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| **MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**  **Program Quality Assurance Services** |

##### COORDINATED PROGRAM REVIEW

## CORRECTIVE ACTION PLAN

Charter School or District: Dedham

CPR Onsite Year: 2013-2014

Program Area: Special Education

All corrective action must be fully implemented and all noncompliance corrected as soon as possible and no later than one year from the issuance of the Coordinated Program Review Final Report dated 08/23/2014.

**Mandatory One-Year Compliance Date:** **08/23/2015**

**Summary of Required Corrective Action Plans in this Report**

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 7 | Transfer of parental rights at age of majority and student participation and consent at the age of majority | Partially Implemented |
| SE 47 | Procedural requirements applied to students not yet determined to be eligible for special education | Partially Implemented |
| SE 55 | Special education facilities and classrooms | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 23 | Comparability of facilities | Partially Implemented |

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| **Criterion & Topic:**  SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Review of student records and interviews indicate that one year prior to the student reaching age 18, the district does not consistently inform the parent/guardian and the student of the rights that will transfer from the parent/guardian to the student upon the student's 18th birthday. This notice must state that all rights accorded to the parent/guardian under special education law will transfer to the student.  Review of student records and interviews also indicate that when a student has chosen to share decision-making with his or her parent or other willing adult upon turning 18 years of age, the student is not signing the IEP. Only the parent is continuing to sign the student's IEP. | | |
| **Description of Corrective Action:**  The district has mailed (8/27/2014) the "Notice of "Transfer of Parental Rights" to all students who turned 17 during the summer of 2014, and those who will turn 17 between August 2014 and August 31, 2015, as well as all students who have already turned 18 and who have not completed the transfer of decision making/Age of Majority information. The district has a compiled list of all students who received the mailing. Upon a student turning 18, the special education department will notify the student that he/she must come to the office to meet with the director who will explain the process, review the IEP and request that the student sign his/her IEP if he/she agrees to continue receiving special education services. If the student does not agree to continue with an IEP and has shared decision-making, a meeting with the student and parent(s) will be scheduled to discuss the student's wishes. If the student has sole decision-making rights, the district will issue a termination letter explaining that the student is withdrawing from special education. Special education teachers, principals/assistant principals, and directors will have a list of students who have not signed/returned the completed transfer of rights and will continue to discuss this at all IEP meetings. Students 17 years of age or those turning 17 who are entering the district as a new student throughout the school year will receive the "Notice of "Transfer of Parental Rights" and will be monitored as all current students are for compliance with age of majority criteria. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Special Education | | **Expected Date of Completion:**  03/30/2015 |
| **Evidence of Completion of the Corrective Action:**  Copy of "Notice of Transfer of Parental Rights” letter that was mailed to students August 27, 2014 (uploaded). A copy of the list of students to whom the letter was mailed (uploaded). A list of all students who will turn "17" & "18." (uploaded) The Director of Secondary Special Education and the Director of Out-of-District Student Programming will monitor IEP signatures and Transfer of rights documents throughout the school year. | | |
| **Description of Internal Monitoring Procedures:**  Director of Secondary Special Education and the Director of Out-of-District Student Programming will monitor the student list for compliance for signatures on the transfer of rights form and the IEP as students turn 18 years of age. The list of students will be reviewed and revised to add new to the district students. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority | **Corrective Action Plan Status:** Approved  **Status Date**: 10/02/2014 | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By December 12, 2014, provide evidence of training of the directors of secondary special education and out of district student programming on the processes for notifying students of the Transfer of Parental Rights and consent at the age of majority.  By March 11, 2015, provide a report of an internal review of student records for students who have turned 17 and 18, to be conducted after the training to determine compliance; include the number of student records reviewed, the number of records in compliance and for any records not in compliance, determine the root cause(s) of the non-compliance and the district's plan to remedy the non-compliance.  \*Please note when conducting internal monitoring, the district must maintain the  following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). | | |
| **Progress Report Due Date(s):**  12/12/2014  03/11/2015 | | |

