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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: Brockton

CPR Onsite Year: 2015-2016

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 01/15/2016.

**Mandatory One-Year Compliance Date:** **01/15/2017**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 2 | Required and optional assessments | Partially Implemented |
| SE 21 | School day and school year requirements | Partially Implemented |
| SE 29 | Communications are in English and primary language of home | Partially Implemented |
| SE 48 | Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education | Partially Implemented |
| SE 55 | Special education facilities and classrooms | Partially Implemented |
| SE 56 | Special education programs and services are evaluated | Not Implemented |
| CR 3 | Access to a full range of education programs | Partially Implemented |
| CR 7B | Structured learning time | Partially Implemented |
| CR 8 | Accessibility of extracurricular activities | Partially Implemented |
| CR 9 | Hiring and employment practices of prospective employers of students | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 10B | Bullying Intervention and Prevention | Partially Implemented |
| CR 10C | Student Discipline | Partially Implemented |
| CR 16 | Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | Partially Implemented |
| CR 17A | Use of physical restraint on any student enrolled in a publicly-funded education program | Implementation In Progress |
| CR 21 | Staff training regarding civil rights responsibilities | Partially Implemented |
| CR 22 | Accessibility of district programs and services for students with disabilities | Partially Implemented |
| CR 23 | Comparability of facilities | Partially Implemented |
| CR 25 | Institutional self-evaluation | Not Implemented |

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| **Criterion & Topic:** SE 2 Required and optional assessments | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Student record review indicated that when the district is conducting an initial evaluation or re-evaluation, it does not consistently complete the following required assessments:A) Educational assessment by a representative of the school district, including a history of the student's educational progress in the general curriculum; andB) Assessment by a teacher with current knowledge regarding the student's specific abilities in relation to learning standards of the Massachusetts Curriculum Frameworks and the district's general education curriculum, as well as an assessment of the student's attention skills, participation behaviors, communication skills, memory, and social relations with groups, peers, and adults. |
| **Description of Corrective Action:** The district has determined that the use of the educational assessment previously approved by DESE does not meet the requirements outlined in the SE findings. As of 11/2/2015, all previously used forms have been discarded and use of the DESE educational assessment form has been implemented. Training of all special education teachers on the use of the form was completed on 11/9/2015. The special education teachers working in each building reviewed the form with the general education teacher. The Assistant Director will regularly monitor the use of the educational assessment form for students undergoing an evaluation. |
| **Title/Role(s) of Responsible Persons:**Laurie Mason, Director of Special EducationOlga Garriga, Assistant Director of Special Education | **Expected Date of Completion:**09/01/2016 |
| **Evidence of Completion of the Corrective Action:**Principals will be informed and trained on the proper use of the new educational assessment form. They will be asked to review these requirements at building based staff meetings. |
| **Description of Internal Monitoring Procedures:** Randomly review 30 initial/reevaluation files containing educational assessments for use of proper form(Preschool -12) |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 2 Required and optional assessments | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit evidence of staff training on the requirements for completing Educational Assessments A and B. Include the training dates, agenda, training materials, and signed attendance sheets indicating the title/role of staff and the name and title of the presenter. By June 15, 2016, for those student records identified by the Department, complete the missing educational assessments and reconvene the IEP Teams to review the results of the assessments and to update the IEPs, as appropriate. Submit copies of the completed educational assessments, as well as copies of the Team Meeting Invitation (N3) and Team Meeting Attendance Sheet (N3A) as evidence that IEP Teams reconvened to review the assessment results.By September 30, 2016, submit a report of the results of an internal review of 30 student records across all schools/levels, conducted following the staff training, to ensure consistency and continued compliance for completion of Educational Assessments A and B. Include the number of student records reviewed, the number of records in compliance, and for any records not in compliance, determine the root cause of the non-compliance and the district's plan to remedy the non-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 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):** 06/15/201609/30/2016 |

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| **Criterion & Topic:** SE 21 School day and school year requirements | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Interviews indicated that specialized transportation oftentimes impedes student access to a full school day and program of instruction. Due to transportation schedules, students with specialized transportation at the elementary schools often arrive after the day has started while some students using specialized transportation at the high school are ending their day 20 minutes early to get on the vans. |
| **Description of Corrective Action:** The district has determined that the root cause for issues with transportation was the reduction of special education vans due to budget cuts. The district is reviewing routes and will determine how many additional vans are needed to ensure students arrive and depart from school on a timely manner. The budget will include the additional vans needed to support routes mapped. |
