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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: Community Day Charter Public School - Prospect (District)

CPR Onsite Year: 2016-2017

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 02/28/2017.

**Mandatory One-Year Compliance Date:** **02/27/2018**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 18A | IEP development and content | Partially Implemented |
| CR 17A | Use of physical restraint on any student enrolled in a publicly-funded education program | Partially Implemented |
| CR 25 | Institutional self-evaluation | Partially Implemented |
| CR 26A | Confidentiality and student records | Partially Implemented |

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| **Criterion & Topic:** SE 18A IEP development and content | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of student records and staff interviews indicated that for students whose disability affects social skill development, or when the student's disability makes him or her vulnerable to bullying, harassment, or teasing, the IEP does not consistently address the skills and proficiencies needed to avoid and respond to bullying, harassment, or teasing. |
| **Description of Corrective Action:** Special Education staff members received additional training during a January 2017 special education staff meeting on considering and specifically addressing in the student’s current IEP the skills and proficiencies needed to avoid and respond to bullying, harassment or teasing for this student with vulnerability to bullying, harassing and teasing. In addition, a specific student’s file now contains a signed IEP including information on IEP8 that addresses potential bullying. |
| **Title/Role(s) of Responsible Persons:**Rebecca Morse, Director of Special Education | **Expected Date of Completion:**01/03/2017 |
| **Evidence of Completion of the Corrective Action:**Special Education staff members signed that they received this additional training at the January 2017 special education staff meeting. In addition the specific student’s file contains a signed IEP including information on IEP8 that addresses how the student will develop the skills and requirements necessary to address potential vulnerability to bullying and teasing as well as accommodations that are in place to support the student in this area. |
| **Description of Internal Monitoring Procedures:** Director will oversee all IEPs for students who may be vulnerable to bullying to ensure compliance in this area. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 18A IEP development and content | **Corrective Action Plan Status:** Partially Approved **Status Date:** 04/13/2017 **Correction Status:** Not Corrected |
| **Basis for Decision:** The charter school submitted evidence of training (Staff Advisory dated 1/3/2017 and signatures of staff participants) on addressing the skills and proficiencies needed to avoid and respond to bullying, harassment, or teasing in IEPs of students whose disability affects social skill development, or when the student's disability makes him or her vulnerable to bullying, harassment, or teasing. The charter school must also develop an internal tracking system to ensure compliance, and conduct an internal review of a sample of student records subsequent to all corrective action. |
| **Department Order of Corrective Action:**The charter school will reconvene IEP Teams for students listed on the Student Record Issues Worksheet to ensure that, where evaluations indicated that a student's disability affects social skills development, or when the student's disability makes him or her vulnerable to bullying, harassment, or teasing, the IEP addresses skills and proficiencies needed to avoid and respond to bullying, harassment, or teasing. The charter school will develop an internal tracking system to ensure compliance, and will conduct an internal review of student records across several grade levels subsequent to all corrective action.\* Please note when conducting internal monitoring the charter school 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). |
| **Required Elements of Progress Report(s):** By September 28, 2017, the charter school will submit evidence that, for students listed on the Student Record Issues Worksheet, IEP Teams reconvened to consider and address the need for appropriate skills development. By September 28, 2017, the charter school will submit a detailed description of the school's internal oversight and tracking system, including the name and role of the person designated for oversight. By November 30, 2017, the charter school will provide the results of an internal record review, indicating the number of records reviewed; the number found to be compliant; an explanation of the root cause(s) for any continued non-compliance; and a description of any additional corrective actions taken by the district to address any identified non-compliance. |
| **Progress Report Due Date(s):** 09/28/201711/30/2017 |

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| **Criterion & Topic:** CR 17A Use of physical restraint on any student enrolled in a publicly-funded education program | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that the charter school's physical restraint prevention and behavior support policy and procedures do not include the following information consistent with regulations under 603 CMR 46.00: 1) methods for preventing student violence, self-injurious behavior, and suicide; 2) methods for engaging parents and youth in discussions about restraint prevention and use; 3) a description and explanation of the program's alternatives to physical restraint and method of physical restraint in emergency situations; 4) a statement prohibiting medication restraint, mechanical restraint, prone restraint unless permitted pursuant to 603 CMR 46.03(1)(b); and 5) a procedure for making reasonable efforts to orally notify a parent of the use of restraint on a student within 24 hours of the restraint. |
| **Description of Corrective Action:** We have updated our physical restraint policy which addresses areas 1-5 as noted above, as well as our physical restraint form. |
| **Title/Role(s) of Responsible Persons:**Brent Merten, Deputy Executive Director of Operations | **Expected Date of Completion:**08/21/2017 |
| **Evidence of Completion of the Corrective Action:**All staff will be briefed on the updated physical restraint policy during orientation for the 2017-18 school year. Our orientation is scheduled for August 1-18, 2017, with an expected completed date before the first day of school on August 21, 2017. All staff hired after orientation will be trained as part of the hiring process and review of school policies.The updated policy and form will be submitted in WBMS. |
| **Description of Internal Monitoring Procedures:** Yearly staff sign-in sheets will be maintained at the school level as evidence of completed trainings in regards to our policy. |
| 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:** 04/13/2017 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 28, 2017, the charter school will submit a copy or link to the school's updated restraint policy.By September 28, 2017, the charter school will submit evidence of staff training (agenda, sign-in sheet, sample training materials) on the updated physical restraint policy. |
| **Progress Report Due Date(s):** 09/28/2017 |

