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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: Holland

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 01/22/2016.

**Mandatory One-Year Compliance Date:** **01/22/2017**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 32 | Parent advisory council for special education | Partially Implemented |
| CR 6 | Availability of in-school programs for pregnant students | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 10C | Student Discipline | Partially Implemented |
| CR 17A | Use of physical restraint on any student enrolled in a publicly-funded education program | Implementation In Progress |
| CR 25 | Institutional self-evaluation | Partially Implemented |

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| **Criterion & Topic:**  SE 32 Parent advisory council for special education | | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Based on interviews, the district currently operates a regional parent advisory council that addresses the requirements of this criterion with representation from each school district. However, the district's DESE approved waiver has expired and needs to be renewed. | | | |
| **Description of Corrective Action:**  The Special Education Director will complete the Request for Waiver as provided in Special Education Regulations: Alternative Compliance 603 CMR 28.03(5). The Waiver will be submitted every three years for renewal.  Waiver submitted December 2015 | | | |
| **Title/Role(s) of Responsible Persons:**  Special Education Director | | **Expected Date of Completion:**  06/30/2016 | |
| **Evidence of Completion of the Corrective Action:**  Copies of Approved Waiver | | | |
| **Description of Internal Monitoring Procedures:**  Special Education Director will annually monitor dates for renewal | | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | | |
| **Criterion:**  SE 32 Parent advisory council for special education | **Corrective Action Plan Status:** Approved  **Status Date:** 02/29/2016  **Correction Status:** Not Corrected | | |
| **Basis for Decision:** | | | |
| **Department Order of Corrective Action:** | | | |
| **Required Elements of Progress Report(s):**  The district must provide a copy of the letter from the Department approving a waiver which allows Holland Public Schools to participate as a member of the larger Tantasqua Regional parent advisory council on special education by April 26, 2016. Please see the Administrative Advisory SPED 2015-2R: Special Education Parent Advisory councils, Acceptable Alternatives, and Use of Social Media: www.doe.mass.edu/sped/advisories/2015-2r.html | | | |
| **Progress Report Due Date(s):**  04/26/2016 | | | |

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| **Criterion & Topic:**  CR 6 Availability of in-school programs for pregnant students | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  While a specific policy on the availability of in-school programs for pregnant students is not required, a review of the district's documents indicates that students who are pregnant and wish to remain in school must first obtain the certification of a physician, which is not required for other physical or emotional conditions requiring the attention of a physician. Additionally, interviews demonstrated that staff members do not have a consistent understanding of the application of Title IX to these students. | | |
| **Description of Corrective Action:**  The Assistant Superintendent for Learning and Teaching will provide training for the Leadership Team on the following: Title IX: 20 U.S.C. 1681; 34 CFR 106.40(b)  Availability of in-school programs for pregnant students  1. Pregnant students are permitted to remain in regular classes and participate in extracurricular activities with non-pregnant students throughout their pregnancy, and after giving birth are permitted to return to the same academic and extracurricular program as before the leave.  2. The district does not require a pregnant student to obtain the certification of a physician that the student is physically and emotionally able to continue in school unless it requires such certification for all students for other physical or emotional conditions requiring the attention of a physician.  Principals will provide training to staff regarding the availability of in-school programs for pregnant students and the understanding of the application of Title IX to these students.  Policy JIE, Pregnant Students will be rescinded by June 2016 | | |
| **Title/Role(s) of Responsible Persons:**  Assistant Superintendent for Learning and Teaching  Principal | | **Expected Date of Completion:**  06/30/2016 |
| **Evidence of Completion of the Corrective Action:**  Copies of agendas, attendance sheets & handouts regarding training on Availability of in-school programs for pregnant students and Title IX application | | |
| **Description of Internal Monitoring Procedures:**  Yearly review of training | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 6 Availability of in-school programs for pregnant students | **Corrective Action Plan Status:** Approved  **Status Date:** 02/29/2016  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  The district must submit evidence of training for relevant staff on the applicability of Title IX to pregnant students and the discontinuation of requiring a physician's certification for pregnant students, along with an agenda, signed attendance sheets, and examples of training materials, by April 26, 2016.  Submit the school committee's approved meeting minutes or a link to the approved minutes, demonstrating the rescinding of policy JIE on pregnant students, by October 14, 2016. | | |
| **Progress Report Due Date(s):**  04/26/2016  10/14/2016 | | |

