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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: City on a Hill Charter Public School Dudley Square (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 09/19/2017.

**Mandatory One-Year Compliance Date:** **09/19/2018**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 7 | Transfer of parental rights at age of majority and student participation and consent at the age of majority | Partially Implemented |
| CR 3 | Access to a full range of education programs | Partially Implemented |
| CR 8 | Accessibility of extracurricular activities | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 10B | Bullying Intervention and Prevention | Partially Implemented |
| CR 18A | School district employment practices | Partially Implemented |
| CR 24 | Curriculum review | Partially Implemented |
| CR 25 | Institutional self-evaluation | Partially Implemented |
| ELE 10 | Parental Notification | Partially Implemented |

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

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| **Criterion & Topic:**  SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of student records indicated that when students reach the age of 18, the charter school does not consistently implement procedures to obtain consent from the student with decision-making authority to continue the student's special education program. | | |
| **Description of Corrective Action:**  We reviewed the procedures that were accepted by DESE for AoM at Circuit in 2015, and are the same procedures for Dudley.  We created an excel spreadsheet that tracks students' date of birth, when they will turn 17, when turn 18, when they were given the Notice of AoM, when they made their decision, and when they signed their own IEP.  We determined that we should put students on the spreadsheet that were:  - in the 14 names reviewed by DESE last year (attached)  - turned 17 over the summer  - turned 18 over the summer  - any students still at CoaH (w/IEPs) that have turned 18  The Supervisor entered the Notice Given, Decision Made and IEP Signed dates are in eSped and in the tracker.  We then reviewed the tracker looking for trends, and compared the new procedures to the current practice. The Supervisor and Administrator realized that though the Supervisor was having students sign their Decision Form when they turned 18, that the IEP was not being signed at that time. The Supervisor was waiting until the next IEP meeting occurred, a new IEP created, then had the 18 year old sign their own IEP.  The updated understanding of the procedure is being followed by Supervisor now, since late last school year.  We determined that the responsibility to handle all aspects of the Age of Majority, except discussing it at the IEP meeting during which a student will turn 17, is that of the Supervisor, not the sped teachers. However, the Administrator and Supervisor will run a training for the LN dept. in November, explaining the overall process and their part in it, and have the team sign the Agenda/Attendance sheet. | | |
| **Title/Role(s) of Responsible Persons:**  Allison King, SpEd Supervisor, Dudley. Day Farenga, SpEd Administrator, Network | | **Expected Date of Completion:**  12/15/2017 |
| **Evidence of Completion of the Corrective Action:**  The excel spreadsheet of the students identified above, including their Age of Majority dates, will be uploaded through "Additional Documents" on the WBMS. It has two tabs, the top sheet has those students in order of birthdate turning 18; the second sheet has the same data organized by last name. ( Fields shaded green are issues that were found; blue shaded fields are for dates that are not yet of concern.) | | |
| **Description of Internal Monitoring Procedures:**  The Supervisor will continue to follow the procedures, entering data into eSped and this tracker. In mid-December, the Administrator will review the tracker and spot check that IEPs have been signed and dated, Decision forms signed and dated. If there are any issues, then the Administrator will continue to check on the tracker and checking all IEPs that should be signed, to ensure that new procedural habits take hold.  In addition, the agenda and attendance sheet from the AoM PD done in November will be uploaded in December. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority | **Corrective Action Plan Status:** Approved  **Status Date:** 11/01/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By January 10, 2018, submit a report of the review of student records following training on the tracking process to determine that IEPs have been signed by the 18 year old student and dated; include the excel spreadsheet of the students with their Age of Majority dates. Identify the number of student records reviewed, the number of records in compliance, and for any records not in compliance, determine the root cause(s) of the non-compliance and the district's plan to remedy the non-compliance. | | |
| **Progress Report Due Date(s):**  01/10/2018 | | |

