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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: Worthington (non-op)

CPR Onsite Year: 2017-2018

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 12/28/2017.

**Mandatory One-Year Compliance Date:** **12/28/2018**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 46 | Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district | 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 12A | Annual and continuous notification concerning nondiscrimination and coordinators | Partially Implemented |
| CR 17A | Use of physical restraint on any student enrolled in a publicly-funded education program | Partially Implemented |
| CR 18A | School district employment practices | Partially Implemented |
| CR 20 | Staff training on confidentiality of student records | Not Implemented |
| CR 21 | Staff training regarding civil rights responsibilities | Not Implemented |
| CR 25 | Institutional self-evaluation | Not Implemented |

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

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| **Criterion & Topic:**  SE 46 Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Document review and interviews indicated that the procedures for the discipline of students with disabilities do not address:  the requirements when the Team determines that the behavior is a manifestation of the disability;  the requirements when the Team determines that the behavior is not a manifestation of the disability;  the requirement to continue to provide general curriculum and IEP services while the student is in an interim alternative educational setting; and  the requirement to notify the parent of the decision to suspend and to provide the written notice of procedural safeguards. | | |
| **Description of Corrective Action:**  We were not compliant because we are a new school and in the process of creating policy. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz, Principal  Emily Lak, Special Education Teacher | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  Revise the policy and procedure in student handbook and include specific assessments to determine that the behavior is a manifestation of the behavior.  Emily Lake and Gretchen Morse-Dobosz will revise policy and procedure and be trained. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz Emily Lak | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 46 Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district | **Corrective Action Plan Status:** Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit the revised procedures for the discipline of students with disabilities that address: 1) the requirements when the Team determines that the behavior is a manifestation of the disability; 2) the requirements when the Team determines that the behavior is not a manifestation of the disability; 3) the requirement to continue to provide general curriculum and IEP services while the student is in an interim alternative educational setting; and 4) the requirement to notify the parent of the decision to suspend and to provide the written notice of procedural safeguards by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018  05/22/2018 | | |

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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:**  Document review and interviews indicated that the student handbook and code of conduct do not contain:  procedures for the discipline of students with disabilities (see SE 46), students with Section 504 Accommodation Plans and students not yet determined eligible for special education;  procedures assuring due process in disciplinary proceedings (see CR 10C); or  procedures for accepting, investigating and resolving complaints alleging discrimination or harassment and the disciplinary measures that the school may impose if it is determined  either has occurred.  In addition, the district has not developed a code of conduct for teachers. | | |
| **Description of Corrective Action:**  We did not include specific language for assuring due process, appropriate procedures for discipline of students with disabilities, IEP's and 504's. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  We will update the handbook to include the missing language. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Partially Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:**  The district's description and evidence of completion of corrective action do not address including procedures for accepting, investigating and resolving complaints alleging discrimination or harassment and the disciplinary measures that the school may impose if it is determined either has occurred in the student handbook or developing a code of conduct for teachers. | | |
| **Department Order of Corrective Action:**  The district must include procedures for accepting, investigating and resolving complaints alleging discrimination or harassment and the disciplinary measures that the school may impose if it is determined either has occurred in the student handbook and code of conduct and develop a code of conduct for teachers. | | |
| **Required Elements of Progress Report(s):**  Update the student handbook and code of conduct on the school's website to contain: 1) procedures for the discipline of students with disabilities (see SE 46), students with Section 504 Accommodation Plans and students not yet determined eligible for special education; 2) procedures assuring due process in disciplinary proceedings (see CR 10C); 3) procedures for accepting, investigating and resolving complaints alleging discrimination or harassment and the disciplinary measures that the school may impose if it is determined either has occurred by March 28, 2018.  Submit a copy of the code of conduct developed for teachers by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018  05/22/2018 | | |

