspects, is not entirely met. |
| Not Implemented | The requirement is totally or substantially not met. |
| Not Applicable or Not Rated | The requirement does not apply to the private school. |

AREA 1: REQUIRED INFORMATION, NOTIFICATIONS AND POSTINGS

| CRITERION NUMBER | Legal Standard |
|---|---|
| <p>1.2 Program & Student Description Program Capacity 28.09(2)(b)(2, 3, 7)</p> | <p>The program provides a narrative is that describes:</p> <ul style="list-style-type: none"> • Identified population of students to be served • Ages of students; • Educational characteristics; • Behavioral characteristics and • Philosophy, goals and objectives. <ul style="list-style-type: none"> • How each of the following educational services are implemented for the described student population of the school: <ul style="list-style-type: none"> ○ The content requirements of the Massachusetts Curriculum Frameworks; ○ Self-help, daily living skills; ○ Social/emotional needs; ○ Physical education; adapted physical education; ○ Pre-vocational, vocational, and career education; ○ English language support (for limited English proficient students) and ○ Other: any other specialized educational service(s) provided by the program. • How each of the following related services is or will be provided for the described student population of the school whose IEPs indicate such services: <ul style="list-style-type: none"> ○ Transportation; ○ Braille needs (blind/visually impaired); ○ Assistive technology devices/services; ○ Communication needs (all students including deaf/hard of hearing students); ○ Physical therapy; ○ Occupational therapy; ○ Recreation services; ○ Mobility/orientation training; ○ Psychological services, counseling services, rehabilitation counseling services, social work services; ○ Parent counseling and training; ○ School health services, medical services and ○ Other (e.g., music therapy, sensory integration therapy). • How the kinds of supplementary aids and services available for students in the program is or will be provided: <ul style="list-style-type: none"> ○ Supplementary aids and services are defined as “those aids and services – which are not ‘specially designed instruction or related services’ – which enable eligible students to be educated to the maximum extent possible with |

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| CRITERION NUMBER | |
| | Legal Standard |
| | <p>non-disabled students.” These may include aids and services that would typically be available in a less restrictive setting, and their availability would be helpful when the student can be placed in a less restrictive placement (e.g., adapted text, enlarged print, graph paper, peer tutor).</p> <p>NOTE: Residential Programs reflect the 24-hour nature of the program and indicate how residential services and educational services will be fully coordinated.</p> |
| | Rating: Implemented RESPONSE REQUIRED: No |

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| AREA 2: ADMINISTRATION - LEGAL AND FINANCIAL DOCUMENTATION |
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| CRITERION NUMBER | |
| | Legal Standard |
| 2.1 Legal and Financial Status | The program provides a description of the legal status including names of individuals and principal parties with ownership, oversight, and key administrative responsibilities. |
| 28.09(2)(b)(4) | |
| | Rating: Implemented RESPONSE REQUIRED: No |

AREA 3: ADMINISTRATION - MANUALS AND HANDBOOKS

| CRITERION NUMBER | Legal Standard |
|---|---|
| <p>3.1 Policies & Procedures Manual</p> <p>28.09(11)(b)</p> | <p>The private special education school maintains an onsite policies and procedures manual and shall provide written notice to parents of enrolled students that copies of such policies and procedures are available upon request.</p> <p>The program’s manual must contain a Table of Contents and a policy for all subject areas. The policies and procedures must include, but are not limited to:</p> <ul style="list-style-type: none"> • Reporting Suspected Child Abuse/Neglect to DCF and to the Disabled Persons Protection Commission (Criterion 3.1(c)); • Evacuation and Emergency Procedures (3.1(d) ; • Notification of Substantial Changes (Form 1) (Criterion 4.4); • Immediate Notification (Form2) (Criterion 4.5); • Student Admissions (Criterion 5.1); • State and District-Wide Assessments (Criterion 7.3); • Granting of High School Diplomas or Certificates of Attendance (Criterion 7.4); • Program Modifications and Support Services for Limited English Proficient (LEP) students (Criterion 8.4); • IEP Progress Reports (Criterion 8.8); • Less Restrictive Placement (Criterion 8.10); • Transition Planning (Criterion 8.11); • Behavior Management (Criterion 9.1); • Student Separation Resulting From Behavior Management (Criterion 9.1(a)); • Runaway Students (Criterion 9.3); • Physical Restraint (Criterion 9.4); • 3-5 Day Suspensions (Criterion 9.5); • 10+ Day Suspensions (Criterion 9.6); • Terminations (Criterion 9.7); • Supervision of Students (Criterion 11.11); • New Staff Orientation and Annual In-Service Training (Criterion 12.1 and 12.2); • Visiting, Mail and Telephones (Residential Schools only) (Criterion 14.4); • Parent Involvement (Criterion 15.1); • Change of Student’s Legal Status (Criterion 15.4); • Parent Consent and Notification(Criterion 15.5); • Registering Complaints and Grievances – parents, students and employees (Criterion 15.8); • Student Transportation and Transportation Safety (Only where applicable) |

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| CRITERION NUMBER | |
| | Legal Standard |
| Title VI 34 CFR 300.26 | <p>other students.</p> <ul style="list-style-type: none"> • Unless the student's IEP specifies otherwise, the student must receive: <ul style="list-style-type: none"> ○ sheltered content instruction from a trained and qualified teacher; and ○ additional instruction in English as a Second Language by a certified ESL teacher. |
| | Rating: Implemented RESPONSE REQUIRED: No |

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| CRITERION NUMBER | |
| | Legal Standard |
| 8.5 Current IEP & Student Roster 28.09(5)(a) | The program has on file a current IEP for each enrolled Massachusetts student that has been issued by the responsible public school district and consented to and dated by the student's parent(s) (or student, when applicable). |
| | Rating: Implemented RESPONSE REQUIRED: No |