| **Title/Role(s) of Responsible Persons:**Laurie Mason, Director of Special EducationMichael Thomas, Deputy Superintendent | **Expected Date of Completion:**09/01/2016 |
| **Evidence of Completion of the Corrective Action:**Laurie Mason and Michael Thomas will meet with the district transportation specialist during the month of August to review routes and ensure sufficient vans have been allocated to special education students. |
| **Description of Internal Monitoring Procedures:** GPS data will be reviewed to ensure vans arrive at the elementary schools on time for the beginning of the school day and leave BHS at the end of the school day. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 21 School day and school year requirements | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit the district's process to ensure specialized transportation does not impede student access to a full school day and program of instruction. Include date for meeting between Special Education Director, Deputy Superintendent and District Transportation Specialist to review transportation schedules. Include any initial analysis of transportation schedules and plans to correct non-compliance. Include the name(s)/role(s) of the person(s) responsible for oversight to ensure specialized transportation schedules do not impede a student's access to a full school day and program of instruction.By September 30, 2016, review all transportation schedules for students with specialized transportation at the elementary schools and at Brockton High School to ensure student access to a full school day and program of instruction. Provide a detailed narrative summary of this internal review, including a list of schools reviewed, data collected and analysis of district data. If non-compliance is identified, report the specific actions taken to correct the transportation schedule(s), identify and report the root cause(s) of the ongoing non-compliance and a plan to remedy it. |
| **Progress Report Due Date(s):** 06/15/201609/30/2016 |

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| **Criterion & Topic:** SE 29 Communications are in English and primary language of home | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Student record review indicated that communications are not always in English and the primary language of the home, if such primary language is other than English. Specifically, the district does not consistently translate IEPs for parents whose primary language of the home is not English. |
| **Description of Corrective Action:** The district has determined that the root cause for issues with translations stemmed from inconsistent processing of student's IEPs needing translation. A training has been scheduled with TEAM Chairpersons and Administrative Assistants on February 5, 2016 to review the process for translating IEP's and other documents. Currently used checklist will be amended to highlight student records requiring translations. |
| **Title/Role(s) of Responsible Persons:**Olga Garriga, Assistant Director of Special Education Nadeen Sullivan, Translations | **Expected Date of Completion:**06/01/2016 |
| **Evidence of Completion of the Corrective Action:**Training session , attendance sheet and Revised checklist |
| **Description of Internal Monitoring Procedures:** Monthly cross referencing of student files determined to require translation with translation data base. Randomly review 30 files requiring translations for proper implementation of new procedure. (Preschool -12) |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 29 Communications are in English and primary language of home | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit evidence of the Team chairperson and Administrative Assistant training, including the agenda, training materials, training date, sign-in sheets indicating the title/role of staff, and the name/title of the presenter. By September 30, 2016, submit a report of the results of an internal review of records in which IEPs were developed subsequent to implementation of all corrective actions. Include the number of student records reviewed, the number of records in compliance, and for any records not in compliance, determine the root cause 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):** 06/15/201609/30/2016 |

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| **Criterion & Topic:** SE 48 Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Interviews indicated that students at the Goddard Alternative School, a public day program serving students with special needs in grades 5 -12, do not have access to art and music as these classes are not offered at this school. Due to scheduling issues, students in the substantially separate programs at Brockton Champion High School do not have access to art. |
| **Description of Corrective Action:** 1. The public day program serving students with special needs in grades 5 -12, do not have access to art and music as these classes are not offered at this school. The 2016-2017 district budget will reflect an art and music teacher assigned to the Goddard school to provide these classes. 2. The district has determined that the root cause for the Champion High School substantially separate programs not having access to art due to scheduling conflicts. Schedules have been altered to ensure all students receive art. |
| **Title/Role(s) of Responsible Persons:**Elizabeth Barry, Deputy SuperintendentLaurie Mason, Director of Special Education | **Expected Date of Completion:**09/01/2016 |
| **Evidence of Completion of the Corrective Action:**1. Schedules will reflect art and music classes for students grades 5-12. 2. Modified schedules |