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| **Criterion & Topic:**  SE 47 Procedural requirements applied to students not yet determined to be eligible for special education | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Review of documents and interviews indicate that procedures for the discipline of students not yet determined to be eligible for special education are not included in the student codes of conduct. | | |
| **Description of Corrective Action:**  Paragraph language addressing the protection of students' rights under IDEA regarding discipline for students suspected to having a disability will be inserted into the elementary schools handbook, the middle school handbook and the high school handbook. All principals have received suggested language to be added to the student's handbooks. This is to be discussed and decided on at a leadership meeting in September and October 2014. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Special Education  District Civil Rights Coordinator | | **Expected Date of Completion:**  03/30/2015 |
| **Evidence of Completion of the Corrective Action:**  Copy of student handbooks, student handbook on the DPS web page, and addendums which include the full discipline section of the handbook. | | |
| **Description of Internal Monitoring Procedures:**  The Director of Special Education, the District Civil Rights Coordinator and all principals have reviewed the current handbook language and the additional new language that will be added to the handbooks. The Director of Special Education, the District Civil Rights Coordinator and all principals will conduct an annual review of the handbook language and school websites for compliance with student codes of conduct and all regulation requirements to assure that the approved language is maintained in student handbooks. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 47 Procedural requirements applied to students not yet determined to be eligible for special education | **Corrective Action Plan Status:** Approved  **Status Date**: 10/02/2014 | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By December 12, 2014, provide the agenda and meeting attendance for the leadership meeting addressing the information regarding the discipline of students not yet determined eligible. Provide copies of student handbooks for all levels that demonstrate the inclusion of language addressing the protection of students' rights. | | |
| **Progress Report Due Date(s):**  12/12/2014 | | |

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| **Criterion & Topic:**  SE 55 Special education facilities and classrooms | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Onsite observations and interviews indicate that the district's special education facilities and classrooms are not always equal to the average standards of general education facilities and classrooms. At the Riverdale Elementary School, the resource room is shared by a speech therapist and two special education teachers providing pullout services for grades 1-5. The designated classroom is reconfigured by the installation of three small, side by side cubicle spaces anchored in the center of the room housing desks and chairs, white boards, and computers. These instructional spaces are not large enough for some instructional groupings, which can number up to nine students, and cannot be modified for varying group sizes. Excessive auditory distraction results from a variety of activities occurring simultaneously in this small area.  At Dedham Middle School, special education classrooms and therapy spaces are identified by signage labeling special education instructional areas that stigmatize students, such as Adaptive Learning Center, Strategies for Success, Speech, and Resource.  At Dedham High School, counseling and psychological services are provided in a suite of cubicles which are open at the top thereby compromising confidentiality. Observations and interviews indicate that a sound management system to provide white noise and muffle conversation is available, but used infrequently. Two conference rooms are identified for use for confidential conversations, but are not consistently accessed due to scheduling conflicts that limit the availability of the conference room spaces, or when meeting content becomes a confidential matter unexpectedly. The doors to the counseling cubicles are sliding glass doors that face a passageway between the guidance waiting room, guidance cubicles, and the guidance staff break room, which results in auditory and visual distractions as staff and students pass, and further compromises confidentiality. | | |
| **Description of Corrective Action:**  Instructional spaces for individual and small group special education instruction have been relocated at the Riverdale Elementary School to a full-size classroom, making them comparable to the facilities for students in the other buildings. The special education room at Riverdale where special education pull-out small groups is provided is a full size classroom that has been reconfigured using a divider. A maximum of two special education teachers will provide special education small group services in that room at any one time.  At Dedham Middle School, all signage has been removed and has been replaced with teacher names or room numbers only.  At Dedham High School, the Director of Special Education, the Assistant Superintendent (Director of Civil Rights), the Director of Facilities and the Superintendent are continuing to discuss the guidance area and are working towards modifying the guidance area to provide increased confidentiality. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Special Education  Assistant Superintendent/District Civil Rights Coordinator | | **Expected Date of Completion:**  06/30/2015 |
| **Evidence of Completion of the Corrective Action:**  Riverdale School floor plan, teacher schedules depicting where instruction is taking place (uploaded), DESE site visit | | |
| **Description of Internal Monitoring Procedures:**  Director of Special Education, Assistant Superintendent, and all principals will complete site visits at regular intervals during the school year and monitor compliance with facilities and classrooms to ensure that the appropriate teaching/learning spaces are consistently utilized. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 55 Special education facilities and classrooms | **Corrective Action Plan Status:** Approved  **Status Date**: 10/02/2014 | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  The district submitted floor plans for the Riverdale Elementary School with the proposed corrective action plan. Room assignments and reconfigurations were identified. Schedules for two special education teachers were also provided to document usage of the special education classroom.  By December 12, 2014, the Department will conduct site visits to the Riverdale Elementary School and Dedham Middle School to review completion of corrective actions. Also by December 12, 2014, submit the proposal for correcting the structural issues that impact confidentiality in the guidance area of Dedham High School.  By March 11, 2015, the Department will conduct a site visit to Dedham High School. | | |
| **Progress Report Due Date(s):**  12/12/2014  03/11/2015 | | |