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| CRITERION NUMBER | |
| | Legal Standard |
| 8.8 IEP – Progress Reports 28.07(3); 34 CFR 300.320(a)(3) (i, ii) | <p>Progress Reports and Content</p> <ul style="list-style-type: none"> • Parents receive reports on the student's progress towards reaching the goals set in the IEP at least as often as parents are informed of the progress of students without disabilities; • Progress Report information sent to parents includes written information on the student's progress toward the annual goals in the IEP; and • <u>The program shall send copies of progress reports to the parents and public school.</u> <p>NOTE: IEP must contain a description of:</p> <ul style="list-style-type: none"> • How the child's progress toward meeting the annual goals will be measured; and • When periodic reports on the progress the child is making toward meeting the annual goals (such as through the use of quarterly or other periodic reports, concurrent with the issuance of report cards) will be provided. |
| | Rating: Partially Implemented RESPONSE REQUIRED: Yes |

Department of Elementary and Secondary Education Finding:

While the majority of progress reports meet all required elements, documentation review demonstrated that not all progress reports indicate student progress toward meeting the annual goals and objectives or address specific benchmarks and objectives.

| CRITERION NUMBER | |
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| | Legal Standard |
| 8.10 IEP Less Restrictive Placement 28.09(9)(c) | The program develops and implements a written plan that describes opportunities for enrolled students to gain the capacity to return to a less restrictive educational program. |
| | Rating: Implemented RESPONSE REQUIRED: No |

| CRITERION NUMBER | |
|---|---|
| | Legal Standard |
| 8.11 IEP - Transition Planning 34 CFR 300.320(b); 300.321(b); 300.322(b)(2); 300.324(c) | <p>The program has a written plan that addresses transition planning, working with the responsible school district to discuss each student’s transition needs annually beginning no later than when the student is 15 years old at the IEP Team meetings, and use of the Department’s Transition Planning Form to document its discussion. If appropriate, the Team considers specially designed, measurable goals based on age-appropriate transition assessments related to training, postsecondary education, employment, and, where appropriate, to independent living skills.</p> <p>Students are invited to and encouraged to attend part or all of Team meetings at which transition services are discussed or proposed.</p> |
| | Rating: Implemented RESPONSE REQUIRED: No |

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| CRITERION NUMBER | |
| | Legal Standard |
| | student's termination from the special education school program. With the mutual agreement of the approved special education school and the public school district, termination of enrollment may be delayed for longer than two calendar weeks. |
| | Rating: Implemented RESPONSE REQUIRED: No |

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| AREA 10: EDUCATIONAL STAFFING REQUIREMENTS - RATIOS |
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| CRITERION NUMBER | |
| | Legal Standard |
| 10.1 Staffing for Instructional Groupings 28.06(6)(d); 28.09(7)(e) | <p>The private special education school shall have instructional groupings that do not exceed 1) the approved ESE Student: Licensed Educator Ratio and 2) the approved ESE Student: Licensed Educator and Aide Ratio.</p> <p>Student: Licensed Educator Ratio is defined as the number of licensed special education teachers, licensed regular education teachers or licensed related service providers to the number of students within an instructional group.</p> <p>Student: Licensed Educator and Aide Ratio is defined as the number of licensed special education teachers, licensed regular education teachers or licensed related service providers, and the number of aides (teacher aide, paraprofessional, direct care staff, behaviorist) to the number of students within an instructional group.</p> |
| | Rating: Implemented RESPONSE REQUIRED: No |

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| CRITERION NUMBER | |
| | Legal Standard |
| 10.2 Age Range 28.06(6)(f, g) | <p>The program shall ensure that the ages of the youngest and oldest child in any instructional grouping shall not differ by more than forty-eight months (4 years).</p> <p>Prior to exceeding the forty-eight month timeframe, an Alternate Compliance Waiver (http://www.doe.mass.edu/pqa/sa_nr) must be requested and approved by the Department.</p> |
| | Rating: Implemented RESPONSE REQUIRED: No |

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| CRITERION NUMBER | |
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| Legal Standard | |
| 10.4 Student: Direct Care Worker Ratios (Residential Schools only) 18.03(2) | The private special education school must demonstrate that it is in compliance with the most recently ESE approved student: direct care worker ratio. |
| Rating: Not applicable RESPONSE REQUIRED: No | |

Department of Elementary and Secondary Education Comment:
Bay Cove is a private day school and therefore this criterion does not apply.

AREA 11: EDUCATIONAL STAFFING REQUIREMENTS - PERSONNEL POLICIES

| CRITERION NUMBER | |
|--|---|
| Legal Standard | |
| 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 | <p>The private special education program shall develop and implement a written personnel policies and procedures manual that describes:</p> <ul style="list-style-type: none"> • Criteria and procedures for hiring. This should include the school’s Criminal Offender Record Information (CORI) policy regarding CORI checks on employees, volunteers and transportation providers whose responsibilities bring them into direct and unmonitored contact with students (upon initial hire and every three years thereafter). [NOTE: A private residential school licensed by EEC does not need to conduct independent CORI checks where those checks have been done through EEC]; • Procedures for evaluation of staff; • Procedures for discipline of staff (including suspensions and dismissals); • Procedures for handling staff complaints (See Criterion 15.8); • A plan for using volunteer and/or intern services; and, • Statement of equal employment/educational opportunities in regard to race, color, creed, religion, national origin, sex, sexual orientation and handicap. |

| CRITERION NUMBER | |
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| | Legal Standard |

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