

**Athol-Royalston Regional School District**

**Tiered Focused Monitoring Report**

**For** **Group B Universal Standards**

**Tier Level** **2**

**Date of Onsite Visit:** **March 6, 2020**

**Date of Final Report:** **June 15, 2020**



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Commissioner of Elementary and Secondary Education

During the 2019-2020 school year, Athol-Royalston Regional School District participated in a Tiered Focused Monitoring Review conducted by the Department’s Office of Public School Monitoring. The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

Districts and charter schools are reviewed every three years through Tiered Focused Monitoring. This review process emphasizes elements most tied to student outcomes, and alternates the focus of each review on either Group A Universal Standards or Group B Universal Standards.

Group A Universal Standards address:

* Student identification
* IEP development
* Programming and support services
* Equal opportunity

Group B Universal Standards address:

* Licensure and professional development
* Parent/student/community engagement
* Facilities and classroom observations
* Oversight
* Time and learning
* Equal access

In addition, the Department has reserved a specific set of criteria, collectively known as Targeted Standards, employed when LEA or school-level risk assessment data indicate that there is a potential issue. Identified Targeted Standards are assessed in addition to the Universal Standards.

Universal Standards and Targeted Standards are aligned with the following regulations:

Special Education (SE)

* selected requirements from the federal Individuals with Disabilities Education Act (IDEA-2004); the federal regulations promulgated under that Act at 34 CFR Part 300; M.G.L. c. 71B, and the Massachusetts Board of Education’s Special Education regulations (603 CMR 28.00), as amended effective March 1, 2007.

Civil Rights Methods of Administration and Other General Education Requirements (CR)

* selected federal civil rights requirements, including requirements under Title VI of the Civil Rights Act of 1964; the Equal Educational Opportunities Act of 1974; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, together with selected state requirements under M.G.L. c. 76, Section 5 as amended by Chapter 199 of the Acts of 2011 and M.G.L. c. 269 §§ 17 through 19.
* selected requirements from the Massachusetts Board of Education’s Physical Restraint regulations (603 CMR 46.00).
* selected requirements from the Massachusetts Board of Education’s Student Learning Time regulations (603 CMR 27.00).
* various requirements under other federal and state laws.

Tiered Focused Monitoring allows for differentiated monitoring based on a district/charter school’s level of need, the Tiers are defined as follows:

LEAs in Tiers 1 and 2 have been determined to have no or low risk:

* Tier 1/Self-Directed Improvement: Data points indicate no concern on compliance and performance outcomes – meets requirements.
* Tier 2/Directed Improvement: No demonstrated risk in areas with close link to student

outcomes – low risk.

LEAs in Tiers 3 and 4 have demonstrated greater risk:

* Tier 3/Corrective Action: Areas of concern include both compliance and student

outcomes – moderate risk.

* Tier 4/Cross-unit Support and Corrective Action: Areas of concern have profound effect on student outcomes and ongoing compliance – high risk.

The phases of Tiered Focused Monitoring for Athol-Royalston Regional School District included:

Self-Assessment Phase:

* District reviewed special education and civil rights documentation for required elements including document uploads.
* Upon completion of this internal review, the district’s self-assessment was submitted to the Department for review.

On-site Verification Phase:

* Review of additional documents for special education or civil rights.
* Surveys of parents of students with disabilities: Parents of students with disabilities were sent a survey to solicit information regarding their experiences with the district’s implementation of special education programs, related services, and procedural requirements.
* Interviews of staff consistent with those criteria selected for onsite verification.
* Interviews of parent advisory council (PAC) representatives and other telephone interviews, as requested, by other parents or members of the general public.
* Observations of classrooms and other facilities: The onsite team visited a sample of classrooms and school facilities used in the delivery of programs and services to determine general levels of compliance with program requirements.