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| **Criterion & Topic:**  CR 10A Student handbooks and codes of conduct | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Document review indicates that the student handbook does not include a nondiscrimination policy that references and is consistent with M.G.L. c.76, s.5 to affirm the school's non-tolerance for harassment and discrimination based on race, color, national origin, sex, gender identity, religion or sexual orientation. The policy does not consistently include the protected category of gender identity when it is cited throughout the handbook. Also, the handbook does not include the procedural requirements applied to students not yet determined to be eligible for special education. | | |
| **Description of Corrective Action:**  Review and update documents , including the district handbook to include:  1. Nondiscrimination policy that references and is consistent with M.G.L. c.76, s.5 to affirm the school non-tolerance for harassment and discrimination based on race, color, national origin, sex, gender identity, religion or sexual orientation.  2. The protected category of gender identity  3. The procedural requirements applied to students not yet determined to be eligible for special education.  Review updated handbook, including nondiscrimination policies, and procedural requirements applied to students not yet determined to eligible for special education with staff during beginning of the year monthly staff meeting:  (August& September 2016) | | |
| **Title/Role(s) of Responsible Persons:**  Special Education Director  Principal | | **Expected Date of Completion:**  09/23/2016 |
| **Evidence of Completion of the Corrective Action:**  Copy of updated Handbook which includes references and is consistent with M.G.L. c.76, s.5 to affirm the school non-tolerance for harassment and discrimination based on race, color, national origin, sex, gender identity, religion or sexual orientation.  Copies of agendas, attendance sheets & handouts regarding training | | |
| **Description of Internal Monitoring Procedures:**  Comprehensive yearly review of handbook, communications and policy. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Partially Approved  **Status Date:** 02/29/2016  **Correction Status:** Not Corrected | |
| **Basis for Decision:**  The district's description or evidence of completion of corrective action does not address the Department's finding at the CPR that the nondiscrimination policy, when cited throughout the handbook, does not consistently include the protected category of gender identity. | | |
| **Department Order of Corrective Action:**  The district must ensure that the nondiscrimination policy that includes the protected category of gender identity is cited consistently throughout the student handbook. | | |
| **Required Elements of Progress Report(s):**  The district must submit a copy of the revised student handbook or a web link to the revised posted student handbook that includes: (1) the revised nondiscrimination policy that is consistent with M.G.L. c.76, s. 5, includes the protected category of gender identity and is consistently cited throughout; and (2) the procedural requirements applied to students not yet determined to be eligible for special education by April 26, 2016.  Submit evidence that the updated nondiscrimination policy and procedures have been disseminated to staff, students and parents for the 2015-2016 school year by April 26, 2016. | | |
| **Progress Report Due Date(s):**  04/26/2016 | | |

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| **Criterion & Topic:**  CR 10C Student Discipline | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicates that the district implements the regional policy and procedures but has not yet had the school committee adopt discipline procedures consistent with 37H¾. The regional policy does not identify specific educational services or a contact person at Holland Elementary School. In addition, the regional policy lacks the requirement for the principal to send written determination of out-of-school suspensions and the reason for such suspensions in pre-K through grade 3 to the Superintendent. Document review also demonstrated that the district's written notice of suspension does not include the following: 1) evidence the notice is provided to the student; 2) an opportunity for the student to dispute the charges and present an explanation; or 3) the date, time and location of the hearing. In addition, the written notice requires that parents attend a re-entry meeting prior to the student's return to school, which is not required by regulation and may extend the student's exclusion from school. | | |
| **Description of Corrective Action:**  Review and update district Policy JKK to be consistent with 37H ¾, including identifying specific educational services and a contact person at Holland Elementary School.    Review and update document: Written Notice of Suspension, to include the following:  1. Evidence the notice is provided to the student  2. An opportunity for the student to dispute the charges and present and explanation  3. The date, time, and location of the hearing  4. Rescind the requirement that the parent attend a re-entry meeting prior to the students return to school , which is not required by regulation and may extend the student’s exclusion from school  School Committee adoption of revised policy JKK- to be consistent with 37H 3/4 | | |
| **Title/Role(s) of Responsible Persons:**  Assistant Superintendent of Teaching and Learning  Principal | | **Expected Date of Completion:**  09/30/2016 |
| **Evidence of Completion of the Corrective Action:**  Copy of updated Policy  Copy of updated Letter | | |
| **Description of Internal Monitoring Procedures:**  Yearly review of policy and handbook | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10C Student Discipline | **Corrective Action Plan Status:** Partially Approved  **Status Date:** 02/29/2016  **Correction Status:** Not Corrected | |
| **Basis for Decision:**  The district's description or evidence of completion of corrective action do not address the Department's finding at the CPR that the regional student discipline policy did not include the requirement for the principal to send written determination of out-of-school suspensions and the reason for such suspensions in pre-K through grade 3 to the Superintendent. | | |
| **Department Order of Corrective Action:**  The district must ensure that the revised student discipline policy and procedures accepted by the Holland School Committee include the requirement for the principal to send written determination of out-of-school suspensions and the reason for such suspensions in pre-K through grade 3 to the Superintendent. | | |
| **Required Elements of Progress Report(s):**  The district must submit a copy of the revised student discipline policy and procedures approved by the school committee that: (1) identify specific educational services; (2) identify a contact person at the elementary school; and (3) include the requirement for the principal to send written determination of out-of-school suspensions and the reason for such suspensions in pre-K through grade 3 to the Superintendent by April 26, 2016.  Submit the updated Written Notice of Suspension, which will include (1) evidence notice is provided to the student; (2) an opportunity for the student to dispute the charges and present an explanation; (3) date, time and location of the hearing; and (4) removal of the requirement for a re-entry meeting prior to the student's return to school by April 26, 2016.  Submit evidence of training on the revised policy and procedures to the Leadership Team, including the training agenda, examples of training materials, and signed attendance sheets by April 26, 2016. | | |
| **Progress Report Due Date(s):**  04/26/2016 | | |

