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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: Boston Preparatory Charter Public (District)

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 01/09/2018.

**Mandatory One-Year Compliance Date:** **01/09/2019**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 3 | Special requirements for determination of specific learning disability | Partially Implemented |
| SE 20 | Least restrictive program selected | Partially Implemented |
| SE 40 | Instructional grouping requirements for students aged five and older | Partially Implemented |
| SE 51 | Appropriate special education teacher licensure | Partially Implemented |
| CR 7B | Structured learning time | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 12A | Annual and continuous notification concerning nondiscrimination and coordinators | 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 |
| ELE 14 | Licensure Requirements | Partially Implemented |

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| **Criterion & Topic:**  SE 3 Special requirements for determination of specific learning disability | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of student records indicated that when a student suspected of having a specific learning disability is evaluated, the IEP Team does not consistently create a written determination as to whether or not he or she has a specific learning disability. In instances when a written determination has been created, not all Team members consistently sign or, if there is disagreement as to the determination, Team members do not document their disagreement. | | |
| **Description of Corrective Action:**  The district has determined that the root cause of this deficiency is the lack of thorough training of Special Education Staff.  1. Full Special Education team SLD training.  2. Training for all Team Chairs to ensure proper proper written documentation at IEP mtgs when a student is suspected of SLD.  3. Review files of students suspected of SLD to guarantee full documentation. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Support Services | | **Expected Date of Completion:**  12/01/2018 |
| **Evidence of Completion of the Corrective Action:**  1. Attendance Sheet, Copy of Training Materials  2. Attendance Sheet, Copy of Training Materials  3. Results of Quarterly Audit | | |
| **Description of Internal Monitoring Procedures:**  1. Before each IEP meeting, the Director of Support Services will review with Team Chair all necessary documentation in preparation of IEPs when suspected of SLD.  2. Before each IEP meeting, the Director of Support Services will review with Team Chair all necessary documentation in preparation of IEPs when suspected of SLD.  3. Boston Prep will have quarterly internal file audits to ensure this practice is happening consistently. The Director of Support Services will oversee these quarterly audits. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 3 Special requirements for determination of specific learning disability | **Corrective Action Plan Status:** Approved  **Status Date:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By March 30, 2018, submit evidence of training for Team chairs on procedures for developing written determinations for students suspected of having specific learning disabilities. Include the agenda, training materials, signed attendance sheets with name and role of participants, and name and role of presenter.  By September 14, 2018 submit the results of an internal review of approximately 10 students with SLD determinations subsequent to implementation of all corrective actions. Provide a detailed narrative summary of the review including the number of records reviewed and the number for which a written SLD determination was appropriately completed, including the signature of all IEP team members. If non-compliance is identified, report the specific actions taken to correct each individual student record, identify and report the root cause(s) of the ongoing non-compliance and a plan to remedy it.  \*Please note that when 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 record review; b) Date of the review; c) Name of person(s) who conducted the review, their roles(s), and their signature(s). | | |
| **Progress Report Due Date(s):**  03/30/2018  09/14/2018 | | |

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| **Criterion & Topic:**  SE 20 Least restrictive program selected | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of student records indicated that IEP Teams do not consistently state why removal from the general education classroom is considered critical to the student's program and the basis for its conclusion that education in the least restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily. | | |
| **Description of Corrective Action:**  The district has determined that the root cause of this deficiency is the lack of thorough training of Special Education Staff.  1. IEP Writing Workshop for all Special Educators  2. IEP Compliance Workshop for Team Chairs  3. Review files of students who are removed from the general education classroom to guarantee full documentation. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Support Services | | **Expected Date of Completion:**  12/01/2018 |
| **Evidence of Completion of the Corrective Action:**  1. Attendance Sheet, Copy of Training Materials  2. Attendance Sheet, Copy of Training Materials  3. Results of Quarterly Audit | | |
| **Description of Internal Monitoring Procedures:**  "1. Department will have quarterly internal review of student records to ensure least restrictive environment is clearly stated and individualized to student case.  "  2. Director of Support Services and Team Chairs will review drafts of all IEPs.  3. Boston Prep will have quarterly internal file audits to ensure this practice is happening consistently. The Director of Special Education will oversee these quarterly audits. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 20 Least restrictive program selected | **Corrective Action Plan Status:** Approved  **Status Date:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By March 30, 2018, submit evidence of training for Team chairs on procedures for developing non-participation justifications statements that are individualized and address why the removal from general education is necessary and beneficial to the student. Include the agenda, training materials, signed attendance sheets with name and role of participants, and name and role of presenter.  By September 14, 2018 submit the results of an internal review of approximately 10 students with IEP development subsequent to implementation of all corrective actions. Provide a detailed narrative summary of the review including the number of records reviewed and the number for which non-participation justification statements are individualized and clearly address why removal from general education is necessary and beneficial to the student. If non-compliance is identified, report the specific actions taken to correct each individual student record, identify and report the root cause(s) of the ongoing non-compliance and a plan to remedy it. Please provide examples of the non-participation statements reviewed by the school.  \*Please note that when 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 record review; b) Date of the review; c) Name of person(s) who conducted the review, their roles(s), and their signature(s). | | |
| **Progress Report Due Date(s):**  03/30/2018  09/14/2018 | | |