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

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| **Criterion & Topic:**  CR 3 Access to a full range of education programs | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that the charter school's policy regarding equal access to educational programs does not include the protected categories of gender identity and homelessness. | | |
| **Description of Corrective Action:**  The Student Handbook and website were updated to include this language. The website can be found here: https://www.cityonahill.org/anti-discrimination-statement/ | | |
| **Title/Role(s) of Responsible Persons:**  Deputy Chief Academic Officer, Cristin Berry Pizzimenti | | **Expected Date of Completion:**  09/28/2017 |
| **Evidence of Completion of the Corrective Action:**  The evidence can be found on the website: https://www.cityonahill.org/anti-discrimination-statement/ and also the Student Handbooks are linked to the website here: https://www.cityonahill.org/students-families/important-documents/ | | |
| **Description of Internal Monitoring Procedures:**  As Deputy Chief Academic Officer, I will review the core Student Handbook for language and updated laws and will update this handbook before sending to individual school leaders to add school-specific items. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 3 Access to a full range of education programs | **Corrective Action Plan Status:** Approved  **Status Date:** 10/19/2017  **Correction Status:** Corrected | |
| **Basis for Decision:**  The district revised the non-discrimination policy statement so that it includes all protected categories as required by regulation including gender identity and homelessness. The district has published this policy statement on the website and in all student, family, and staff handbooks. | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):** | | |
| **Progress Report Due Date(s):** | | |

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

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| **Criterion & Topic:**  CR 8 Accessibility of extracurricular activities | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that the charter school's policy regarding equal access to athletics does not include the protected categories of sex, gender identity, color, religion, national origin, sexual orientation, disability, and homelessness. | | |
| **Description of Corrective Action:**  The anti-discrimination policy has been updated to include all of these groups of people and extended to all school groups, including athletics and extracurriculars. This has been updated in the Student Handbook. | | |
| **Title/Role(s) of Responsible Persons:**  Deputy Chief Academic Officer, Cristin Berry Pizzimenti | | **Expected Date of Completion:**  09/28/2017 |
| **Evidence of Completion of the Corrective Action:**  The evidence can be found on the website: https://www.cityonahill.org/anti-discrimination-statement/ and also the Student Handbooks are linked to the website here: https://www.cityonahill.org/students-families/important-documents/ | | |
| **Description of Internal Monitoring Procedures:**  As Deputy Chief Academic Officer, I will review the core Student Handbook for language and updated laws and will update this handbook before sending to individual school leaders to add school-specific items. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 8 Accessibility of extracurricular activities | **Corrective Action Plan Status:** Approved  **Status Date:** 10/19/2017  **Correction Status:** Corrected | |
| **Basis for Decision:**  The district revised the non-discrimination policy statement so that it includes all protected categories as required by regulation. The district has published this policy statement on the website and in all student, family, and staff handbooks, and in all areas that relate to athletics and extracurricular activities. | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):** | | |
| **Progress Report Due Date(s):** | | |

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

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| **Criterion & Topic:**  CR 10A Student handbooks and codes of conduct | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that the non-discrimination statement as contained in the charter school's student handbook does not include gender identity. | | |
| **Description of Corrective Action:**  The Student Handbook and website were updated to include this language. The website can be found here: https://www.cityonahill.org/anti-discrimination-statement/ | | |
| **Title/Role(s) of Responsible Persons:**  Deputy Chief Academic Officer, Cristin Berry Pizzimenti | | **Expected Date of Completion:**  09/28/2017 |
| **Evidence of Completion of the Corrective Action:**  The evidence can be found on the website: https://www.cityonahill.org/anti-discrimination-statement/ and also the Student Handbooks are linked to the website here: https://www.cityonahill.org/students-families/important-documents/ | | |
| **Description of Internal Monitoring Procedures:**  As Deputy Chief Academic Officer, I will review the core Student Handbook for language and updated laws and will update this handbook before sending to individual school leaders to add school-specific items. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Approved  **Status Date:** 10/19/2017  **Correction Status:** Corrected | |
| **Basis for Decision:**  The district revised the non-discrimination policy statement so that it includes all protected categories as required by regulation, including gender identity. The district has published this policy statement on the website and in all student, family, and staff handbooks. | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):** | | |
| **Progress Report Due Date(s):** | | |