| **Description of Internal Monitoring Procedures:** Review of student schedules prior to the start of the school year. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 48 Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit schedules for students in substantially separate programs at Champion High School documenting access to art classes. Also submit schedules for students at Goddard Alternative School documenting student access to art and music classes. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| **Criterion & Topic:** SE 55 Special education facilities and classrooms | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Observations and staff interviews indicated that the location of rooms used for the provision of special education services at several schools does not always allow for the confidentiality of students receiving such services, and does not always maximize the inclusion of such students into the life of the school. Specifically, observations indicated that students receiving therapeutic counseling services in small offices at the Goddard Alternative School must pass through classrooms where students are being taught, which creates distractions and precludes student privacy. Observations at West Middle School indicated that special education students accessing an instructional space for pull-out support services must pass through a general education classroom while it is in session, which creates distractions and precludes student privacy. Observations at Plouffe Academy Middle School indicated that the auditory teacher's office, where special education support services are provided, is accessible only by walking through a computer lab where instruction may be occurring, which creates distractions and precludes student privacy. Observations at the Downey Elementary School indicated that the substantially separate special education programs are located at the end of a hallway without regular education classrooms in the vicinity and are not fully integrated into the life of the school. |
| **Description of Corrective Action:** 1. The district has determined that building principals at West Middle School, Plouffe and Goddard School assigned teaching spaces based on their buildings configuration , size of available space and location. The identified spaces will be moved to other locations that do not interfere with instruction and ensure student privacy. 2. The Downey Elementary School is a pod school where general education classrooms and inclusion classrooms receive instruction in an open space format(no walls). Substantially separate classrooms are the only walled classrooms. These classrooms require a quieter more contained space. In addition, three classes were located near the nurses offices due to the special education students medical needs. These students are integrated into the life of the school throughout the day in periods such as lunch, recess, assemblies, and special events. After a thorough analysis, the district has determined that moving these classrooms will be detrimental to the special education students. |
| **Title/Role(s) of Responsible Persons:**Laurie Mason, Director of Special Education and BPS Executive Team | **Expected Date of Completion:**09/01/2016 |
| **Evidence of Completion of the Corrective Action:**Maps of school identifying new spaces |
| **Description of Internal Monitoring Procedures:** Walkthrough of buildings to assess teaching spaces. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 55 Special education facilities and classrooms | **Corrective Action Plan Status:** Partially Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:** The district submitted a description of corrective action to relocate identified classroom spaces at Goddard Alternative School, West Middle School and Plouffe Academy Middle School. The district stated that moving classrooms at Downey Elementary School will be detrimental to the special education students. However, at Downey Elementary School, Classrooms C007 and C008 are located at the end of a hallway without regular education classrooms in the vicinity and are not fully integrated into the life of the school. |
| **Department Order of Corrective Action:**Relocate identified classrooms at Downey Elementary School used for substantially separate special education programs to ensure full integration into the life of the school. |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit the plan to relocate identified classrooms at Goddard Alternative School, West Middle School, Plouffe Academy Middle School and Downey Elementary School to more appropriate spaces for the start of the 2016-17 school year, including floor plans/maps for each school showing current location of each classroom and proposed new location for each classroom. Submit letters of assurance from the Superintendent and school principals of these schools acknowledging classroom location plans to ensure compliance.By September 30, 2016, the Department will conduct onsite verification at Goddard Alternative School, West Middle School, Plouffe Academy Middle School and Downey Elementary School of relocated rooms used for the provision of special education services. |
| **Progress Report Due Date(s):** 06/15/201609/30/2016 |

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| **Criterion & Topic:** SE 56 Special education programs and services are evaluated | **CPR Rating:** Not Implemented |
| **Department CPR Findings:** Document review and interviews confirmed that special education programs and services are not regularly evaluated. |
| **Description of Corrective Action:** The special education programs and services were not regularly evaluated. The district has contracted an outside provider to complete a comprehensive evaluation of all programs and services. The evaluation will be completed in phases over the next three years. Phase One will focus on Alternative Schools and BHS. Phase Two will focus on Middle schools and Phase Three will focus on preschool and Elementary programs and services. |
| **Title/Role(s) of Responsible Persons:**Laurie Mason, Director of Special EducationOlga Garriga, Assistant Director of Special Education | **Expected Date of Completion:**12/30/2016 |
| **Evidence of Completion of the Corrective Action:**Action Plan developed by evaluator in consultation with Director and Assistant Director of Special EducationCompletion of Program Evaluation Implementation of recommendations |