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| **Criterion & Topic:**  SE 40 Instructional grouping requirements for students aged five and older | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that for students placed in instructional groupings outside of the general education classroom for 60% or less of the students' schedule, two sections of the Transitions class exceed required student to staff ratios of eight students to one special educator. Specifically, the Transitions class includes 12 students to one special educator on Wednesdays and 11 students to one special educator on Fridays. | | |
| **Description of Corrective Action:**  Redistribute rosters to balance class size to ensure that all Transitions classes do not exceed required student to staff ratios of eight students to one special educator. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Support Services | | **Expected Date of Completion:**  09/01/2018 |
| **Evidence of Completion of the Corrective Action:**  Updated Class Roster | | |
| **Description of Internal Monitoring Procedures:**  The Director of Support Services will verify rosters to ensure appropriate class size at the start of each semester. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 40 Instructional grouping requirements for students aged five and older | **Corrective Action Plan Status:** Approved  **Status Date:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Please note that after the school year has begun, if instructional groups have reached maximum size, the district may decide to increase the size of an instructional grouping by no more than two additional students if the additional students have compatible instructional needs. The district is required to send notice to parents to notify them of increased instructional group size. See http://www.doe.mass.edu/sped/28MR/ for mandated form 28M/1.  By March 30, 2018 submit an updated Special Education Instructional Grouping and Age Span document, which can be found in the WBMS Document Library, for all sections of the Transitions class including an increased instructional group size waiver if applicable.  By May 25, 2018 submit the results of the Director of Support Services' review of class rosters for Q4 to ensure that special education instructional groupings do not exceed 8 students to one special educator per instructional grouping. | | |
| **Progress Report Due Date(s):**  03/30/2018  05/25/2018 | | |

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| **Criterion & Topic:**  SE 51 Appropriate special education teacher licensure | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of licenses, student records and documents demonstrated that not all staff who design and/or provide direct special education services described in IEPs are appropriately licensed or qualified. Specifically, students with disabilities receive specialized instruction from four staff members who have neither undergraduate or graduate degrees from an approved special education program, licenses in special education or are supervised by a qualified individual. | | |
| **Description of Corrective Action:**  1. Boston Prep will uploaded confirmation of two new staff members as having completed a graduation program of special education and/or having an out of state special education license.  2. All returning staff members teaching students with disabilities for the 2018-2019 school year will be appropriately licensed. All new staff members will be appropriately licensed, hold the appropriate degree, or have an out state special education license. | | |
| **Title/Role(s) of Responsible Persons:**  1. Director of Human Capital  2. Director of Support Services | | **Expected Date of Completion:**  09/01/2018 |
| **Evidence of Completion of the Corrective Action:**  1. Upload the new staff credentials.  2. Upload special education staff roster and documentation of qualifications. | | |
| **Description of Internal Monitoring Procedures:**  Boston Prep's Director of Human Capital will monitor all staff in special education roles to ensure that they are licensed in the appropriate areas. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 51 Appropriate special education teacher licensure | **Corrective Action Plan Status:** Approved  **Status Date:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By March 30, 2018 submit either a copy of the college transcripts or the out-of-state licenses for Daniel Calderon and Ryan Rondorf.  By March 30, 2018 submit the special education staff roster and documentation of qualifications for special education staff, including Jeffrey Angelico and Ashley Johnson.  By September 14, 2018 submit the special education staff roster and documentation for all returning and new staff members teaching students with disabilities for the 2018-2019 school year, including license number, degree, out-of-state license, and/or schedule of supervision by an appropriately licensed qualified individual. | | |
| **Progress Report Due Date(s):**  03/30/2018  05/25/2018  09/14/2018 | | |

