

**Springfield International Charter School**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **2**

**Dates of Virtual Visit:** **May 10-14, 2021**

**Date of Final Report: August 4, 2021**



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Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Springfield International Charter School 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/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 the charter school included:

Self-Assessment Phase:

* The charter school reviewed special education and civil rights documentation for required elements including document uploads.
* The charter school reviewed a sample of student records for the discipline of students in special education.
* Upon completion of these two internal reviews, the charter school’s self-assessment was submitted to the Department for review.

Verification Phase:

* Review of student records for the discipline of students in special education: The Department selected a sample of student records from the charter school’s special education student roster. The review team conducted this review, using standard Department procedures, to determine whether disciplinary procedural and programmatic requirements are being met.
* Review of additional documents for special education and 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 verification.
* Interview of one special education parent advisory council (SEPAC) representative.
* Observations of classrooms and other facilities: The review team reviewed floor plans of school buildings which included 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 review, the review team holds an informal exit meeting to summarize its comments for the superintendent or charter school leader. Within approximately 20 business days of the review, the 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. |
| **Implemented** | The requirement is substantially met in all important aspects. |
| **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 review team anticipates that the new requirements will be implemented by the end of the school year. |
| **Partially Implemented** | The requirement, in one or several important aspects, is not entirely met. |
| **Not Implemented** | The requirement is totally or substantially not met. |
| **Not Applicable** | The requirement does not apply to the school district or charter school. |

Springfield International Charter School

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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|  | **Universal Standards**  **Special Education** | **Universal Standards**  **Civil Rights and Other General Education Requirements** | **Targeted Standards** |
| **IMPLEMENTED** | SE 15, SE 35, SE 36, SE 50, SE 51, SE 52,  SE 52A, SE 54, SE 55, SE 56 | CR 3, CR 7, CR 7A, CR 7B, CR 7C, CR 8, CR 10A, CR 10B, CR 12A, CR 16, CR 17A, CR 20,  CR 22, CR 23, CR 25 | SE 44, SE 45, SE 46, SE 47 |
| **PARTIALLY**  **IMPLEMENTED** | SE 32 | CR 10C, CR 21, CR 24 |  |
| **NOT**  **IMPLEMENTED** |  |  |  |
| **NOT**  **APPLICABLE** |  |  |  |

The review instruments, that include the regulatory requirements specific to the special education and civil rights criteria referenced in the table above, can be found at [www.doe.mass.edu/psm/resources/default.html](http://www.doe.mass.edu/psm/resources/default.html).

