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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: Lawrence Family Development Charter (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 04/24/2018.

**Mandatory One-Year Compliance Date:** **04/24/2019**

**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 |
| SE 56 | Special education programs and services are evaluated | Partially Implemented |
| CR 10B | Bullying Intervention and Prevention | Partially Implemented |
| CR 10C | Student Discipline | Partially Implemented |
| CR 11A | Designation of coordinator(s); grievance procedures | 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 |

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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:**  A review of documents and staff interviews indicated that the charter school does not have policies and procedures for placing students in interim alternative educational settings (IAES). | | |
| **Description of Corrective Action:**  The Student Parent Handbook for SY19, section Discipline of Special Education Students Policy will be updated to include a procedure if the conduct for which the student is being disciplined involves the special circumstances of weapons, illegal drugs, controlled substances, or serious bodily injury. The Special Education Process and Procedure Manual Rev.4. will be updated as well. The draft of the proposed edits are detailed described in the upload, filename SE46 IAS parent student handbook FY19. | | |
| **Title/Role(s) of Responsible Persons:**  Janis Brodeur M.Ed.  Special Education Director | | **Expected Date of Completion:**  10/31/2018 |
| **Evidence of Completion of the Corrective Action:**  1. Once approved by the LFDCS Board of Directors, the final version of Updated Student/Parent handbook Special Education Students Policy and pages will be scanned and submitted in Progress Report 1.  2. The LFDCS Board of Trustees Meeting Agenda will be submitted noting a vote to accept the proposed changes.  3. During August 2018 in-service training, the updated special education policy will be reviewed by staff. A PowerPoint and in-service agenda will be submitted with the October progress reporting as evidence.  SE46 IAS parent student handbook  10. SPECIAL CIRCUMSTANCES  If the conduct for which the student is being disciplined involves the special circumstances of weapons, illegal drugs, controlled substances, or serious bodily injury, school personnel may remove the student to an interim alternative educational setting (IAES) for up to 45 school days, regardless of the manifestation determination. 34 CFR § 300.530(g). Special circumstances exist if the student: carries a weapon to or possesses a weapon at school, on school premises, or to or at a school function under the jurisdiction of a State or local educational agency (district); or ? knowingly possesses or uses illegal drugs, or sells or solicits the sale of a controlled substance, while at school, on school premises, or at a school function under the jurisdiction of a State or local educational agency; or inflicts serious bodily injury upon another person while at school, on school premises, or at a school function under the jurisdiction of a State or local educational agency. 34 CFR § 300.530(g). Serious bodily injury as defined in 18 U.S.C. § 930, a bodily injury that involves a substantial risk of death, extreme physical pain, protracted and obvious disfigurement, or protracted loss or impairment of the function of a bodily member, organ, or mental faculty. 34 CFR § 300.530(i)(3).  Interim Alternative Educational Setting  An Interim Alternative Educational Setting (IAES) as described in this section must be a setting in which a student would:  1. Continue progress in the general curriculum  2. Continue to receive services/modifications included in the current IEP, and  3. Include services/modifications designed to address behavior as a part of a Behavior Intervention Plan, (BIP)  An Interim Alternative Educational Setting allows student to continue to receive IEP services, provides services to ensure behavior does not recur, and enables the student to show progress in the general curriculum.  When the school recommends an IAES due to dangerous weapons or drugs, the IEP Team would determine the IAES and all procedural safeguards apply.  The school’s request must meet the following criteria to establish that the student is dangerous:  1. There is substantial evidence that maintaining the current placement is likely to result in injury to the student or others.  2. Reasonable steps have been to minimize likelihood of harm, including the use of supplementary aids and services.  3. The student’s Current IEP is appropriate.    When the IAES is recommended, the IEP team must meet within 10 business days of this decision.  The purpose of this meeting would be to conduct a Functional Behavior Assessment, (FBA), if one has not already been done. A BIP would need to be developed and implemented as soon as practicable after this meeting. If a student already has a BIP, the purpose of this meeting would be to review and modify the plan as appropriate. In addition, the IEP team must meet within 10 school days of the decision to conduct a manifestation determination. | | |
| **Description of Internal Monitoring Procedures:**  LFDCS Policies and Procedures regarding special education students will be reviewed twice yearly by the Special Education Director to ensure policies and procedures are compliant with IDEA 2004 and 603 CMR 28.00, 18.00, 23.00, and 46.00. | | |
| 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:** 05/31/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By October 5, 2018, submit a copy of the relevant pages from the revised parent-student handbook demonstrating that the charter school has put in place policies and procedures for placing students in interim alternative educational settings (IAES) when necessary.  By October 5, 2018, provide evidence (agenda, attendance sheet with signature/role, training materials) that staff responsible for making placement determinations have received training on the new policies and procedures. | | |
| **Progress Report Due Date(s):**  10/05/2018  12/14/2018  01/25/2019 | | |