| **Description of Internal Monitoring Procedures:** Meeting Agendas with ConsultantPeriodic review of data gathered throughout the evaluation process |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 56 Special education programs and services are evaluated | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit the district action plan for evaluation of special education programs and services, including timelines. In addition, please submit meeting agendas with consultant.By December 15, 2016 submit any completed evaluation(s) and/or meeting minutes documenting review of data gathered through the evaluation process. In addition, submit results of evaluation(s) with goals/benchmarks/outcomes. |
| **Progress Report Due Date(s):** 06/15/201612/15/2016 |

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| **Criterion & Topic:** CR 3 Access to a full range of education programs | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that although the school committee policy describes how it ensures equal access to a full range of education programs for all students, regardless of race, color, sex, religion, national origin, sexual orientation, or disability, the description does not address the protected categories of gender identity or homelessness. |
| **Description of Corrective Action:** The district has determined that a root cause for this finding is a systemic weakness in the review and revision of policy. Consequently, the district will engage the Massachusetts Association of School Committees [MASC] service for policy review and development. The Superintendent and Executive Team of the Brockton Public Schools [BPS] will meet with a representative of MASC on February 2, 2016 to discuss policy needs. BPS will begin by updating and amending the Civil Rights policies identified as findings in the CPR. Specific to this criterion school committee policies JB-R [Equal Educational Opportunities]; JC/JCA [Attendance Areas and School Assignments]; and JF-E [School Admissions] will be amended to include the protected categories of gender identity and homelessness. |
| **Title/Role(s) of Responsible Persons:**Executive Director of Pupil Personnel and BPS Executive Team | **Expected Date of Completion:**09/30/2016 |
| **Evidence of Completion of the Corrective Action:**Revised policies, including date of revision and school committee approval |
| **Description of Internal Monitoring Procedures:** Executive Team will oversee progress by discussing at regularly scheduled meetings. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 3 Access to a full range of education programs | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit a copy of each district policy noted in the description of corrective action that ensures equal access to a full range of education programs for all students, regardless of race, color, sex, religion, national origin, sexual orientation, or disability, including the protected categories of gender identity or homelessness, along with evidence of notification of the revised policy to the school community. Also submit the means of dissemination to the school community of the revised policies. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| **Criterion & Topic:** CR 7B Structured learning time | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and interviews indicated that physical education is not a required subject for all four years at Brockton High School. Specifically, while physical education is required in grades 9, 11 and 12, it is not a required subject in grade 10. |
| **Description of Corrective Action:** Brockton High School will revise its Course of Study document to include a physical education/wellness requirement for grade 10. Guidance counselors will be directed to include physical education requirement as part of grade 10 student schedule. |
| **Title/Role(s) of Responsible Persons:**BHS Principal; Director of Physical Education; BHS Guidance Dept. Head | **Expected Date of Completion:**06/30/2016 |
| **Evidence of Completion of the Corrective Action:**Revised course of study document and grade 10 student schedules |
| **Description of Internal Monitoring Procedures:** Internal review of student schedules by Director of Physical Education and BHS Guidance Dept. Head |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 7B Structured learning time | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit a copy of the Course of Studies document indicating the provision of physical education for four years along with an updated Superintendent's Student Learning Time Worksheet pp 36-37 in CPR Civil Rights Materials. In addition, submit copies of training with the Guidance Department, ensuring training on the requirement that high school students receive four years of physical education, e.g. agenda with date of training, training materials, and signed attendance sheets. By September 30, 2016, submit a copy of sample schedules for grade 10 students demonstrating that students are enrolled in physical education classes. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| **Criterion & Topic:** CR 8 Accessibility of extracurricular activities | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that the school committee policy regarding the accessibility of extracurricular activities does not address the protected categories of gender identity or homelessness. |
| **Description of Corrective Action:** The district has determined that a root cause for this finding is a systemic weakness in the review and revision of policy. Consequently, the district will engage the Massachusetts Association of School Committees [MASC] service for policy review and development. The Superintendent and Executive Team of the Brockton Public Schools [BPS] will meet with a representative of MASC on February 2, 2016 to discuss policy needs. BPS will begin by updating and amending the Civil Rights policies identified as findings in the CPR. Specific to this criterion school committee policies JJ-E [Co-Curricular and Extracurricular Activities]; JJIBA [Athletic Department Philosophy]; JJIC [Athletic Eligibility]; JJIB [Interscholastic Athletics]; and JJJ [Academic Requirements for Athletics and Extracurricular Activities will be amended to include the protected categories of gender identity and homelessness. |
| **Title/Role(s) of Responsible Persons:**Executive Director of Pupil Personnel and BPS Executive Team | **Expected Date of Completion:**09/30/2016 |
