

**Benjamin Franklin Classical Charter Public School**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **1**

**Date of Onsite Visit:** **November 29, 2021**

**Date of Final Report:** **February 14, 2022**



Jeffrey C. Riley

Commissioner of Elementary and Secondary Education

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**TIERED FOCUSED MONITORING REPORT**

**Benjamin Franklin Classical Charter Public School**

[REPORT INTRODUCTION 3](#_Toc95654650)

[TIERED FOCUSED MONITORING FINAL REPORT 6](#_Toc95654651)

[DEFINITION OF COMPLIANCE RATINGS 7](#_Toc95654652)

[SUMMARY OF COMPLIANCE CRITERIA RATINGS 8](#_Toc95654653)

[CONTINUOUS IMPROVEMENT AND MONITORING PLAN 9](#_Toc95654654)

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **REPORT INTRODUCTION**

During the 2021-2022 school year, Benjamin Franklin Classical Charter Public School participated in a Tiered Focused Monitoring Review (TFM) conducted by the Department’s Office of Public School Monitoring (PSM). The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

Each school district, charter school, vocational school, and virtual school undergoes a Tiered Focused Monitoring Review every three years. The statewide Tiered Focused Monitoring cycle is posted at <<https://www.doe.mass.edu/psm/tfm/6yrcycle.html>>.

Regularly monitored standards are divided into two groups, known as Group A Universal Standards and Group B Universal Standards. Districts and schools are monitored on an alternate set of Universal Standards every three years.

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

The Department has also reserved a specific set of criteria, collectively known as Targeted Standards, employed if LEA or school level risk assessment data indicate there is a potential issue; the 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 the Every Student Succeeds Act (ESSA); 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.

**PSM Team:**

Depending upon the size of a school district and the number of special education programs to be reviewed, a team of one to four Department staff members conducts onsite activities over one to five days in a school district or charter school.

**Tier Level:**

The level of monitoring varies based on tier designation, aligning supports to the level of need and ensuring that districts and schools with greater needs receive appropriate supports to make sustained improvements.

|  |  |  |  |
| --- | --- | --- | --- |
| Tier | Title | Description | Level of Risk |
| 1 | Self-Directed Improvement | Data points indicate no concern on compliance and student outcomes. | Meets requirements |
| 2 | Directed Improvement | No demonstrated risk in areas with close link to student outcomes. | Low |
| 3 | Corrective Action | Areas of concern include both compliance and student outcomes. | Moderate |
| 4 | Cross-unit Support and Corrective Action | Areas of concern have a profound effect on student outcomes and ongoing compliance. | High |

For the 2021-2022 school year, the tier assignments are based on:

* Five-year cohort graduation rate for students with disabilities
* Public School Monitoring compliance data from the previous review
* Problem Resolution System data, specifically findings of noncompliance
* Special education State Performance Plan/Annual Performance Reports (SPP/APR) compliance Indicator data for Indicators 11, 12, and 13 (Group A only)
* Indicator 11: Child Find
* Indicator 12: Early Childhood Transition
* Indicator 13: Secondary Transition
* Special education SPP/APR performance Indicator data for Indicators 5 & 6
* Indicator 5: Education Environments (6-21)
* Indicator 6: Preschool Environments
* Significant Disproportionality data 2019-2020 & 2020-2021

Tiering adjustments may be made for districts engaged in work with the Department’s Statewide System of Support and have schools identified as requiring assistance and intervention. Tiering assignments may also be adjusted for schools and districts unable to remedy noncompliance within one year of the previous TFM review, as well as for charter schools requiring additional oversight based on conditions of their charter.

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

Following the onsite visit, the PSM team holds an informal exit meeting to summarize the review for the superintendent or charter school leader. Within approximately 20 business days of the onsite visit, the chairperson forwards the TFM Feedback Summary that includes findings from the Tiered Focused Monitoring Review to the superintendent or charter school leader.

As part of the reporting process, all districts/charter schools in Tiers 1 and 2, 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 is due to the Department within 20 business days after the issuance of the Feedback Summary and is subject to the Department’s review and approval.

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. Department staff provide support and assistance to districts and charter schools on the development of a CIMP.

Once the CIMP is approved, it is issued as the Final Report.

Department staff also provide ongoing technical assistance as the school or district is implementing the approved CIMP or CAP. **School districts and charter schools must demonstrate effective resolution of noncompliance identified by the Department as soon as possible but in no case later than one year from the issuance of the Department’s Feedback Summary.**

For more information regarding the TFM Review Process, including district and parent resources, please visit < <https://www.doe.mass.edu/psm/tfm/default.html>>.

# **TIERED FOCUSED MONITORING FINAL REPORT**

**Benjamin Franklin Classical Charter Public School**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review at the Benjamin Franklin Classical Charter Public School during the week of November 29, 2021, to evaluate the implementation of Group B Universal Standards in the program areas of special education, civil rights, and other related general education requirements. The team appreciated the opportunity to interview staff and parents, to observe classroom facilities, and to review the programs underway in the district.

In preparing this report, the team reviewed extensive written documentation regarding the operation of the district's programs, together with information gathered by means of the following Department program review methods:

**Self-Assessment Phase:**

* School reviewed special education and civil rights documentation for required elements including document uploads.
* Upon completion of the self-assessment, the school submitted the data to the Department for review.