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| **Criterion & Topic:**  SE 56 Special education programs and services are evaluated | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Although interviews indicated that staff members informally analyze outcome data to assess student progress and make individualized programmatic changes as a result, a review of documents indicated that the charter school does not regularly evaluate its special education programs and services. | | |
| **Description of Corrective Action:**  The Special Education Program Self-Evaluation FY 19 will include a sub-group analysis of student performance as measured by Measures of Academic Performance, (MAP), MCAS scores, IEP goal achievement and report card grades. Data will be analyzed by the Special Education Team and specific recommendations and program changes will be made for students who have not reached developmentally appropriate benchmarks and milestones in the general curriculum. | | |
| **Title/Role(s) of Responsible Persons:**  Janis Brodeur M.Ed.  Special Education Director | | **Expected Date of Completion:**  10/31/2018 |
| **Evidence of Completion of the Corrective Action:**  1. Individualized student data by grade level and disability category will be included in the Special Education Program Self-Evaluation FY 19  2. Student data will include MCAS performance data, IEP Goal Achievement, Report card grades, ESL status.  3. The Special Education Program Self-Evaluation FY 19 will be submitted with the October progress reporting.  4. Special Education Team Meeting Agendas will be submitted with the October progress reporting. | | |
| **Description of Internal Monitoring Procedures:**  Individualized student data and progress towards goals will be reviewed quarterly at the 1st Special Education Team Meeting following each quarterly report card date. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 56 Special education programs and services are evaluated | **Corrective Action Plan Status:** Partially Approved  **Status Date:** 05/31/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:**  Special education program evaluations aid charter schools in identifying areas of strength and opportunities for improvement and further development of the school's special education program as a whole, rather than identifying areas of remedy for specific students. Therefore, student achievement data should be used to assess group-level performance (e.g., by grade level, by disability type, by placement type, etc.). In addition the program evaluation should assess program-level data such as rates of identification, gaps in services, student retention, etc. As an example, please see the English Learner Education evaluation plan template at http://www.doe.mass.edu/ell/resources.html. This document lays out the development of an evaluation team, along with specific targets to assess. Lastly, the "high level" nature of this evaluation means that conducting such a review on an annual basis is more feasible for the charter school. | | |
| **Department Order of Corrective Action:**  Develop a comprehensive, system-wide evaluation plan of LFDCS's special education programs and services to ensure the effectiveness of its overall special education program and to ensure that there are no gaps in the special education program at the charter school. | | |
| **Required Elements of Progress Report(s):**  By October 5, 2018 submit a detailed narrative of the district's proposed evaluation plan, including a timeline for the activities, the staff responsible, and data gathering methods.  By December 14, 2018, submit a summary of the special education program evaluation results and data and an action plan for any recommendations for programmatic improvements based on those results. | | |
| **Progress Report Due Date(s):**  10/05/2018  01/25/2019 | | |