**Report: For Tier 1 & 2 Tiered Focused Monitoring Reviews**

Following the onsite visit, the onsite team holds an informal exit meeting to summarize its comments for the superintendent or charter school leader. Within approximately 20 business days of the onsite visit, the onsite chairperson forwards to the superintendent or charter school leader the findings from the Tiered Focused Monitoring Review. All districts/charter schools in Tiers 1 and 2, as part of the reporting process, then develop a Continuous Improvement and Monitoring Plan (CIMP) for any criteria receiving a rating of "Partially Implemented," "Not Implemented," and “Implementation in Progress.” The CIMP outlines an action plan, identifies the success metric, describes the measurement mechanism and provides a completion timeframe to bring those areas into compliance with the controlling statute or regulation. Districts and charter schools are expected to incorporate the CIMP actions into their district and school improvement plans, including their professional development plans.

# **DEFINITION OF COMPLIANCE RATINGS**

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| **Commendable** | Any requirement or aspect of a requirement implemented in an exemplary manner significantly beyond the requirements of law or regulation. |
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| **Implemented** | The requirement is substantially met in all important aspects. |
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| **Implementation in Progress** | This rating is used for criteria containing new or updated legal requirements and means that the district has implemented any old requirements contained in the criterion and is training staff or beginning to implement the new requirements in such a way that the onsite team anticipates that the new requirements will be implemented by the end of the school year. |
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| **Partially Implemented** | The requirement, in one or several important aspects, is not entirely met. |
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| **Not Implemented** | The requirement is totally or substantially not met. |
| **Not Applicable** | The requirement does not apply to the school district or charter school. |

**Athol-Royalston Regional School District**

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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|  | **Universal Standards**  **Special Education** | **Universal Standards**  **Civil Rights and Other General Education Requirements** |
| **IMPLEMENTED** | SE 15, SE 32, SE 35, SE 36, SE 50, SE 51, SE 52, SE 52A, SE 54, SE 55, SE 56 | CR 3, CR 7,  CR 7B, CR 7C, CR 12A, CR 16, CR 20, CR 21, CR 22, CR 23, CR 24, CR 25 |
| **PARTIALLY**  **IMPLEMENTED** |  | CR 7A, CR 10A, CR 10B, CR 10C, CR 17A |
| **NOT IMPLEMENTED** |  |  |

The Tiered Focused Monitoring Toolkit, which includes the regulatory requirements specific to the special education and civil rights criteria referenced in the table above, can be found at <http://www.doe.mass.edu/psm/resources/default.html>.