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| **Criterion & Topic:**  CR 7B Structured learning time | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that physical education is not offered to students in grades 11 and 12. | | |
| **Description of Corrective Action:**  1. Boston Prep will hire an additional PE teacher in order to offer PE to all students, grades 6-12.  2. Boston Prep will adjust the master schedule in order to offer PE to all students, grades 6-12. | | |
| **Title/Role(s) of Responsible Persons:**  1. Director of Human Capital  2. Executive Director | | **Expected Date of Completion:**  09/01/2018 |
| **Evidence of Completion of the Corrective Action:**  Upload Master Schedule SY 2018-19 | | |
| **Description of Internal Monitoring Procedures:**  The Executive Director will verify that all students receive PE instruction by reviewing the master schedule annually. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 7B Structured learning time | **Corrective Action Plan Status:** Approved  **Status Date:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By September 14, 2018 submit the following:  1. A description of how the district remedied the non-compliance;  2. A revised HS course of study or course descriptions for each HS grade level;  3. A signed district-wide Student Learning Time Worksheet (see Document Library) from the Head of School affirming all issues have been resolved;  4. A signed HS Student Learning Time Worksheet (see Document Library) from the HS principal affirming that HS students 9-12 receive PE or Health; and  5. A sample of 11th & 12th grade student schedules demonstrating PE or Health in the students' schedules. | | |
| **Progress Report Due Date(s):**  09/14/2018 | | |

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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 student code of conduct does not contain disciplinary procedures for students with disabilities and 504 Accommodation Plans. Specifically, the code of conduct states that a copy of procedural rights and protections relating to the discipline of such students may be obtained from the principal. | | |
| **Description of Corrective Action:**  The Student Handbook has already been updated to include disciplinary procedures for students with disabilities and 504 Accommodation Plans. | | |
| **Title/Role(s) of Responsible Persons:**  Executive Director | | **Expected Date of Completion:**  03/01/2018 |
| **Evidence of Completion of the Corrective Action:**  Upload revised Student Handbook, relevant sections. | | |
| **Description of Internal Monitoring Procedures:**  The Executive Director will verify that the Student Handbook contains this procedure by evaluating the handbook annually. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Approved  **Status Date:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By March 30, 2018 submit a webpage link to the current student code of conduct to ensure the document contains appropriate disciplinary procedures for students with disabilities and 504 Accommodation Plans. | | |
| **Progress Report Due Date(s):**  03/30/2018 | | |

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| **Criterion & Topic:**  CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that the charter school's annual and continuous notification to applicants, students, parents, and employees does not include the name(s), office address(es) and phone number(s) of the coordinator(s) for compliance with its responsibilities under Title IX and Section 504. In addition, the charter school's enrollment brochure does not include a notice stating that the charter school does not discriminate on the basis of race, color, national origin, sex, gender identity, disability, religion, or sexual orientation. Although the website page where the brochure is posted has a non-discrimination statement, this statement does not address color, gender identity, religion, or sex as protected categories. | | |
| **Description of Corrective Action:**  1. The Student Handbook has been updated with the name, address, and phone number of the coordinator for compliance under Title IX and Section 504.  2. The Faculty Handbook has been updated with the name, address, and phone number of the coordinator for compliance under Title IX and Section 504.  3. The enrollment brochure non-discrimination statement has been updated to address color, gender identity, sex, and religion as protected categories. The enrollment section of the website has been updated with the same info.  4. The enrollment brochure will be updated to include the name, address, and phone number of the coordinator for compliance under Title IX and Section 504. | | |
| **Title/Role(s) of Responsible Persons:**  Executive Director | | **Expected Date of Completion:**  03/01/2018 |
| **Evidence of Completion of the Corrective Action:**  1. Upload the updated Student Handbook, relevant sections.  2. Upload the updated Faculty Handbook, relevant sections.  3. Upload the updated enrollment brochure.  4. Upload the updated enrollment brochure. | | |
| **Description of Internal Monitoring Procedures:**  1. The Executive Director will verify that the Student Handbook contains this information by evaluating the handbook annually.  2. The Executive Director will verify that the Faculty Handbook contains this information by evaluating the handbook annually.  3. The Executive Director will verify that the enrollment brochure contains this information by evaluating the brochure annually.  4. The Executive Director will verify that the enrollment brochure contains this information by evaluating the brochure annually. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **Corrective Action Plan Status:** Approved  **Status Date:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By March 30, 2018 submit a link to the current Student Handbook and faculty handbook, updated with the name, address, and phone number of the coordinator for compliance under Title IX and Section 504.  By March 30, 2018, submit a website page link to the charter school's enrollment brochure to ensure that a notice stating that the charter school does not discriminate on the basis of race, color, national origin, sex, gender identity, disability, religion, or sexual orientation is included and to ensure the webpage's non-discrimination statement addresses all protected categories, including color, gender identity, religion, or sex. | | |
| **Progress Report Due Date(s):**  03/30/2018 | | |

