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| **MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**  **Public School Monitoring** |

##### TIERED FOCUSED MONITORING REVIEW

## CORRECTIVE ACTION PLAN

Charter School or District: Greenfield

TFM Onsite Year: 2022-2023

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 Tiered Focused Monitoring Report dated 10/20/2023.

**Mandatory One-Year Compliance Date:** **10/20/2024**

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

| **Criterion** | **Criterion Title** | **FMR Rating** |
| --- | --- | --- |
| SE 9 | Timeline for determination of eligibility | Partially Implemented |
| SE 14 | Review and revision of IEPs | Partially Implemented |
| SE 20 | Least restrictive program selected | Partially Implemented |
| SE 34 | Continuum of alternative services and placements | Partially Implemented |

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| TIERED FOCUSED MONITORING REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  SE 9 Timeline for determination of eligibility | | **FMR Rating:**  Partially Implemented |
| **Department TFM Findings:**  A review of student records and staff interviews indicated that within 45 school-working days after receipt of the parent's written consent to an initial evaluation or re-evaluation, the district does not consistently determine whether the student is eligible for special education and provide to the parent either a proposed IEP and proposed placement or a written explanation of the finding of no eligibility. | | |
| **Description of Corrective Action:**  The district has determined a root cause of the district's failure to complete evaluations within timelines is the turnover of staff in roles related to the execution of these tasks, including Pupil Services administrative assistants, special educators, and special education administrators. Another root cause is the lack of coherent district-wide procedures in place across all district schools. The district has developed and will be implementing an updated handbook of district-wide procedures related to the receipt, documentation, assignment, scheduling, and completion of assessments and evaluations for initial and re-evaluation eligibility. This will support clarity of role responsibilities and expectations. The district has also implemented a professional development meeting schedule to support training of special education staff district-wide as well as evaluation team leaders that support early education, elementary, and Greenfield Middle School specifically. The office of Pupil Services is implementing a revised assessment tracking data system to account for and follow the progress of evaluations from receipt of signed consent to the generation of documentation following the summative team meeting (e.g. N-1, N-2). Training will be provided to Pupil Services clerical staff with relevant responsibilities, to evaluation team leaders, and special education administrators in the district. | | |
| **Title/Role(s) of Responsible Persons:**  David Messing, Director of Pupil Services | | **Expected Date of Completion:**  04/01/2024 |
| **Evidence of Completion of the Corrective Action:**  1. By 12/1/23 the district will submit the updated Greenfield Public Schools' Special Education Procedural Handbook.  2. By 1/1/24 the district will submit copies of signed attendance sheets, agendas, and training materials.  3. By 4/1/24 the district will submit a records review of 5 cases involving initial evaluation or triennial re-evaluation for compliance with 45-day timelines. | | |
| **Description of Internal Monitoring Procedures:**  1. Biweekly the Pupil Services Team including the Director of Pupil Services, Assistant Director of Pupil Services, Administrative Assistant for Pupil Services, and the district's three evaluation team leaders will review the assessment tracking data system for compliance.  2. For any noncompliance identified, the Director of Pupil Services and/or the Assistant Director of Pupil Services will meet with specific school personnel for purposes of retraining and professional development to ensure compliance. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 9 Timeline for determination of eligibility | **Corrective Action Plan Status:** Approved  **Status Date:** 12/06/2023  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By December 29, 2023, the district will submit district-wide procedures that detail roles and responsibilities of staff related to the receipt, documentation, assignment, scheduling, and completion of assessments and evaluations for initial and re-evaluation eligibility within required timelines.  By January 30, 2024, the district will submit evidence of training on the revised procedures to all special education staff. This training will also include use of an assessment tracking system to monitor the progress of evaluations from the date of receipt of signed consent. Evidence of training(s) will include the name and role of the trainer, training materials, signed attendance sheets, and date(s) of training.  By March 30, 2024, the district will submit a summary of the results of an internal review of five special education student records across all schools for evidence that initial evaluations and re-evaluations are completed, a Team meeting is held, and, for eligible students, the parent receives a proposed IEP and placement within 45 days of the district's receipt of the parent's signed consent for evaluation. For any noncompliance identified, the district will conduct a root cause analysis and implement appropriate corrective action. | | |
| **Progress Report Due Date(s):**  12/29/2023  01/30/2024  03/30/2024 | | |