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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 indicate the district meets all current requirements for the use of physical restraint. Interviews demonstrate that the district has begun the revision of its written policies and procedures; identified and provided in-depth training to program staff to serve as school wide resources for both de-escalation and the administration of restraint; and training is planned in January 2016, for all staff on the district's revised restraint prevention and behavior support policy and procedures. | | |
| **Description of Corrective Action:**  Description of Corrective Action:  1. The Special Education Director will review with the Leadership Team:  A. methods for preventing student violence, self-injurious behavior and suicide; methods for engaging parents and youth in discussions about restraint prevention and use; a description and explanation of the program's alternatives to physical restraint and method of physical restraint in emergency situations; a statement prohibiting: medication restraint, mechanical restraint, prone restraint unless permitted pursuant to 603 CMR 46.03(1)(b), seclusion, and the use of restraint inconsistent with 603 CMR 46.03; a description of the program's training requirements, reporting requirements, and follow-up procedures; a procedure for receiving and investigating complaints; a procedure for conducting periodic review of data and documentation on the program’s use of restraint; a procedure for implementing the reporting requirements; a procedure for making both oral and written notification to the parent; and a procedure for the use of time-out  2. Principal will review with all staff the revised restraint prevention and behavior support policy and procedures.  3. The Superintendent will submit revisions of District Policy JKAA (Restraint) to school committee for adoption | | |
| **Title/Role(s) of Responsible Persons:**  Superintendent, Special Education Director  Principal | | **Expected Date of Completion:**  09/30/2016 |
| **Evidence of Completion of the Corrective Action:**  Copy of revised Policy JKAA  Copies of agendas, attendance sheets & handouts regarding training | | |
| **Description of Internal Monitoring Procedures:**  Yearly review of policy and training. | | |
| 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:** 02/29/2016  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit the updated restraint prevention and behavior support policy and procedures, which include 1) methods to prevent student violence, self-injurious behavior and suicide; 2) methods to engage parents and youth in discussion about restraint prevention and use; 3) an explanation of the alternatives to physical restraint and method of physical restraint in emergency situations; 4) the prohibition of certain restraints; reporting requirements; follow-up procedures; 5) a procedure for receiving and investigating complaints; 6) a procedure for conducting periodic review of data and documentation on the use of restraint; 7) a procedure to implement the reporting requirements; 8) a procedure to make both oral and written notification to the parent; and 9) a procedure to use time-out by April 26, 2016.  Submit evidence of training to staff, including training materials, agenda and signed attendance by April 26, 2016. | | |
| **Progress Report Due Date(s):**  04/26/2016 | | |

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| **Criterion & Topic:**  CR 25 Institutional self-evaluation | | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicates that the district does not formally evaluate all aspects of its K-6 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 review and develop a formal evaluation process which will include:  1. the evaluation all aspects of its K-6 program 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.  2. Develop a survey  3. Analyze data  4. Leadership training of any recommended changes  5. Staff training of any recommended changes | | | |
| **Title/Role(s) of Responsible Persons:**  Assistant Superintendent for Learning and Teaching  Special Education Director  Principal | | **Expected Date of Completion:**  11/30/2016 | |
| **Evidence of Completion of the Corrective Action:**  Copies of survey, documentation of analysis and process, training agendas used by the district to ensure equal access for all students | | | |
| **Description of Internal Monitoring Procedures:**  Yearly evaluation, results and training. | | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | | |
| **Criterion:**  CR 25 Institutional self-evaluation | **Corrective Action Plan Status:** Approved  **Status Date:** 02/29/2016  **Correction Status:** Not Corrected | | |
| **Basis for Decision:** | | | |
| **Department Order of Corrective Action:** | | | |
| **Required Elements of Progress Report(s):**  The district must submit a detailed description of the components that will be included in the formal evaluation to ensure that any that students from any protected category are not excluded from participating in any program or extracurricular activity. This will include the timeline for distributing, collecting and analyzing the surveys developed as well as a narrative description of how the district will ensure the evaluation's annual use by April 26, 2016.  The district must submit a copy of the institutional self-evaluation, conclusions reached, and resolution of any identified issues by October 14, 2016. | | | |
| **Progress Report Due Date(s):**  04/26/2016  10/14/2016 | | | |