| **Evidence of Completion of the Corrective Action:**Revised policies, including date of revision and school committee approval |
| **Description of Internal Monitoring Procedures:** Executive Team will oversee progress by discussing at regularly scheduled meetings. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 8 Accessibility of extracurricular activities | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit a copy of each district policy noted in the description of corrective action stating extracurricular activities or clubs sponsored by the school do not exclude students on the basis of race, sex, gender identity, color, religion, national origin, sexual orientation, disability, or homelessness and evidence of dissemination to all staff, along with evidence of notification of the revised policies to the school community. Also submit evidence of the means of dissemination to the school community. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| **Criterion & Topic:** CR 9 Hiring and employment practices of prospective employers of students | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and interviews indicated that the co-operative education course agreement, signed by a prospective employer, does not indicate that the employer does not discriminate in hiring or employment practices on the basis of gender identity. |
| **Description of Corrective Action:** The district will modify its Cooperative Education Course Agreement to include the protected category of gender identity in the non-discrimination assurance statement signed by the prospective employer. |
| **Title/Role(s) of Responsible Persons:**Director of Voc Tech EdBHS PrincipalExecutive Director of Pupil Personnel | **Expected Date of Completion:**06/30/2016 |
| **Evidence of Completion of the Corrective Action:**Revised Cooperative Education Course Agreement |
| **Description of Internal Monitoring Procedures:** Periodic check-in with Director of Business, Technology, and Career Education |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 9 Hiring and employment practices of prospective employers of students | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit a copy of the updated Cooperative Education Course Agreement that includes gender identity in the non-discrimination statement signed by the prospective employer and evidence of dissemination to relevant staff. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| **Criterion & Topic:** CR 10A Student handbooks and codes of conduct | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that the codes of conduct, as set forth in the student handbooks, do not contain procedures for the discipline of students with Section 504 Accommodation Plans. See CR 10C. |
| **Description of Corrective Action:** BPS handbooks are revised during the spring of each school year. During the spring of 2016, all handbooks will be revised to include in the Code of Conduct procedures for the discipline of students with Section 504 Accommodation Plans. |
| **Title/Role(s) of Responsible Persons:**Dep. Supt. [Chair of Handbook Revision Committee]Director of Communications504 Coordinator | **Expected Date of Completion:**06/30/2016 |
| **Evidence of Completion of the Corrective Action:**Revised Handbooks for School Year 2016-17 |
| **Description of Internal Monitoring Procedures:** Handbook Revision Committee meetings during the spring, 2016 |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit copies of the section of the Code of Conduct, as set forth in 2016-2017 student handbooks at all district schools, that contain procedures for the discipline of students with Section 504 Accommodation Plans. See also CR 10C. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| **Criterion & Topic:** CR 10B Bullying Intervention and Prevention | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and interviews indicated that the district's Bullying Prevention and Intervention Plan, as referenced in student handbooks, has not been amended to extend protections to students who are bullied by a member of the school staff. The student handbook for Edison Academy does include the definition of a perpetrator that includes a member of the staff, but the definition of bullying does not include a member of the staff. In addition, document review and interviews confirmed that the district does not implement for all school staff, including special education teachers, general education teachers, paraprofessionals, and related service providers, professional development that includes developmentally appropriate strategies to prevent bullying incidents; developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents; information regarding the complex interaction and power differential that can take place between and among a perpetrator, victim and witnesses to the bullying; research findings on bullying, including information about specific categories of students who have been shown to be particularly at risk for bullying in the school environment; information on the incidence and nature of cyber-bullying; and internet safety issues as they relate to cyber-bullying. |
| **Description of Corrective Action:** First, as part of its partnership with MASC, the district will revise its policy on bullying to include in both the definition of bullying, as well as in the definition of perpetrator, “bullying by staff” as required by the amended M.G.L. c.71, sec. 370. Second, the district will also amend its Bullying Prevention and Intervention Plan to extend its protection to students who are bullied by staff. Third, the above information will also be reflected in the definition of bullying provided in the revised student handbooks for SY 2016-17.Fourth, the district will provide for all school staff professional development that includes developmentally appropriate strategies to prevent bullying incidents; developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents; information regarding the complex interaction and power differential that can take place between and among a perpetrator, victim, and witnesses to the bullying; research findings on bullying, including information about specific categories of students who have been shown to be particularly at risk for bullying in the school environment; information on the incidence and nature of cyber-bullying; and internet safety issues as they relate to cyber-bullying. |