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

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| **Criterion & Topic:**  CR 10B Bullying Intervention and Prevention | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of the student handbook posted on the charter school's website indicated that the definition of bullying is not consistent with the amendments to the Massachusetts anti-bullying law, which became effective July 1, 2013. Specifically, the definition of bullying does not extend protections to students who are bullied by a member of the school staff. | | |
| **Description of Corrective Action:**  The definition for bullying was updated in the Student Handbook using the language from the anti-bullying 2013 law. | | |
| **Title/Role(s) of Responsible Persons:**  Deputy Chief Academic Officer, Cristin Berry Pizzimenti | | **Expected Date of Completion:**  09/28/2017 |
| **Evidence of Completion of the Corrective Action:**  The evidence can be found in the Student Handbooks that are linked to the website here: https://www.cityonahill.org/students-families/important-documents/ | | |
| **Description of Internal Monitoring Procedures:**  As Deputy Chief Academic Officer, I will review the core Student Handbook for language and updated laws and will update this handbook before sending to individual school leaders to add school-specific items. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10B Bullying Intervention and Prevention | **Corrective Action Plan Status:** Approved  **Status Date:** 10/19/2017  **Correction Status:** Corrected | |
| **Basis for Decision:**  The district updated the Bullying Prevention and Intervention Plan on its website and in all student, family, and staff handbooks to reflect the amendments to the 2013 Massachusetts anti-bullying law. | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):** | | |
| **Progress Report Due Date(s):** | | |

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

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| **Criterion & Topic:**  CR 18A School district employment practices | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of the charter school's hiring and recruitment documents indicated that gender identity is not included as a protected category. | | |
| **Description of Corrective Action:**  The personnel handbook has been updated to include gender identity as a protected group. | | |
| **Title/Role(s) of Responsible Persons:**  Cristin Berry Pizzimenti, Deputy Chief Academic Officer | | **Expected Date of Completion:**  10/10/2017 |
| **Evidence of Completion of the Corrective Action:**  The personnel handbook has been updated to include gender identity as a protected group. | | |
| **Description of Internal Monitoring Procedures:**  Each year in the summer, the HR Manager will update the personnel handbook for the upcoming school year. The handbook will be checked by other members of the Network to ensure all policies and statements are updated with correct language. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 18A School district employment practices | **Corrective Action Plan Status:** Approved  **Status Date:** 10/19/2017  **Correction Status:** Corrected | |
| **Basis for Decision:**  The district revised the non-discrimination policy statement so that it includes all protected categories as required by regulation, including gender identity. The district has published this policy statement on the website and in all student, family, and staff handbooks. | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):** | | |
| **Progress Report Due Date(s):** | | |

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

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| **Criterion & Topic:**  CR 24 Curriculum review | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicated that the charter school does not have a consistent procedure that ensures individual teachers review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation. | | |
| **Description of Corrective Action:**  Teachers at City on a Hill review curriculum regularly during PD and common planning times. To ensure that curriculum is reviewed for generalizations, the Curriculum Coordinators (team of teachers across the schools who oversee curriculum and assessment) will train their departments on how to review materials in this way. The Curriculum Coordinators will be trained at our November 1st meeting and they will then have 7 weeks to complete their department training. | | |
| **Title/Role(s) of Responsible Persons:**  Cristin Berry Pizzimenti, Deputy Chief Academic Officer | | **Expected Date of Completion:**  12/30/2017 |
| **Evidence of Completion of the Corrective Action:**  The sign-in sheet for the Curriculum Coordinators meeting and the training documents. | | |
| **Description of Internal Monitoring Procedures:**  In the Spring, I will review this process with the Curriculum Coordinators for effectiveness and this review will inform the process for the following school year. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 24 Curriculum review | **Corrective Action Plan Status:** Approved  **Status Date:** 10/19/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit evidence of Coordinator training and staff training; include agenda, training materials, and signed attendance sheets by January 10, 2018. | | |
| **Progress Report Due Date(s):**  01/10/2018 | | |