| **Improvement Area** **1** |
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| **Criterion:** CR 7A - School year schedules |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Document review and interviews indicated that the district does not schedule at least 990 hours of structured learning time a year for the Athol High School Alternative Program, a program serving secondary school students. |
| **LEA Outcome:** The district will ensure the Athol High School's Alternative Program meets the required 990 hours for structured learning time. |
| **Action Plan:** The district interviewed students who had dropped out of school to learn more about their challenges and needs. This led to the development of the AHS Alternative School. The Alternative School provides content-based coursework using the Edgenuity platform with the opportunity for students to meet in person with teachers and counselors Tuesdays through Thursdays from 2:00-4:00. This program was intended to include work-based learning for all students enrolled in the program. The work-based learning did not take place for the six students enrolled in the program. Moving forward, we are applying for a waiver so we can restructure this program to ensure a clear plan, oversight of the program and all components of the program are in compliance.  The district submitted a letter to DESE requesting a waiver for the AHS Alternative School Program on March 5, 2020.  The district anticipates an initial response from the Department by November 13, 2020, as described on the DESE website: http://www.doe.mass.edu/redesign/SLTwaiver.html.  By January 24, 2021, the district will submit the waiver that has been approved by DESE.  By January 24, 2021, if the waiver is not approved, the district will no longer offer the program and the district will provide a description of how it will continue to serve those students originally placed in the program.  By January 24, 2021, the district will provide an update to the school committee, students and parents. |
| **Success Metric:** The district will continue to meet the requirements of the waiver, if approved. If the waiver is not approved, the district will work with the program students to maintain them in district with 990 hours of structured learning time.  Evidence:  \*The approved waiver or a description of how it will continue to serve the students originally placed in the program |
| **Measurement Mechanism:** The district will continue to monitor the program's effectiveness and compliance with the components of the waiver on an annual basis. In addition, the district will revisit program components and structure ahead of the waiver expiration to determine how best to proceed.  If the district is not granted the waiver, the district will need to ensure the program is operating with 990 hours. |
| **Completion Timeframe:** 01/24/2021 |
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| **Improvement Area 2** |
| **Criterion:** CR 10A - Student handbooks and codes of conduct |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Document review and interviews indicated that the procedures for the discipline of students with disabilities in the district-wide student handbook and in the student handbooks at each school level, with the exception of the middle school, do not include that the Team will convene within 10 days of the decision to suspend a student to review all relevant information in the student's file, including the IEP. The handbooks also do not include that the parents will be notified of the decision to suspend no later than the date of the decision to take disciplinary action.  In addition, the handbooks do not include the required content for the procedures assuring due process in disciplinary proceedings for all students (see CR 10C). |
| **LEA Outcome:** The district-wide student handbook and the student handbooks at each school level will have consistent and accurate information in alignment with this criterion. The district will develop a protocol for yearly review of the handbooks and dissemination to families. |
| **Action Plan:** The district intends to take a strategic and multi-step approach to ensuring the student handbooks at each school level and the district-wide student handbook are compliant. The process will begin with a review and update of all handbooks by the Assistant Principal team by June 2020.  Each school and district-wide handbook will be updated to reflect that the procedures for the discipline of students with disabilities in the district-wide student handbook and in the student handbooks at each school level include that the Team will convene within 10 days of the decision to suspend a student to review all relevant information in the student's file, including the IEP. Also, each will be updated to include that the parents will be notified of the decision to suspend no later than the date of the decision to take disciplinary action. In addition, the handbooks will be updated to include the required content for the procedures assuring due process in disciplinary proceedings for all students (see CR 10C).  A procedure for annual review of the student handbooks at each school level and district-wide student handbook will be submitted for review by the Superintendent to be included in the district procedural manual by June 2020.  The student handbooks at each school level and the district-wide student handbook will be submitted for approval to the school committee.  By the start of the school year, handbooks approved by the school committee will be disseminated to families and posted on the district website.  By October 26, 2020, the district will have posted all revised handbooks on the district website and will have provided all notifications to families, staff and students of the revisions made to the student handbooks at each school level and district-wide student handbook.  By October 26, 2020, the district will submit its procedure for yearly review of handbooks codified in the district procedural manual. |
| **Success Metric:** By September 2020, 100% of district student handbooks will be in compliance with civil rights criteria, disseminated to families and posted on the district website.    By September 2020, a procedure for yearly review of handbooks will be codified in the district procedural manual.  Evidence:  \*Revised district-wide student handbook posted on the district website  \*Revised student handbooks, at each school level, posted on the district website  \*Procedures for yearly review of handbooks in the district procedural manual |