| **Improvement Area** **1** |
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| **Criterion:** SE 32 - Parent advisory council for special education |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and interviews indicated that although the charter school has a Special Education Parent Advisory Council (SEPAC) that meets regularly and conducts at least one workshop annually on the rights of students and their parents and guardians under the state and federal special education laws, the SEPAC does not have established by-laws regarding officers and operational procedures. |
| **LEA Outcome:** Springfield International Charter School will work in partnership with SEPAC members to establish by-laws regarding officers and operational procedures. |
| **Action Plan:** By November 8, 2021, the charter school will submit the SEPAC by-laws and a list of officers. |
| **Success Metric:** By November 2021 and beyond, the charter school's SEPAC will have established by-laws regarding officers and operational procedures.  **Evidence:**   * SEPAC by-laws * List of SEPAC officers |
| **Measurement Mechanism:** The Director of Special Education will annually review SEPAC by-laws and conduct ongoing outreach for new SEPAC members. The Director of Special Education will continue to support the SEPAC in fulfilling all duties, which include advising the school on matters that pertain to the education and safety of all students with disabilities and meeting regularly with school officials to participate in the planning, development, and evaluation of the school's special education programs. Additionally, the Director of Special Education will continue to, in cooperation with the SEPAC, provide an annual workshop on student and parent rights under state and federal special education law and convene at least six meetings throughout each school year. |
| **Completion Timeframe:** 11/08/2021 |
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| **Improvement Area 2** |
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| **Criterion:** CR 10C - Student Discipline |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and interviews indicated that the charter school does not have a discipline data collection system that disaggregates by race, ethnicity, gender, socio-economic status, English language learner status, and students with a disability status. The charter school does not have procedures in place to ensure that school leaders periodically review the extent and impact of disciplinary actions on selected populations and modify disciplinary practices, as appropriate. |
| **LEA Outcome:** Springfield International Charter School will update its discipline data collection system to allow for disaggregation of data by selected populations including race, ethnicity, gender, socio-economic status, English language learner status, and students with a disability status. The charter school will have procedures in place to ensure that school leaders periodically review the extent and impact of disciplinary actions on selected populations and modify disciplinary practices, as appropriate. |
| **Action Plan:** By August 30, 2021, the charter school will update its discipline data collection system to allow for disaggregation by selected populations and submit a description of the updated system.  By August 30, 2021, the charter school will submit procedures for the periodic review of discipline data by selected populations and the modification of disciplinary practices, as appropriate.  By November 8, 2021, the charter school will train school leaders on the newly developed procedures. Evidence will include agendas, training materials, and signed attendance sheets.  By January 6, 2022, the charter school will commence the periodic review of discipline data by selected populations. Evidence will include results of the discipline data review, data analysis, and modifications made to disciplinary practices, as appropriate. |
| **Success Metric:** By January 2022 and beyond, the charter school will maintain a discipline data collection system that disaggregates by race, ethnicity, gender, socio-economic status, English language learner status, and students with a disability status. The charter school will implement procedures for the periodic review of discipline data by selected populations to determine whether it is necessary or appropriate to modify disciplinary practices due to over-reliance on expulsion, or in-school or out-of-school suspension, or emergency removals.  **Evidence:**   * Description of updated data collection system * Revised procedures * Agendas, training materials, and signed attendance sheets * Results of the review of discipline data by selected populations including data analysis and modifications |
| **Measurement Mechanism:** School leaders will review discipline data quarterly and modify disciplinary practices, as appropriate.  Annually, school leaders will review the student discipline policy and Family and Student Handbook to ensure policies are compliant. |
| **Completion Timeframe:** 01/06/2022 |
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| **Improvement Area 3** |
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| **Criterion:** CR 21 - Staff training regarding civil rights responsibilities |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents indicated that although the charter school provides civil rights training on sexual harassment, the training does not address the prevention of discrimination and harassment on the basis of students' race, color, sex, gender identity, religion, national origin, and sexual orientation and the appropriate methods for responding to it in the school setting. |
| **LEA Outcome:** Springfield International Charter School will annually train all staff on the prevention of discrimination and harassment on the basis of students' race, color, sex, gender identity, religion, national origin, and sexual orientation and the appropriate methods for responding to it in the school setting. |
| **Action Plan:** By November 8, 2021, the charter school will submit updated training materials that address the prevention of discrimination and harassment.  By January 6, 2022, the charter school will hold an all-staff training on the prevention of discrimination and harassment. Evidence will include the agenda and signed attendance sheets. |
| **Success Metric:** By January 2022 and beyond, the charter school will annually train staff on civil rights responsibilities including the prevention of discrimination and harassment on the basis of students' race, color, sex, gender identity, religion, national origin, and sexual orientation and the appropriate methods for responding to it in the school setting.  **Evidence:**   * Training materials, agenda, and signed attendance sheets |
| **Measurement Mechanism:** Annually, the Professional Development Coordinator will review the school-based Professional Development calendar to ensure that staff are trained annually on the prevention of discrimination and harassment on the basis of students' race, color, sex, gender identity, religion, national origin, and sexual orientation and the appropriate methods for responding to it in the school setting. |
| **Completion Timeframe:** 01/06/2022 |
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| **Improvement Area 4** |
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| **Criterion:** CR 24 - Curriculum review |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and interviews indicated that the charter school does not have a process to ensure that individual teachers review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation. Additionally, the charter school does not explicitly require that appropriate activities, discussions, and/or supplementary materials be used to provide balance and context for any stereotypes depicted in materials. |
| **LEA Outcome:** Springfield International Charter School will develop protocols to ensure that individual teachers review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin, and sexual orientation. The charter school will also ensure that appropriate activities, discussions and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in materials. |
| **Action Plan:** By November 8, 2021, a subset of building administrators will participate in the LEA Equity Guide and CR 24.25 Toolkit training provided by the Department of Elementary and Secondary Education. Training will address the requirement for individual teachers to review all educational materials.  By November 8, 2021, the charter school will submit the procedures, protocols, and tools developed to ensure individual teachers review all educational materials and the provision of appropriate activities, discussions, and/or supplementary materials.  By January 6, 2022, the charter school will train all teachers and other relevant staff on the newly developed procedures, protocols, and tools. Evidence will include agendas, training materials, and signed attendance sheets.  By March 7, 2022, the charter school will develop and implement an internal monitoring system that includes administrative oversight of training, classroom observations, and the completion of curriculum review tools by individual teachers. Completed review tools will be collected and reviewed by administrators. Evidence will include a description of the internal monitoring system and examples of curriculum review tools completed by individual teachers. |
| **Success Metric:** By March 2022 and beyond, all individual teachers will review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation. In addition, the charter school will ensure that appropriate activities, discussions and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in materials.  **Evidence:**   * Updated procedures, protocols, and tools * Agendas, training materials, and signed attendance sheets * Description of internal monitoring systems * Examples of curriculum review tools completed by individual teachers |
| **Measurement Mechanism:** The Interim Director will conduct a quarterly review of protocols and data gathered through the internal monitoring process to identify areas of improvement and ensure ongoing compliance. The Interim Director will also ensure that all teachers are annually trained on the procedures, protocols, and tools. |
| **Completion Timeframe:** 03/07/2022 |
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