| **Title/Role(s) of Responsible Persons:**Dep. Supt.; Exec. Dir. of Pupil Personnel & members of the Exec. Team; Director of Wellness preK-12 | **Expected Date of Completion:**10/31/2016 |
| **Evidence of Completion of the Corrective Action:**Revised School Committee Policy on Bullying; Revised Bullying Prevention and Intervention Plan; Student Handbooks SY 2016-17; Documentation of professional development [powerpoint, agenda, attendance sheets] |
| **Description of Internal Monitoring Procedures:** Use Executive Team meetings to progress monitor policy revisions, handbook revisions, and the provision of professional development training. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10B Bullying Intervention and Prevention | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit the district's amended Bullying Prevention and Intervention Plan extending protections to students who are bullied by a member of the school staff.By September 30, 2016, submit copies of relevant sections of 2016-17 student handbooks documenting the district's amended Bullying Prevention and Intervention Plan, extending protections to students who are bullied by a member of the school staff. By September 30, 2016, submit evidence of professional development training on the district's Bullying Prevention and Intervention Plan for all staff that includes developmentally appropriate strategies to prevent bullying incidents; developmentally appropriate strategies for immediate, effective interventions to stop bullying incidents; information regarding the complex interaction and power differential that can take place between and among a perpetrator, victim and witnesses to the bullying; research findings on bullying, including information about specific categories of students who have been shown to be particularly at risk for bullying in the school environment; information on the incidence and nature of cyber-bullying; and internet safety issues as they relate to cyber-bullying. Include a detailed agenda, specific training topics and materials, training dates, signed attendance sheets indicating the title/role of staff and which school they are from, and the name and title of the presenter. |
| **Progress Report Due Date(s):** 06/15/201609/30/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 10C Student Discipline | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and interviews indicated that while the school committee has established student discipline policies and procedures, the policies and procedures are not consistent with the changes to M.G.L. c. 71, section 37H ¾, including:1. Procedures for emergency removal;2. Procedures for principal hearings for both short and long-term suspension;3. Procedures for in-school suspension;4. Procedures for superintendent hearing;5. A system for periodic review of discipline data by special populations; and6. Alternatives to suspension. |
| **Description of Corrective Action:** As part of its partnership with MASC, the district will revise its student discipline policies and procedures to be consistent with the provisions of M.G.L. c.71, sec. 37H ¾. |
| **Title/Role(s) of Responsible Persons:**Executive Director of Pupil Personnel and Executive Team | **Expected Date of Completion:**10/31/2016 |
| **Evidence of Completion of the Corrective Action:**Revised policy & procedure documents that incorporate the provisions of section 37H ¾, as detailed above. |
| **Description of Internal Monitoring Procedures:** Use of weekly Executive Team meetings to monitor progress. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10C Student Discipline | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit revised student discipline policies and procedures consistent with the changes to M.G.L. c. 71, section 37H ¾, including: 1. Procedures for emergency removal; 2. Procedures for principal hearings for both short and long-term suspension; 3. Procedures for in-school suspension; 4. Procedures for superintendent hearing; 5. A system for periodic review of discipline data by special populations; and 6. Alternatives to suspension. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 16 Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that the letter issued with regard to a student who is 16 years of age or older leaving school without a high school diploma, certificate of attainment or certificate of completion is sent within five days following the student's fifteenth consecutive absence and not after the student's tenth consecutive absence, as required. The notice does not offer at least two dates and times for an exit interview between the superintendent or designee and the student and parent/guardian to occur prior to the student permanently leaving school. The notice does not contain information that the time and the date for the exit interview may be extended at the request of the parent/guardian for no longer than 14 days. |
| **Description of Corrective Action:** The district will revise the letter to include an offer of two specific dates/times for an exit interview with student & parent/guardian; the revised letter will also specify that the time and date for the exit interview may be extended at the request of the parent/guardian for no longer than 14 days. Moreover, the district will send the letter within 5 days of a student’s tenth consecutive absence, as required. Finally, a monitoring system [e.g., spreadsheet] will be employed to document that the letter is sent within 5 days of the student’s tenth consecutive absence. |
| **Title/Role(s) of Responsible Persons:**Executive Director of Pupil Personnel; BHS Principal; Dept. Head for Guidance 9-12. | **Expected Date of Completion:**06/30/2016 |
| **Evidence of Completion of the Corrective Action:**Revised letter and monitoring system [e.g., spreadsheet] |