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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:**  Document review indicated that the district's student handbook does not contain the relevant provisions of the Bullying Prevention and Intervention Plan (Plan) which addresses the bullying of students by a school staff member, and the district has not developed an employee handbook to contain relevant sections of the amended Plan relating to the duties of staff. | | |
| **Description of Corrective Action:**  The handbook does not contain the relevant provisions of the bullying and intervention plan by a staff member for the school. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  Handbook will address the bullying prevention and intervention plan by a staff member. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10B Bullying Intervention and Prevention | **Corrective Action Plan Status:** Partially Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:**  The district's description and evidence of completion of corrective action do not address developing an employee handbook to contain relevant sections of the amended Plan relating to the duties of staff. | | |
| **Department Order of Corrective Action:**  The district must develop an employee handbook that contains relevant sections of the amended Plan relating to the duties of staff. | | |
| **Required Elements of Progress Report(s):**  Update the student handbook on the school's website to contain the relevant provisions of the Bullying Prevention and Intervention Plan (Plan) which addresses the bullying of students by a school staff member by March 28, 2018.  Submit the section of the employee handbook that contains relevant sections of the amended Plan relating to the duties of staff by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018  05/22/2018 | | |

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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 the district's student discipline policies and procedures do not include the following required content:  the procedures for emergency removal do not address that the principal may not remove a student from school on an emergency basis for a disciplinary offense until adequate provisions have been made for the student's safety and transportation;  the procedures for in-school suspension do not address the principal's use of in-school suspension as an alternative to a short-term suspension; or  the procedures for a superintendent hearing do not address the timeliness of the student's or parent's notice of appeal and the superintendent's obligation to send written notice to the parent of the date, time and location of the hearing.  Also, the district has not developed a School-wide Education Service Plan. | | |
| **Description of Corrective Action:**  Policy and Procedure for removal of student from school will be revised in order to be compliant and will develop a school wide education service plan. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  Handbook revised and School Wide Service Plan created. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10C Student Discipline | **Corrective Action Plan Status:** Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit the student discipline policies and procedures developed by the district that include the following required content: 1) the procedures for emergency removal address that the principal may not remove a student from school on an emergency basis for a disciplinary offense until adequate provisions have been made for the student's safety and transportation; 2) the procedures for in-school suspension address the principal's use of in-school suspension as an alternative to a short-term suspension; and 3) the procedures for a superintendent hearing address the timeliness of the student's or parent's notice of appeal and the superintendent's obligation to send written notice to the parent of the date, time and location of the hearing by March 28, 2018.  Submit a copy of the district's School-wide Education Service Plan by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018  05/22/2018 | | |

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

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| **Criterion & Topic:**  CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Document review indicated that the district's annual and continuous notification concerning nondiscrimination and coordinators does not include the office address and phone number of the person designated to coordinate compliance under Section 504. | | |
| **Description of Corrective Action:**  The districts annual notification concerning nondiscrimination and coordinators does not include the office address and phone numbers of the designated to coordinate the compliance under Section 504. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  The districts will send out an annual notification concerning nondiscrimination and coordinators and publish in the handbook the office address and phone numbers of the designated to coordinate the compliance under Section 504. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **Corrective Action Plan Status:** Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Update the student handbook on the school's website to include the office address and phone number of the person designated to coordinate compliance under Section 504 by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018 | | |

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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:**  Partially Implemented |
| **Department CPR Findings:**  Document review and interviews indicated that the district has developed a written restraint prevention and behavior support policy; however, it has not developed procedures for the implementation of this policy. These written restraint prevention and behavior support procedures must include:  methods for preventing student violence, self-injurious behavior and suicide;  methods for engaging parents in discussions about restraint prevention and use;  alternatives to physical restraint and the methods of physical restraint used 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 school's training requirements, reporting requirements, and follow-up procedures;  a procedure for receiving and investigating complaints;  a procedure for implementing reporting requirements;  a procedure for making both oral and written notice to the parent; and  a procedure for the use of time-out. | | |
| **Description of Corrective Action:**  Did not develop procedure for the implementation of restraint prevention and behavior support policy. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  Update handbook and revise policy and procedures, and review during a faculty meeting who is trained annually in the building. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz | | |
| 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:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit the written restraint prevention and behavior support procedures developed by the district that include: 1) methods for preventing student violence, self-injurious behavior and suicide; 2) methods for engaging parents in discussions about restraint prevention and use; 3) alternatives to physical restraint and the methods of physical restraint used in emergency situations; 4) 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; 5) a description of the school's training requirements, reporting requirements, and follow-up procedures; 6) a procedure for receiving and investigating complaints; 7) a procedure for implementing reporting requirements; 8) a procedure for making both oral and written notice to the parent; and 9) a procedure for the use of time-out by March 28, 2018.  Submit evidence of training (dated attendance list with staff signature/role) provided to all staff on the revised restraint prevention and behavior support procedures by May 22, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018 | | |