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

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| **Criterion & Topic:**  CR 25 Institutional self-evaluation | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicated that the charter school has a process to gather information to ascertain equal access for all students to all school programs, including athletics and other extracurricular activities; however, there is no evidence that the charter school analyzed the data collected using this process or determined any needed changes in programming as a result. | | |
| **Description of Corrective Action:**  During the school year, the Athletic Director will track which students participate in which extracurricular and athletic events. The student information system, SchoolBrains, will track student participation in school groups that happen during school. At the end of the school year, the Network Data Team will collect the tracking systems from the Athletic Directors and conduct analysis about school group participation for Principals during their annual June Principal Summit. Principals will then make changes to their programming. | | |
| **Title/Role(s) of Responsible Persons:**  Cristin Berry Pizzimenti, Deputy Chief Academic Officer | | **Expected Date of Completion:**  06/30/2017 |
| **Evidence of Completion of the Corrective Action:**  The analysis produced by the Network Data Team will be evidence of completion. | | |
| **Description of Internal Monitoring Procedures:**  This will be the process for each school year. I will check in with Athletic Directors annually to ensure that tracking systems are established so end of the year data can be analyzed. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 25 Institutional self-evaluation | **Corrective Action Plan Status:** Partially Approved  **Status Date:** 11/01/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:**  The district has described the numerical data collection process that will be used to assess student access to school groups, activities, and athletics. However, the district did not submit examples of survey tools that might be implemented to gain feedback from students, faculty, and parents to determine that students have equal access to all programs, including athletics and other extracurricular activities. | | |
| **Department Order of Corrective Action:**  Submit the samples of tools that have been developed to solicit feedback on student access to all programs, extracurriculars, and athletics.  Submit the summary evaluation including description of data sources, with analysis and recommendations for actions as a result of responses. | | |
| **Required Elements of Progress Report(s):**  Submit the tools and protocols that have been developed to solicit feedback on student access to all programs, extracurriculars, and athletics by March 7, 2018. Submit the summary report and analysis, including recommendations for actions as a result of responses by June 20, 2018. | | |
| **Progress Report Due Date(s):**  03/07/2018  06/20/2018 | | |

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

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| **Criterion & Topic:**  ELE 10 Parental Notification | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of student records and interviews indicated that, although the charter school provides translated versions of the Parent Notification Letter and report card and progress report templates, progress notes and handwritten information are not translated. | | |
| **Description of Corrective Action:**  All handwritten notes on English language parent notification letters are now translated and copied onto translated letters. Comments, which were written in English, have been eliminated from all students' report cards, Network-wide. There were also findings that progress notes found in students' files are not translated. These progress notes are gathered from teachers quarterly and are used to monitor progress and for reclassification purposes by the ELL Director and EL Case Managers. They are not sent home to parents. | | |
| **Title/Role(s) of Responsible Persons:**  Julia Latino, ELL Network Director | | **Expected Date of Completion:**  10/10/2017 |
| **Evidence of Completion of the Corrective Action:**  Evidence can be found in hardcopy, in students' files. | | |
| **Description of Internal Monitoring Procedures:**  Each year, the ELL Director and Deputy Chief Academic Officer will review to ensure all correspondence to parents is appropriately translated. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  ELE 10 Parental Notification | **Corrective Action Plan Status:** Approved  **Status Date:** 10/19/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit the results of an internal review of student records where communications and documentation have been requested in a home language other than English, determine that all parts of parent notification letters, report cards, and progress reports have been provided in the home language with evidence maintained in the student record by January 10, 2017.  Indicate the number of records that were reviewed, the number of records that were in full compliance, an explanation of the root cause for any records found to be not in compliance, and a description of the specific corrective action taken by the district to address any identified 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):**  01/10/2018 | | |