| **Description of Internal Monitoring Procedures:** Internal review [meetings with Principal and Dept. Head] |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 16 Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit a copy of the district's revised letter sent to parents of students 16 years of age or older within ten days from a student's fifteenth consecutive unexcused absence along with evidence of training for relevant staff to include copies of agendas, materials and signed attendance sheets.By June 15, 2016, submit a list of students 16 years of age or older with fifteen or more consecutive unexcused absences, along with copies of the notice sent to the students and their parents.By September 30, 2016, submit the results of an administrative review of the monitoring system to ensure timeline requirements are being met. Indicate how many letters were issued within five days following the student's tenth consecutive absence. For any continued non-compliance, identify the root cause and provide a description of additional corrective actions to be taken by the district to address identified non-compliance. |
| **Progress Report Due Date(s):** 06/15/201609/30/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 17A Use of physical restraint on any student enrolled in a publicly-funded education program | **CPR Rating:** Implementation In Progress |
| **Department CPR Findings:** Document review and interviews indicated that while the topic of physical restraint is on the agenda of each school's first all-staff meeting in September, staff are directed to a specific website and are asked to review the Brockton Public Schools' physical restraint and behavior support policies and requirements. The district does not have a means of verifying which staff members actually reviewed this information on-line within the first month of the school year, except for at South Middle School where staffs are required to sign and date a sheet indicating review of the district's physical restraint and behavior support policies and requirements. Interviews indicated that the district is currently in the process of revising its written restraint prevention and behavior support policy and procedures and has plans to conduct training for all staff, including in-depth training for designated staff, in advance of the new requirements going into effect on January 1, 2016. |
| **Description of Corrective Action:** The district will adopt, at all schools, the practice employed by South Middle School requiring the signature of staff to indicate review of mandated documents. Moreover, the district has already provided training regarding the new physical restraint requirements to administrators [see attached powerpoint, agenda, and attendance documentation]; and will be providing training to all staff [see attached powerpoint]. The district also will provide in-depth restraint training [a 3 hour refresher for previously trained staff, scheduled for February 22, and a16 hour training for non-previously trained staff, scheduled for March 14- April 4, 2016. Finally, the district will revise its policy JKAA [Physical Restraint] to comply with the requirements of 603 CMR 46.00 |
| **Title/Role(s) of Responsible Persons:**Exec. Director Pupil Personnel and Exec. Team;Dept. Head Guidance; Dept. Head Therapeutic Support | **Expected Date of Completion:**06/30/2016 |
| **Evidence of Completion of the Corrective Action:**Revised policy; training agendas & signature/attendance sheets; powerpoint training materials |
| **Description of Internal Monitoring Procedures:** Discussion/progress monitoring at weekly Executive Team meeting |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 17A Use of physical restraint on any student enrolled in a publicly-funded education program | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit the revised and approved written restraint prevention and behavior support policy and procedures (JKAA (Physical Restraint)). By September 30, 2016, submit sign-in sheets or other methods used to verify staff members have reviewed the Brockton Public Schools' physical restraint and behavior support policies and procedures requirements on-line within the first month of the school year. |
| **Progress Report Due Date(s):** 06/15/201609/30/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 21 Staff training regarding civil rights responsibilities | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and interviews indicated that while the topic of civil rights responsibilities is on the agenda of each school's first all-staff meeting in September, staffs are directed to a specific website to review the district's civil rights responsibilities and policies. The district does not have a means of verifying which staff members actually reviewed this information on-line, except for at South Middle School where staff are required to sign and date a sheet indicating review of district policies and resources that include civil rights responsibilities. |
| **Description of Corrective Action:** The district will adopt at all schools the practice employed at South Middle School. Staff will be required to sign and date a sheet indicating review of district policies and resources that pertain to civil rights responsibilities. |
| **Title/Role(s) of Responsible Persons:**Executive Director of Pupil Personnel;All Building Principals | **Expected Date of Completion:**09/30/2016 |
| **Evidence of Completion of the Corrective Action:**A verification sheet with staff signatures & dates verifying review of district policies/resources. |
| **Description of Internal Monitoring Procedures:** Discussion of new system at preK-12 Principal meeting. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 21 Staff training regarding civil rights responsibilities | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit evidence that all school personnel receive at least annually, in-service training regarding civil rights responsibilities. Include verification sheets with staff signatures and dates indicating review of district policies and resources that include civil rights responsibilities. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 22 Accessibility of district programs and services for students with disabilities | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Observations and interviews indicated that the Goddard Alternative School, an approved public day program serving students in grades 5-12, is not entirely accessible as the building has three levels and does not have an elevator. As a result, mobility-impaired students are unable to access the cafeteria and workout space on the basement floor or the second floor classrooms. |