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| **Criterion & Topic:** CR 25 Institutional self-evaluation | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that, while the charter school annually evaluates all aspects of its preschool through grade eight programming to ensure that all students, regardless of race, color, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities, this process does not include the protected categories of sex and gender identity. |
| **Description of Corrective Action:** We have updated our Institutional Self-Evaluation document which includes all protected categories, including sex and gender identity. |
| **Title/Role(s) of Responsible Persons:**Brent Merten, Deputy Executive Director of Operations | **Expected Date of Completion:**08/21/2017 |
| **Evidence of Completion of the Corrective Action:**All staff will be briefed on the Institutional Self-Evaluation during orientation for the 2017-18 school year. Our orientation is scheduled for August 1-18, 2017, with an expected completed date before the first day of school on August 21, 2017. All staff hired after orientation will be trained as part of the hiring process and review of school policies.The updated document will be submitted in WBMS. |
| **Description of Internal Monitoring Procedures:** Yearly staff sign-in sheets will be maintained at the school level as evidence of completed trainings in regards to our policy. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 25 Institutional self-evaluation | **Corrective Action Plan Status:** Partially Approved **Status Date:** 04/13/2017 **Correction Status:** Not Corrected |
| **Basis for Decision:** The charter school stated that they updated their Institutional Self-Evaluation document to include sex and gender identity as protected categories, and plan to provide training on the updated non-discrimination statement. However, the charter school did not propose to conduct a self-evaluation that takes into account the protected categories of sex and gender identity. |
| **Department Order of Corrective Action:**The charter school will conduct an institutional self-evaluation that takes into consideration all protected categories, including sex and gender identity. |
| **Required Elements of Progress Report(s):** By September 28, 2017, the charter school will provide to the Department a link to the updated non-discrimination statement and a link to the updated Institutional Self-Evaluation document that includes all protected categories, including sex and gender identity. By September 28, 2017, the school will submit evidence of staff training (training agenda, signed attendance sheets, sample of materials). By November 30, 2017, the charter school will submit a copy or description of the results and outcomes of their self-evaluation, including outcomes related to sex and gender identity. |
| **Progress Report Due Date(s):** 09/28/201711/30/2017 |

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| **Criterion & Topic:** CR 26A Confidentiality and student records | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of student records indicated that English learner education records do not include a log of access. |
| **Description of Corrective Action:** We have included a records log of access to include in all ELE student records to record access to individual files. |
| **Title/Role(s) of Responsible Persons:**Brent Merten, Deputy Executive Director of Operations | **Expected Date of Completion:**08/21/2017 |
| **Evidence of Completion of the Corrective Action:**All staff will be briefed on the use of ELE records access logs during orientation for the 2017-18 school year. Our orientation is scheduled for August 1-18, 2017, with an expected completed date before the first day of school on August 21, 2017. All staff hired after orientation will be trained as part of the hiring process and review of school policies.The updated document will be submitted in WBMS. |
| **Description of Internal Monitoring Procedures:** Yearly staff sign-in sheets will be maintained at the school level as evidence of completed trainings in regards to our policy. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 26A Confidentiality and student records | **Corrective Action Plan Status:** Partially Approved **Status Date:** 04/13/2017 **Correction Status:** Not Corrected |
| **Basis for Decision:** The charter school proposes training on the use of ELE record access logs during orientation August 1-18, 2017. The charter school did not provide a detailed description of their internal monitoring and tracking system to ensure staff members are signing the access log when receiving or viewing ELE student records. |
| **Department Order of Corrective Action:**Develop an internal oversight and tracking system to ensure staff members sign the log of access when accessing ELE student records. The tracking system should include periodic reviews by an administrator to ensure continuing compliance. Conduct a review of a sample of ELE student records across grade levels for evidence that staff members sign the log of access when accessing these records. \* Please note when conducting internal monitoring the charter school 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). |
| **Required Elements of Progress Report(s):** By September 28, 2017, submit to the Department a copy of the log of access sheet for ELE student records. By September 28, 2017, submit evidence of training (agenda, signed/dated attendance list with staff role and materials used). By September 28, 2017, provide a detailed description of the charter school's internal oversight and tracking system, including the name and role of the person designated for oversight. By November 30, 2017, submit the results of an internal review of ELE student records, indicating the number of records reviewed; the number found to be compliant; an explanation of the root cause(s) for any continued non-compliance; and a description of any additional corrective actions taken by the school to address any identified non-compliance. |
| **Progress Report Due Date(s):** 09/28/201711/30/2017 |