| **Measurement Mechanism:** Each year, the schools will review school level student handbooks and the district-wide handbook and submit them to the school committee for approval.  Under the direction of the Director of Pupil Services, the Assistant Principal team will review the student handbooks annually and suggest changes in relation to any updates to regulations, laws or criteria as necessary.  Any changes made will be vetted through the school committee and these changes will be made available to families and staff through email and by posting on the district website. |
| **Completion Timeframe:** 10/26/2020 |
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| **Improvement Area 3** |
| **Criterion:** CR 10B - Bullying Intervention and Prevention |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Document review and interviews indicated that the district-wide student handbook and the faculty handbook have not been updated to clarify that a member of the school staff may be named the "aggressor" or "perpetrator" in a bullying report.  In addition, training materials do not contain consistent definitions of bullying to include the bullying of students by a school staff member. |
| **LEA Outcome:** The district will update all handbooks and training materials to comply with civil rights criteria. |
| **Action Plan:** The Assistant Principal team will review all school level student handbooks, the district-wide student handbook, faculty handbook and training for consistency and compliance by June 2020.  The district will update the district-wide student handbook and the faculty handbook to clarify that a member of the school staff may be named the "aggressor" or "perpetrator" in a bullying report. Also, training materials will be updated to contain consistent definitions of bullying to include the bullying of students by a school staff member.  The district will develop a procedure for periodic review of training materials and the anti-bullying plan will be submitted for review by the Superintendent to be included in the district procedural manual by June 2020.  The district-wide student handbook and the faculty handbook will be reviewed and submitted for approval to the school committee.  By October 26, 2020, the district will provide the district-wide handbook and the faculty handbook to include that a member of the school staff may be named the "aggressor" or "perpetrator" in a bullying report.  By October 26, 2020, the district will provide the revised training materials that will contain consistent definitions of bullying to include the bullying of students by a school staff member.  By January 24, 2021, the district will provide evidence (agendas, training materials) of professional development provided to staff. |
| **Success Metric:** By September 2020, 100% of district student handbooks will be in compliance with civil rights criteria, disseminated to families and posted on the district website.  By September 2020, a procedure for yearly review of the anti-bullying plan and training will be codified in the district procedural manual.  By January 24, 2021, all staff will be trained regarding the district anti-bullying plan and procedures during a faculty meeting.  Evidence:  \*Updated district-wide student handbook posted on district website  \*Updated faculty handbook posted on district website  \*All training materials and agendas  \*Procedure for annual review of anti-bullying plan and training |
| **Measurement Mechanism:** Under the direction of the Director of Pupil Services, the Assistant Principal team will annually review the district anti-bullying plan, staff training, the district-wide student handbook and faculty handbook and make changes in relation to any updates to regulations, laws or criteria as necessary.  All changes made will be shared with families and staff through email and posted on the district website. |
| **Completion Timeframe:** 01/24/2021 |
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| **Improvement Area 4** |
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| **Criterion:** CR 10C - Student Discipline |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Document review and interviews indicated that the district's procedures for the principal's hearing for long-term suspension do not include the requirement to send a written determination that addresses:  - the date and the participants of the hearing; and  - the key facts and conclusions.    The procedures for the superintendent's hearing do not address:  - if a student/parent's notice of appeal is not timely, the superintendent may deny or allow the appeal;  - the requirement for the superintendent to hold the hearing within three school days of the request, unless the student/parent request an extension of up to 7 additional calendar days, which the superintendent will grant;  - a written notice to be sent to the parent of the date, time, and location of the hearing;  - an audio recording of the hearing will be arranged; and  - the student shall have all rights afforded the student at the principal's hearing for long-term suspension.  In addition, document review indicated that the student discipline procedures contain elements inconsistent with M.G.L c. 71, § 37H 3/4. This includes requiring a meeting with a parent prior to re-admission to school after suspension and reference to informal hearings. |
| **LEA Outcome:** The district will ensure that the district's student discipline policy and procedures are compliant. This will include updating the district's procedures for the principal's hearing for long-term suspension to include the requirement to send a written determination that addresses:  - the date and the participants of the hearing; and  - the key facts and conclusions.    The procedures for the Superintendent's hearing will address:  - if a student/parent's notice of appeal is not timely, the Superintendent may deny or allow the appeal;  - the requirement for the Superintendent to hold the hearing within three school days of the request, unless the student/parent request an extension of up to 7 additional calendar days, which the Superintendent will grant;  - a written notice to be sent to the parent of the date, time, and location of the hearing;  - an audio recording of the hearing will be arranged; and  - the student shall have all rights afforded the student at the principal's hearing for long-term suspension.  The district will review the policy and procedures to ensure that the student discipline procedures do not contain elements inconsistent with M.G.L c. 71, § 37H 3/4. This includes requiring a meeting with a parent prior to re-admission to school after suspension and reference to informal hearings.  The district will codify procedures for periodic review in the district procedural manual.  The Superintendent, Director of Pupil Services and Office of Civil Rights Officer will provide yearly training to administrators around discipline procedures. |