| **Description of Corrective Action:** The district currently does not have any mobility-impaired students who require placement at the Goddard School. However, as a response to this finding, the district will develop a plan that it would implement should the need arise. |
| **Title/Role(s) of Responsible Persons:**Dep. Supt. of Oper; Dep. Supt. of T & L; Exec. Dir. of Pupil Personnel; Dir. of SPED; Prin. Goddard | **Expected Date of Completion:**10/31/2016 |
| **Evidence of Completion of the Corrective Action:**Completed Contingency Plan |
| **Description of Internal Monitoring Procedures:** Planning meetings involving Deputy Superintendent, Executive Director of Pupil Personnel, Director of Special Education, Principal Goddard School, and BPS legal counsel |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 22 Accessibility of district programs and services for students with disabilities | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 30, 2016, submit the contingency plan allowing for all educational programs and services offered at Goddard Alternative School to be entirely accessible to students with disabilities. |
| **Progress Report Due Date(s):** 09/30/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 23 Comparability of facilities | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Observations of instructional spaces indicated that at the Brookfield Elementary School, English language development instruction takes place in a sectioned-off corner of a former gymnasium with dividers open at the top. Art instruction for all students occurs concurrently in this space, resulting in auditory distractions. At the Davis K-8 School, the classroom (Room N0001) used for English language development instruction is not comparable to the space provided to the overall student population. The room used is a small space that may be adequate for small group instruction; however, at the time of the observation, there were 18 students with one teacher leading to over-crowding. |
| **Description of Corrective Action:** See response to ELE#16: The district will relocate each classroom to more appropriate space for the start of the 2016-17 school year. |
| **Title/Role(s) of Responsible Persons:**Executive Director of Pupil PersonnelDirector of Bilingual EducationExecutive Team Members | **Expected Date of Completion:**09/01/2016 |
| **Evidence of Completion of the Corrective Action:**School map/floor-plan indicating new location. |
| **Description of Internal Monitoring Procedures:** Planning meetings between Director of Bilingual Education and Executive Team |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 23 Comparability of facilities | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2016, submit the plan to relocate identified classrooms at Brookfield Elementary School and Davis K-8 School to more appropriate spaces for the start of the 2016-17 school year including floor plans/maps for each school showing current location of each classroom and proposed new location for each classroom. Submit letters of assurance from the Superintendent and school principals of identified schools acknowledging classroom locations will be relocated.By September 30, 2016, the Department will conduct onsite verification at Brookfield Elementary School and Davis K-8 School of relocated classrooms used for English language development instruction. |
| **Progress Report Due Date(s):** 06/15/201609/30/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 25 Institutional self-evaluation | **CPR Rating:** Not Implemented |
| **Department CPR Findings:** Document review and interviews indicated that the district has not evaluated all aspects of its K-12 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. |
| **Description of Corrective Action:** The district will utilize the Systemwide Administrators Meetings, chaired by the Deputy Superintendent and attended by administrators representing all programs in the district, to seek feedback [using group discussion activity] from administrators regarding the issue of equal access of programs to all students. Systemwide Administrators Meetings are scheduled several times per school year; at least one meeting per year will be devoted to institutional self-evaluation. The district will keep documentation of the meeting, including any findings, and steps taken to resolve any identified problems. |
| **Title/Role(s) of Responsible Persons:**Deputy Superintendent of Teaching & Learning;Executive Team | **Expected Date of Completion:**11/30/2016 |
| **Evidence of Completion of the Corrective Action:**Meeting agenda; meeting attendance sheet ; minutes of discussion; action plans [as appropriate] |
| **Description of Internal Monitoring Procedures:** To be monitored by Deputy Superintendent and Executive Team |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 25 Institutional self-evaluation | **Corrective Action Plan Status:** Approved **Status Date:** 02/19/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** June 15, 2016, submit agenda from a Systemwide Administrators Meeting at which discussion occurred regarding evaluating all aspects of the K-12 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. Include attendance sheet, meeting minutes and action plans/ next steps to be taken to evaluate all aspects of the K-12 program to ensure all students have equal access to all programs.By September 30, 2016, provide samples of the district's newly developed internal system for verifying that all aspects of the K-12 program are evaluated annually, such as surveys, templates or tools, used for the purpose of institutional self-evaluation of its K-12 programs to ensure equal access for protected categories. Submit additional meeting agendas, attendance sheets, meeting minutes and action plans, as necessary.By December 15, 2016, submit the results of the district's institutional self-evaluation utilizing these newly developed procedures along with goals/benchmarks/timelines for any identified areas of need. Include specific data collected. |
| **Progress Report Due Date(s):** 06/15/201609/30/201612/15/2016 |