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| **Criterion & Topic:**  CR 10B Bullying Intervention and Prevention | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicated that the charter school publishes its local Bullying Prevention and Intervention Plan (Plan) in the faculty and student/family handbooks. However, the Plan has not been updated consistent with the amendments to the Massachusetts anti-bullying law to extend protections to students who are bullied by a member of the school staff, which includes, but is not limited to, an educator, administrator, school nurse, cafeteria worker, custodian, bus driver, athletic coach, advisor to an extracurricular activity or paraprofessional. | | |
| **Description of Corrective Action:**  Intended Parent Student Handbook change for August 2018 page 42  Bullying Prevention and Intervention Policy  A. Definitions  will be changed to  Aggressor: A person who engages in bullying, cyberbullying, or retaliation.  This may include: a student, teacher, administrator, school nurse, cafeteria worker, custodian, bus/van driver, coach, after -school worker, or paraprofessional. | | |
| **Title/Role(s) of Responsible Persons:**  Principal Susan Dion Earabino, Ed.D. | | **Expected Date of Completion:**  10/31/2018 |
| **Evidence of Completion of the Corrective Action:**  Parent Student Handbook change for August 2018 page 42 | | |
| **Description of Internal Monitoring Procedures:**  Annual review cycle of the Parent Student Handbook for compliance | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10B Bullying Intervention and Prevention | **Corrective Action Plan Status:** Approved  **Status Date:** 05/31/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By October 5, 2018 submit a copy of the formally adopted Bullying Intervention and Prevention Plan for LFDCS.  The school may provide a direct link to the Plan on the charter school's web site.  By October 5, 2018, submit evidence of training for all staff on the revised Plan. Include the agenda, signed attendance sheet, name and role of presenter, and training materials. | | |
| **Progress Report Due Date(s):**  10/05/2018  12/14/2018 | | |

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| **Criterion & Topic:**  CR 10C Student Discipline | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicated that the charter school does not have a system for periodic review of discipline data by special populations. | | |
| **Description of Corrective Action:**  The district will use disaggregated and aggregated attendance data from its new student information system Rediker, notes from Heads of School and relevant teachers, and Upper School “blue slips” to formally review discipline data of special populations comparative to other students. | | |
| **Title/Role(s) of Responsible Persons:**  Principal Susan Dion Earabino, Ed.D. | | **Expected Date of Completion:**  10/31/2018 |
| **Evidence of Completion of the Corrective Action:**  The information will be shared with the Superintendent of School in written report form. | | |
| **Description of Internal Monitoring Procedures:**  This will be done: quarterly by Heads of School, Director of Special Education, and Principal; and  every 6 weeks as part of the Response to Intervention (RtI) meetings. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10C Student Discipline | **Corrective Action Plan Status:** Approved  **Status Date:** 05/31/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By October 5, 2018, submit a description of the system for periodic review of discipline data by principals to address the impact of disciplinary action on selected student populations and modify disciplinary practices as needed. See Department guidance under section VIII, Data Collection and Reporting (603 CMR 53.14), at http://www.doe.mass.edu/lawsregs/advisory/discipline/StudentDiscipline.html.  By December 14, 2018, submit a narrative on the impact of the school's suspensions based on an analysis of the discipline data for selected populations and the alternatives to suspensions the district will consider to address any disproportionality evident in the data. | | |
| **Progress Report Due Date(s):**  10/05/2018  12/14/2018 | | |