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| TIERED FOCUSED MONITORING REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  SE 14 Review and revision of IEPs | | **FMR Rating:**  Partially Implemented |
| **Department TFM Findings:**  A review of student records and staff interviews indicated that, immediately following the development of the IEP, the district does not always provide the parents with the proposed IEP and proposed placement. | | |
| **Description of Corrective Action:**  The district has determined a root cause of the district's failure to provide caregivers with proposed IEPs and placements within timelines is the turnover of staff in roles related to the execution of these tasks, including Pupil Services administrative assistants, special educators, and special education administrators. Another root cause is the lack of coherent district-wide procedures in place across all district schools. The district has developed and will be implementing an updated handbook of district-wide procedures related to the receipt, documentation, assignment, scheduling, and completion of assessments and evaluations for initial and re-evaluation eligibility. This will support clarity of role responsibilities and expectations. The district has also implemented a professional development meeting schedule to support training of special education staff district-wide as well as evaluation team leaders that support early education, elementary, and Greenfield Middle School specifically. The office of Pupil Services is implementing a revised assessment tracking data system to account for and follow the progress of evaluations from receipt of signed consent to the generation of documentation following the summative team meeting (e.g. N-1, N-2). Training will be provided to Pupil Services clerical staff with relevant responsibilities, to evaluation team leaders, and special education administrators in the district. | | |
| **Title/Role(s) of Responsible Persons:**  David Messing, Director of Pupil Services | | **Expected Date of Completion:**  04/01/2024 |
| **Evidence of Completion of the Corrective Action:**  1. By 12/1/23 the district will submit the updated Greenfield Public Schools' Special Education Procedural Handbook.  2. By 1/1/24 the district will submit copies of signed attendance sheets, agendas, and training materials.  3. By 4/1/24 the district will submit a records review of 5 cases involving initial evaluation or triennial re-evaluation for compliance with 45-day timelines. | | |
| **Description of Internal Monitoring Procedures:**  1. Biweekly the Pupil Services Team including the Director of Pupil Services, Assistant Director of Pupil Services, Administrative Assistant for Pupil Services, and the district's three evaluation team leaders will review the assessment tracking data system for compliance.  2. For any noncompliance identified, the Director of Pupil Services and/or the Assistant Director of Pupil Services will meet with specific school personnel for purposes of retraining and professional development to ensure compliance. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 14 Review and revision of IEPs | **Corrective Action Plan Status:** Approved  **Status Date:** 12/06/2023  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By December 29, 2023, the district will submit revised procedures that detail roles and responsibilities of staff members to ensure that immediately following the development of the IEP, the district provides parents with the proposed IEP and proposed placement.  By January 30, 2024, the district will submit evidence of training on the revised procedures for all special education staff. This training will also include use of a tracking system to ensure that immediately following the development of the IEP, the district provides parents with the proposed IEP and proposed placement. Evidence of this training(s) will include the name and role of the trainer, training materials, signed attendance sheets, and date(s) of training.  By March 30, 2024, the district will submit a summary of the results of an internal review of five special education student records across all schools for evidence that the parent receives a proposed IEP and placement immediately following the Team meeting. For any noncompliance identified, the district will conduct a root cause analysis and implement appropriate corrective action. | | |
| **Progress Report Due Date(s):**  12/29/2023  01/30/2024  03/30/2024 | | |