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| **Criterion & Topic:**  CR 10A Student handbooks and codes of conduct | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  See SE 47. | | |
| **Description of Corrective Action:**  Paragraph language addressing the protection of students' rights under IDEA regarding discipline for students suspected to having a disability will be inserted into the elementary schools handbook, the middle school handbook and the high school handbook. All principals have received suggested language to be added to the student's handbooks. This is to be discussed and decided on at a leadership meeting in September and October 2014. | | |
| **Title/Role(s) of Responsible Persons:**  Assistant Superintendent/District Civil Rights Coordinator | | **Expected Date of Completion:**  03/30/2015 |
| **Evidence of Completion of the Corrective Action:**  Copy of student handbooks, student handbook on the DPS web page, and addendums which include the full discipline section of the handbook. | | |
| **Description of Internal Monitoring Procedures:**  The Director of Special Education, the District Civil Rights Coordinator and all principals have reviewed the current handbook language and the additional new language that will be added to the handbooks. The Director of Special Education, the District Civil Rights Coordinator and all principals will conduct an annual review of the handbook language and school websites for compliance with student codes of conduct and all regulation requirements to assure that the approved language is maintained in student handbooks. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Approved  **Status Date**: 10/02/2014 | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  See SE 47. | | |
| **Progress Report Due Date(s):**  12/12/2014 | | |

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| **Criterion & Topic:**  CR 23 Comparability of facilities | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Onsite observations at the Greenlodge Elementary School and the Riverdale Elementary School indicate that instructional spaces for individual and small group English language development instruction (ESL) are not comparable to the facilities for other students. Instruction takes place in hallways or on the open stage area which is also a corridor where students continuously pass through, creating visual and auditory distractions.    See also SE 55. | | |
| **Description of Corrective Action:**  Instructional spaces for individual and small group English language development instruction have been relocated at the Riverdale and Greenlodge Elementary Schools, making them comparable to the facilities for ESL students in the other buildings. Hallways and open areas are no longer utilized in either building. | | |
| **Title/Role(s) of Responsible Persons:**  Assistant Superintendent for Curriculum, Instruction and Assessment | | **Expected Date of Completion:**  06/30/2015 |
| **Evidence of Completion of the Corrective Action:**  Riverdale and Greenlodge School floorplans with appropriate ESL instructional areas identified are attached. The Riverdale space is used solely by the ELL teacher. At Greenlodge a full size classroom is used by a special education teacher in the morning when the ELL teacher is located at the Oakdale School. The ELL teacher uses the space in the afternoon when the special educator is located at the Avery School. At designated times the space may also shared with a Greenlodge reading specialist | | |
| **Description of Internal Monitoring Procedures:**  Site visits will be conducted at regular intervals by the Assistant Superintendent and principals to ensure that the appropriate teaching/learning spaces are consistently utilized. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 23 Comparability of facilities | **Corrective Action Plan Status:** Approved  **Status Date**: 10/01/2014 | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  The district submitted floor plans along with the corrective action plan for the Riverdale Elementary School and the Greenlodge Elementary School designating the instructional areas for ELL instruction.    By December 12, 2014, the Department will conduct on-site visits at the Riverdale Elementary School and the Greenlodge Elementary School to confirm the corrective actions taken by the district to provide comparable instructional facilities for ESL instruction. | | |
| **Progress Report Due Date(s):**  12/12/2014 | | |