| **Action Plan:** The district will update the student discipline procedures to ensure compliance with civil rights criteria in partnership with counsel by June 2020.  The Assistant Principals will also develop a procedure for yearly training and review of the student discipline policy and procedures to be submitted for review by the Superintendent and added to the district procedural manual by June 2020.  All administrators will be made aware of the changes to procedures and letters regarding student discipline by August 2020.  As these procedures will be in the district handbooks, families and students will be made aware through the process by which they are notified about the new handbooks.  All administrators will be trained in discipline procedures and the use of corresponding letters by September 2020.  By October 26, 2020, the district will provide all revised materials, including the new procedure for annual review of the district's student discipline procedures.  By October 26, 2020, the district will provide evidence (agendas, training materials) of professional development provided to staff. |
| **Success Metric:** By September 2020, 100% of district student discipline procedures and trainings will be in compliance with civil rights criteria.  By September 2020, a procedure for yearly review of restraint procedures and trainings will be codified in the district procedural manual.  By September 30th, 2020, all administrators will be trained in discipline procedures and the use of corresponding letters. These trainings will be scheduled annually.  Evidence:  \*Revised student discipline procedures in the district-wide student handbook posted on the district website  \*Revised student discipline procedures in student handbooks, at each school level, posted on the district website  \*Sign-in sheets, training materials and agendas  \*Procedure for annual review of restraint procedures and trainings |
| **Measurement Mechanism:** Under the direction of the Director of Pupil Services, the Assistant Principal team will review the district discipline procedures and corresponding letters annually and make changes in relation to any updates to regulations, laws or criteria as necessary.  All changes made will be shared with families and staff through changes to the handbooks, which will be voted on by the school committee and posted on the district website. |
| **Completion Timeframe:** 10/26/2020 |
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| **Improvement Area 5** |
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| **Criterion:** CR 17A - Use of physical restraint on any student enrolled in a publicly-funded education program |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Document review and interviews indicated that the district's restraint prevention and behavior support policy and procedures do not include:  - methods for preventing student violence, self-injurious behavior and suicide;  - methods for engaging parents in discussions about restraint prevention and use; and  - a procedure for receiving and investigating complaints. |
| **LEA Outcome:** The district's restraint prevention and behavior support policy and procedures will be updated to include:  - methods for preventing student violence, self-injurious behavior and suicide;  - methods for engaging parents in discussions about restraint prevention and use; and  - a procedure for receiving and investigating complaints. |
| **Action Plan:** The Assistant Principal team will review all procedures and training for consistency and compliance in June 2020.  All training materials will be updated to reflect appropriate information regarding restraint as outlined in the feedback report in June 2020.  The district will develop a procedure for periodic review of training materials and restraint procedures will be submitted for review by the Superintendent to be included in the district procedural manual. Once approved, mandatory online staff training will be updated in time for the start of school.  The restraint procedures and training will be reviewed and revised by a consultant hired by the district in June 2020.  The school committee is currently in the process of reading the updated restraint policy. The updated policy will be located on the district website by October 2020.  Updated training will be posted on the district website and updated procedures will be codified in the district procedural manual.  By the start of the school year, all staff will be trained on updated elements of the restraint procedures and policy.  By October 26, 2020, the district will provide the revised physical restraint policy and procedures.  By October 26, 2020, the district will provide evidence (agendas, training materials) of professional development provided to staff within the first month of the school year. |
| **Success Metric:** By September 2020, 100% of district student restraint procedures and trainings will be in compliance with civil rights criteria, disseminated to families and posted on the district website.  By September 2020, a procedure for yearly review of restraint procedures and trainings will be codified in the district procedural manual.  Evidence:  \*Revised restraint prevention and behavior support policy and procedures will be posted on the district website  \*Agendas, sign-in sheets and training materials  \*Procedure for annual review of restraint procedures and trainings |
| **Measurement Mechanism:** Under the direction of the Director of Pupil Services, the Assistant Principal team will annually review the district restraint procedures and staff trainings and make changes in relation to any updates to regulations, laws or criteria as necessary.  All changes made will be shared with families and staff through email and posted on the district website. |
| **Completion Timeframe:** 10/26/2020 |
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