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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:**  Document review indicated that the district's employment vacancies and job postings do not contain a statement of non-discrimination that includes the protected category of gender identity. | | |
| **Description of Corrective Action:**  We are part of Hampshire Regional School District and will include the statement of non-discrimination that includes the protected category of gender identity. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz | | **Expected Date of Completion:**  05/25/2018 |
| **Evidence of Completion of the Corrective Action:**  Job posting with required elements. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz  Lisa Ouellet | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 18A School district employment practices | **Corrective Action Plan Status:** Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit copies of the district's employment vacancies and job postings that contain a statement of non-discrimination that includes the protected category of gender identity by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018 | | |

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

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| **Criterion & Topic:**  CR 20 Staff training on confidentiality of student records | | **CPR Rating:**  Not Implemented |
| **Department CPR Findings:**  Document review and interviews indicated that the district does not train staff on the provisions of the Family Educational Rights and Privacy Act (FERPA) and on the importance of information privacy and confidentiality. | | |
| **Description of Corrective Action:**  We did not show staff trainings on students confidentiality. | | |
| **Title/Role(s) of Responsible Persons:**  Emily Lak | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  We will present staff agenda's and emails to support staff training for this topic. | | |
| **Description of Internal Monitoring Procedures:**  Emily Lak | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 20 Staff training on confidentiality of student records | **Corrective Action Plan Status:** Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit evidence of training (agenda, materials used and signed/dated attendance list with staff signature) provided to all staff on the provisions of the Family Educational Rights and Privacy Act (FERPA) and on the importance of information privacy and confidentiality by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018 | | |

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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:**  Not Implemented |
| **Department CPR Findings:**  Document review and interviews indicated that the district does not train staff annually regarding civil rights responsibilities, including the prevention of discrimination and harassment on the basis of students' race, color, sex, gender identity, religion, national origin and sexual orientation and the appropriate methods for responding to discrimination in the school setting. | | |
| **Description of Corrective Action:**  We did not comply with the uploaded documents for the civil rights training. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  We will provide an agenda and sign in sheet as proof of civil rights training. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 21 Staff training regarding civil rights responsibilities | **Corrective Action Plan Status:** Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit evidence of training (agenda, materials used and signed/dated attendance list with staff signature) provided to all staff on civil rights responsibilities, including the prevention of discrimination and harassment on the basis of students' race, color, sex, gender identity, religion, national origin and sexual orientation and the appropriate methods for responding to discrimination in the school setting by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018  05/22/2018 | | |

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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 does not 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:**  We did not show proof of self-evaluation. | | |
| **Title/Role(s) of Responsible Persons:**  Gretchen Morse-Dobosz | | **Expected Date of Completion:**  03/02/2018 |
| **Evidence of Completion of the Corrective Action:**  Notices of invite for principal coffee, survey monkey sent to families, and agenda for professional development addressing the "unpacking" what inclusion looks like for our school. | | |
| **Description of Internal Monitoring Procedures:**  Gretchen Morse-Dobosz | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 25 Institutional self-evaluation | **Corrective Action Plan Status:** Approved  **Status Date:** 02/01/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Submit a copy of the district's institutional self-evaluation including the tools utilized, conclusions reached, and resolution of any identified issues 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 by March 28, 2018. | | |
| **Progress Report Due Date(s):**  03/28/2018 | | |