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| TIERED FOCUSED MONITORING REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  SE 20 Least restrictive program selected | | **FMR Rating:**  Partially Implemented |
| **Department TFM Findings:**  An analysis of data and staff interviews indicated that IEP Teams do not always consider the least restrictive environment for students, with consideration given to any potential harmful effect on the student or on the quality of services that he or she needs. Data demonstrated the following:  Approximately 53.8% of eligible special education students are served in full inclusion placements, a rate lower than the state rate of approximately 67.2%.  Approximately 20.3% of eligible students are served in substantially separate placements, a rate higher than the state rate of 13.2%. | | |
| **Description of Corrective Action:**  By December 1st, 2023, the District will form a district-wide inclusion team, including district administrators, general education teachers, and special education teachers in order to conduct a root cause analysis of special education placements across the middle and high school, with particular focus on inclusion rates. Evidence will include the names and roles of the team members. By January 1, 2024, the District will submit the results of a root-cause analysis conducted by the inclusion team, along with a corresponding action and progress monitoring plan. The action plan will outline steps the team will take to increase full inclusion placements and ensure that appropriate supports and interventions are available in general education programs. By April 1, of 2024 professional development will be provided to general education and special education staff related to consideration of the least restrictive environment for students and consideration of potential detrimental effects on the quality of the services or programming the student needs. | | |
| **Title/Role(s) of Responsible Persons:**  David Messing, Director of Pupil Services | | **Expected Date of Completion:**  04/01/2024 |
| **Evidence of Completion of the Corrective Action:**  1. By 12/1/23 the district will submit the names of inclusion team members and a schedule of the team's activities.  2. By 1/1/24 the district will submit the results of the root-cause analysis and a corresponding action plan for increasing inclusion rates.  3. By 4/1/24 the district will submit the signed attendance sheets, agendas, and training materials on least restrictive environment (LRE) requirements and strategies for ensuring appropriate support and services in full inclusion settings. | | |
| **Description of Internal Monitoring Procedures:**  Each fall and spring, the principals and Director of Pupil Services will review the district's special education placement data to ensure continued progress in addressing the overall inclusion rates. Additionally, the district will provide ongoing professional development to all relevant staff on least restrictive environment (LRE) requirements and strategies for ensuring appropriate support and services in full inclusion settings. Other initiatives will be implemented based on the root cause analysis, action plan, and results from ongoing progress monitoring. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 20 Least restrictive program selected | **Corrective Action Plan Status:** Approved  **Status Date:** 12/06/2023  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By December 29, 2023, the district will submit the names and roles of district administrators, general education teachers, and special education teachers who form the district-wide Inclusion Team. The district will also submit a schedule for future meetings of the Inclusion Team.  By January 30, 2024, the district will submit the results of a root-cause analysis, including analysis of data, conducted by the Inclusion Team.  By March 30, 2024, the district will submit an action and progress monitoring plan for increasing inclusion rates. The action plan will outline steps the team will take to increase the percentage of full inclusion placements, while ensuring that appropriate supports and accommodations are available in general education classrooms. Subsequent progress reports will be based on the root cause analysis and steps set forth in the action and progress monitoring plan. | | |
| **Progress Report Due Date(s):**  12/29/2023  01/30/2024  03/30/2024 | | |

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| **Criterion & Topic:**  SE 34 Continuum of alternative services and placements | | **FMR Rating:**  Partially Implemented |
| **Department TFM Findings:**  Please see SE 20 regarding the lack of inclusive opportunities for students within the special education continuum of alternative services and placements. | | |
| **Description of Corrective Action:**  By December 1st, 2023, the District will form a district-wide inclusion team, including district administrators, general education teachers, and special education teachers in order to conduct a root cause analysis of special education placements across the middle and high school, with particular focus on inclusion rates. Evidence will include the names and roles of the team members. By January 1, 2024, the District will submit the results of a root-cause analysis conducted by the inclusion team, along with a corresponding action and progress monitoring plan. The action plan will outline steps the team will take to increase full inclusion placements and ensure that appropriate supports and interventions are available in general education programs. By April 1, of 2024 professional development will be provided to general education and special education staff related to consideration of the least restrictive environment for students and consideration of potential detrimental effects on the quality of the services or programming the student needs. | | |
| **Title/Role(s) of Responsible Persons:**  David Messing, Director of Pupil Services | | **Expected Date of Completion:**  04/01/2024 |
| **Evidence of Completion of the Corrective Action:**  1. By 12/1/23 the district will submit the names of inclusion team members and a schedule of the team's activities.  2. By 1/1/24 the district will submit the results of the root-cause analysis and a corresponding action plan for increasing inclusion rates.  3. By 4/1/24 the district will submit the signed attendance sheets, agendas, and training materials on least restrictive environment (LRE) requirements and strategies for ensuring appropriate support and services in full inclusion settings. | | |
| **Description of Internal Monitoring Procedures:**  Each fall and spring, the principals and Director of Pupil Services will review the district's special education placement data to ensure continued progress in addressing the overall inclusion rates. Additionally, the district will provide ongoing professional development to all relevant staff on least restrictive environment (LRE) requirements and strategies for ensuring appropriate support and services in full inclusion settings. Other initiatives will be implemented based on the root cause analysis, action plan, and results from ongoing progress monitoring. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 34 Continuum of alternative services and placements | **Corrective Action Plan Status:** Approved  **Status Date:** 12/06/2023  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  See SE 20 for required elements of progress reports. | | |
| **Progress Report Due Date(s):**  12/29/2023  01/30/2024  03/30/2024 | | |