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| **Criterion & Topic:**  CR 11A Designation of coordinator(s); grievance procedures | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicated that although the charter school has designated a coordinator to address complaints from students and employees alleging discrimination based on sex or disability, procedures for filing a grievance are not included in the student/family and faculty handbooks or on the charter school's website. | | |
| **Description of Corrective Action:**  Grievance procedures for the Parent/Student Handbook, Employee Manual, and the website will be written and approved by relative teams/boards. They will be clear and consistent. | | |
| **Title/Role(s) of Responsible Persons:**  Principal Susan Dion Earabino, Ed.D. | | **Expected Date of Completion:**  10/31/2018 |
| **Evidence of Completion of the Corrective Action:**  Pages and references from the Parent/Student Handbook, Employee Manual and the website. | | |
| **Description of Internal Monitoring Procedures:**  Annual review cycle of Parent Student Handbook, Employee Manual, and the website for compliance. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 11A Designation of coordinator(s); grievance procedures | **Corrective Action Plan Status:** Approved  **Status Date:** 05/31/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By October 5, 2018, submit a copy of the relevant pages from the revised parent-student handbook, employee manuals, and school website demonstrating that procedures for filing a grievance are included.  By October 5, 2018, provide evidence (agenda, attendance sheet with signature/role, training materials) that staff have received training on the new policies and procedures. | | |
| **Progress Report Due Date(s):**  10/05/2018  12/14/2018 | | |

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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. | | |
| **Description of Corrective Action:**  The following information will be added to the Parent/Student Handbook and Employee Manual as the contact person including the name, office address, and phone number of the coordinator for compliance with its responsibilities under Title IX and Section 504  Susan Dion Earabino, Ed.D.  400 Haverhill St.  Lawrence, MA 01841  978-738-0609 | | |
| **Title/Role(s) of Responsible Persons:**  Principal Susan Dion Earabino, Ed.D. | | **Expected Date of Completion:**  10/31/2018 |
| **Evidence of Completion of the Corrective Action:**  Pages from the Parent/Student Handbook and Employee Manual | | |
| **Description of Internal Monitoring Procedures:**  Annual review of the Parent/Student Handbook and Employee Manual for compliance | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **Corrective Action Plan Status:** Approved  **Status Date:** 05/31/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By October 5, 2018, submit a copy of the relevant pages from the revised parent-student handbook and employee manuals demonstrating that the charter school's annual and continuous notification to applicants, students, parents, and employees includes 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.  By October 5, 2018, provide evidence (agenda, attendance sheet with signature/role, training materials) that staff have received training on the new policies and procedures. | | |
| **Progress Report Due Date(s):**  10/05/2018  12/14/2018 | | |

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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 and staff interviews indicated that although the charter school has developed written restraint prevention and behavior support policy and procedures consistent with 603 CMR 46.00 regarding appropriate responses to student behavior that may require immediate intervention, the policy and procedures do not include a procedure for conducting periodic review of data and documentation on the program's use of restraint or a procedure for the use of time-out. | | |
| **Description of Corrective Action:**  Review of data and documentation on restraint prevention and behavior support policy and procedures consistent with 603 CMR 46.00 regarding appropriate responses to student behavior including the use of restraint or procedure for time-out will be formally reviewed: quarterly by Heads of School, Director of Special Education, and Principal; and every 6 weeks as part of the Response to Intervention (RtI) meetings. Written documentation on the use of restraint will continue to be shared with parents on the same day. | | |
| **Title/Role(s) of Responsible Persons:**  Principal Susan Dion Earabino, Ed.D. | | **Expected Date of Completion:**  10/31/2018 |
| **Evidence of Completion of the Corrective Action:**  The information will be shared with the Superintendent of School in written report form. | | |
| **Description of Internal Monitoring Procedures:**  Information will be monitored Quarterly by Heads of School, Director of Special Education, and Principal; and every 6 weeks as part of the Response to Intervention (RtI) meetings. | | |
| 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:** 05/31/2018  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By October 5, 2018, submit a description of the charter school's procedure for conducting periodic review of data and documentation on the program's use of restraint or a procedure for the use of time-out.  By December 14, 2018, submit a narrative on the impact of the school's use of physical restraint based on an analysis of data and documentation on the program's use of restraint or a procedure for the use of time-out. | | |
| **Progress Report Due Date(s):**  10/05/2018  12/14/2018  01/25/2019 | | |