**On-site Verification Phase (Group B Universal Standards):**

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

|  |
| --- |
| The Tiered Focused Monitoring Report includes those criteria that were found by the team to be implemented in a “Commendable” manner, as well as criteria receiving a rating of "Partially Implemented," "Not Implemented," and “Implementation in Progress.” (Refer to the “Definition of Compliance Ratings” section of the report.) The Tiered Focused Monitoring Reports do not include criteria receiving a rating of “Implemented” or “Not Applicable.” This will allow the district/school and the Department to focus their efforts on those areas requiring corrective action. Districts are expected to incorporate the corrective actions into their district and school improvement plans, including their professional development plans. |
|  | |

# **DEFINITION OF COMPLIANCE RATINGS**

|  |  |
| --- | --- |
| **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; 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. |
|  | |
| **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. |

**Benjamin Franklin Classical Charter Public School**

# **SUMMARY OF COMPLIANCE CRITERIA RATINGS**

|  |  |  |
| --- | --- | --- |
|  | **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 54, SE 55, SE 56 | CR 3, CR 7, CR 7A, CR 7B, CR 8, CR 10A, CR 10B, CR 10C, CR 12A, CR 17A, CR 20, CR 21, CR 22, CR 23 |
| **PARTIALLY**  **IMPLEMENTED** |  | CR 24, CR 25 |
| **NOT**  **IMPLEMENTED** | None | None |
| **NOT**  **APPLICABLE** | SE 52A | CR 7C, CR 16 |

The full list of criteria and information regarding the requirements can be found in Appendix B of the Tiered Focused Monitoring Toolkit available at < <https://www.doe.mass.edu/psm/resources/tfm-toolkit.docx>>.

| **CONTINUOUS IMPROVEMENT AND MONITORING PLAN** |
| --- |
| **Improvement Area** **1** |
| **Criterion:** CR 24 - Curriculum review |
| **Rating:** Partially Implemented |
|  |
| **Description of Current Issue:** A review of documents and interviews indicated that the charter school is working with a diverse group of stakeholders to develop procedures that ensure individual teachers in the school 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. Interviews also indicated that the procedures will include ongoing training to ensure material reviews are completed and appropriate activities, discussions, and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in the materials. However, the procedures have yet to be implemented in the charter school. |
| **LEA Outcome:** Benjamin Franklin Classical Charter Public School (BFCCPS) will 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 April 11, 2022, the charter school will create procedures, protocols, and tools to ensure individual teacher review of all educational materials and the provision of appropriate activities, discussions, and/or supplementary materials. Procedures will include an internal monitoring system that ensures administrative oversight of training and implementation of material review tools by individual teachers.  By September 12, 2022, the charter school will train all instructional staff on the newly developed procedures, protocols, and tools.  By November 7, 2022, the charter school will review the data gathered through the internal monitoring process to identify areas of improvement and ensure ongoing compliance. Appropriate training, feedback, and support will be provided based on the review of data. |
| **Success Metric:** By September 2022 and beyond, all individual teachers in the charter school 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:**   * Procedures, protocols, and tools * Description of the internal monitoring system to ensure ongoing compliance * Training materials, agenda, and signed attendance sheets * Administrative review of data gathered through the internal monitoring process, with corresponding corrective action |
| **Measurement Mechanism:** The BFCCPS Leadership Team, including the Executive Director; Head of School; Assistant Heads of School; and Director of Curriculum, Instruction and Assessment will conduct an annual review of the protocols and ensure that all teachers are trained annually. The BFCCPS Leadership Team will gather data through the internal monitoring process to ensure that all teachers appropriately review materials and provide balance and context, as needed. Specific feedback and support will be provided based on the review of data. |
| **Completion Timeframe:** 11/07/2022 |
|  |

| **CONTINUOUS IMPROVEMENT AND MONITORING PLAN** |
| --- |
| **Improvement Area 2** |
| **Criterion:** CR 25 - Institutional self-evaluation |
| **Rating:** Partially Implemented |
|  |
| **Description of Current Issue:** Document review and interviews indicated that school leadership is collaborating with an outside consultant and the Executive Board to develop procedures to annually assess equitable access to all educational programs. However, these procedures have yet to be implemented and the school does not currently evaluate all aspects of its K-8 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. |
| **LEA Outcome:** Benjamin Franklin Classical Charter Public School (BFCCPS) will evaluate all aspects of its K-8 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. The charter school will make such changes as are indicated by the evaluation. |
| **Action Plan:** By April 11, 2022, the charter school, in collaboration with an outside consultant and the Executive Board, will create protocols, procedures, and tools to conduct an annual self-evaluation of its K-8 program.  By September 12, 2022, the charter school will train all relevant staff members on the protocols, procedures, and tools developed to conduct the annual self-evaluation.  By November 7, 2022, the charter school will conduct an annual self-evaluation of its K-8 program, including athletics and other extracurricular activities. The school will analyze the results of the completed self-evaluation, outline the conclusions reached, and develop an action plan to address any identified issues. |
| **Success Metric:** By November 2022 and beyond, the BFCCPS Leadership Team will evaluate all aspects of its K-8 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities, and make such changes as are indicated by the evaluation.  **Evidence:**   * Protocols, procedures, and tools * Training materials, meeting agendas, and signed attendance sheets * The results of a completed annual self-evaluation, including conclusions reached * An action plan to address any identified issues |
| **Measurement Mechanism:** The BFCCPS Leadership Team will annually review the protocols, procedures, and tools used to conduct an annual self-evaluation; ensure that appropriate training occurs for those engaged in the evaluation; and evaluate its K-8 program. The BFCCPS Leadership Team will review the results of the self-evaluation in the summer prior to each school year and make recommendations, including necessary policy updates, program changes, and budget resource allocations to address the results of the self-evaluation. |
| **Completion Timeframe:** 11/07/2022 |
|  |