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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:**  A review of documents indicated that although the charter school has developed a written notice for students 16 and over leaving school without a high school diploma, certificate of attainment, or certificate of completion, and their parents, this notice is not sent within five days of the student's tenth consecutive absence. | | |
| **Description of Corrective Action:**  The Absence Letter has been updated to include the correct number of days. | | |
| **Title/Role(s) of Responsible Persons:**  High School Principal | | **Expected Date of Completion:**  03/01/2018 |
| **Evidence of Completion of the Corrective Action:**  Upload the updated Absence Letter. | | |
| **Description of Internal Monitoring Procedures:**  The High School Principal will review this letter annually at the start of the school year to ensure compliance. | | |
| 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:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By March 30, 2018 submit the proposed notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion within 5 days from the student's tenth consecutive absence to the student and the parent/guardian of the student to discuss reasons the student is leaving school, offering at least two dates and times for an exit interview between the head of school (or designee) and the student and parent/guardian to occur prior to the student permanently leaving school.  By May 25, 2018, once the letter has been approved, the district will submit evidence of training to relevant staff members responsible for the mailing of Notice to students 16 or over leaving school and their parent/guardian, including an agenda and signed attendance sheets that include name & role of attendee.  By September 14, 2018 submit a review of records of students 16 or over and with ten days of consecutive absences from previous school year for evidence that the student and parent were sent a notice to discuss reasons the student is leaving school, offering at least two dates and times for an exit interview between the superintendent (or designee) and the student and parent/guardian. Provide a detailed summary of the internal review including the number of records reviewed, and the number with evidence of a notice sent to the student and parent inviting them to an exit interview. If non-compliance is identified, report the specific actions taken to correct it and report the root cause(s) of the ongoing non-compliance as well as a plan to remedy it.  \*Please note that when 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 record review; b) Date of the review; c) Name of person(s) who conducted the review, their roles(s), and their signature(s). | | |
| **Progress Report Due Date(s):**  03/30/2018  05/25/2018  09/14/2018 | | |

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| **Criterion & Topic:**  ELE 14 Licensure Requirements | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and licensure information in ELAR indicated that not all of the ESL teachers who provide students with ESL instruction hold an ESL license or a current waiver issued by the Massachusetts Department of Elementary and Secondary Education. | | |
| **Description of Corrective Action:**  Boston Prep will upload confirmation of all current ESL teachers' ESL licensure. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Human Capital | | **Expected Date of Completion:**  03/01/2018 |
| **Evidence of Completion of the Corrective Action:**  Upload staff roster and licensure information. | | |
| **Description of Internal Monitoring Procedures:**  Boston Prep's Director of Human Capital will monitor all staff in ESL roles to ensure that they are licensed in the appropriate areas. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  ELE 14 Licensure Requirements | **Corrective Action Plan Status:** Approved  **Status Date:** 02/20/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By March 30, 2018, provide information on the support the district will provide to help the uncertified educator(s) earn the appropriate licensure and a timeline that shows the educator(s)'s efforts towards earning his/her ESL license.  By March 30, 2018, provide a report of the program director's monitoring of the educator's progress toward certification throughout 2017-2018 school year until licensure is secured, and a copy of any job posting and application information that may remain on file in the event the currently uncertified educator(s) fails to acquire proper certification by Summer 2018.  By September 14, 2018, provide evidence of the licensure of the current ESL teacher(s) by the progress report. | | |
| **Progress Report Due Date(s):**  03/30/2018 | | |