

**Lincoln-Sudbury Regional High School**

**Tiered Focused Monitoring Report**

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

**Tier Level** **2**

**Dates of Onsite Visit:** **January 6 & 7, 2021**

**Date of Final Report:** **May 10, 2021**



Jeffrey C. Riley

Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Lincoln-Sudbury Regional High 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 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); and
* 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 Lincoln-Sudbury Regional High School included:

Self-Assessment Phase:

* The 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 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 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**

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

**Lincoln-Sudbury Regional High School**

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Universal Standards**  **Special Education** | **Universal Standards**  **Civil Rights and Other General Education Requirements** | **Targeted Standards** |
| **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 7A, CR 7B, CR 7C, CR 8, CR 10A, CR 10B, CR 12A, CR 17A, CR 20, CR 21,  CR 22, CR 23, CR 24 |  |
| **PARTIALLY**  **IMPLEMENTED** |  | CR 10C, CR 16,  CR 25 | SE 34 |
| **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** |
| --- |
| **Criterion:** SE 34 - Continuum of alternative services and placements |
| **Rating:** Partially Implemented |
|  |
| **Description of Current Issue:** A review of documents and administrative interviews indicated that the district is operating a public day program, the Lincoln-Sudbury (LS) Academy, which does not have current approval from the Department of Elementary and Secondary Education. The program is housed in a separate, off-site facility and is staffed with a counselor, licensed special education teachers, and paraprofessionals. The program has an enrollment cap of 20 students, with 17 students currently enrolled. According to administrative interviews, students attending LS Academy are identified with substantially separate placements on their IEPs or are undergoing extended evaluations. |
| **LEA Outcome:** Lincoln-Sudbury Regional High School will ensure that LS Academy operates as a Department of Elementary and Secondary Education (DESE) approved therapeutic day program. |
| **Action Plan:** By June 4, 2021, Lincoln-Sudbury Regional High School will submit a completed Form 3 (Notification of Intent to Apply for Approval of a Public Day School or Program) to DESE.    By August 20, 2021, Lincoln-Sudbury Regional High School will submit the initial application with DESE seeking approval for LS Academy as a Massachusetts public day school special education program. |
| **Success Metric:** The Lincoln-Sudbury Academy will have provisional or full approval status as a special education school program prior to enrolling students for SY 21-22.  Evidence:  \* Form 3  \* Initial application for Lincoln-Sudbury Academy as a Massachusetts public day school |
| **Measurement Mechanism:** Continuing after the completion deadline:  The district will ensure that Lincoln-Sudbury Academy's approved program standards are maintained, and any programmatic changes are submitted to the DESE for approval, as required. |
| **Completion Timeframe:** 08/20/2021 |
|  |

| **Improvement Area 2** |
| --- |
| **Criterion:** CR 10C - Student Discipline |
| **Rating:** Partially Implemented |
|  |
| **Description of Current Issue:** A review of documents and administrative interviews indicated that although the district's parental notice for short-term suspensions includes the disciplinary charge, potential consequences, an opportunity to respond to the charges, and a meeting with the principal, if requested, it does not set forth the principal's obligation to provide, in writing, the student's hearing rights and the parent's opportunity to participate in the hearing, prior to the student's suspension.  In addition, a review of documents and administrative interviews indicated that the district does not have disciplinary procedures for in-school suspension or emergency removal. Document review and interviews also indicated that the district has not developed a system for periodic review of discipline data by the principal to assess the extent of suspensions and removals or the impact of such disciplinary action on selected student populations. |
| **LEA Outcome:** Lincoln-Sudbury Regional High School will ensure that the district's discipline policy and procedures adhere to regulatory requirements of 603 CMR 53.00, specifically:  - Short-term suspension procedures include that the principal provides, in writing, the student's hearing rights and the parent's opportunity to participate in the hearing, prior to the student's suspension;  - Disciplinary procedures for in-school suspension and emergency removal; and  - A system for periodic review of discipline data by the principal to assess the extent of suspensions and removals or the impact of such disciplinary action on selected student populations. |
| **Action Plan:** Lincoln-Sudbury Regional High School's discipline policy and procedures will adhere to all regulatory requirements of 603 CMR 53.00.  By June 4, 2021, the district will submit its revised procedures for discipline hearings and procedures for in-school suspension and emergency removals.  By June 4, 2021, the district will submit its school handbook, demonstrating the inclusion of the required discipline procedures.  By August 20, 2021, the district will submit evidence of a data system to document and analyze disciplinary suspensions of students.  By August 20, 2021, the district will submit procedures for periodic review of discipline data.  By August 20, 2021, the district will submit training materials and signed attendance sheets for administrators and administrative assistants on discipline procedures, documentation, internal monitoring, and analysis.  By November 19, 2021, the district will submit a review of discipline/suspension data that assesses the extent of suspensions and removals and the impact of such disciplinary action on selected student populations. |
| **Success Metric:** The district's handbook will include procedures for in-school suspension, emergency removals, and revised procedures for short-term suspension hearings. In addition, the district will have a discipline data tracking system to review and assess quarterly the extent of suspensions and removals and the impact of such disciplinary action on selected student populations.  Evidence:  \* Procedures for emergency removal and in-school suspension  \* Revised procedures for short-term suspension hearings  \* Link to posted 2021-22 handbook with updated procedures  \* Procedures for internal, quarterly discipline review on the extent of suspensions and removals and the impact of such disciplinary action on selected student populations  \* Signed training attendance sheet and materials  \* Documentation of data review |
| **Measurement Mechanism:** Continuing after the completion deadline:  Each quarter, administrative staff will review discipline data to determine if principals provided, in writing, the student's hearing rights and the parent's opportunity to participate in the hearing, prior to the student's suspension.  Each quarter, administrative staff will review discipline data to determine the extent of suspensions and removals and the impact of such disciplinary action on selected student populations. |
| **Completion Timeframe:** 11/19/2021 |
|  |

| **Improvement Area 3** |
| --- |
| **Criterion:** CR 16 - Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion |
| **Rating:** Partially Implemented |
|  |
| **Description of Current Issue:** A review of documents and administrative interviews indicated that while the district works to prevent students from dropping out of school, the district does not send a notice to students 16 and over and their parents/guardians within five days of the student's tenth consecutive absence. This notice should include the following:  - An invitation to an exit interview to discuss the reasons the student is permanently leaving school;  - At least two dates and times for the exit interview within 10 days of sending the notice; and  - The opportunity for an extension of the meeting date for up to 14 days at the request of the parent. |
| **LEA Outcome:** Lincoln-Sudbury Regional High School will ensure that a notice is consistently sent to students 16 and over and their parents/guardians within five days of the student's tenth consecutive absence. This notice will include the following:  - An invitation to an exit interview to discuss the reasons the student is permanently leaving school;  - At least two dates and times for the exit interview within 10 days of sending the notice; and  - The opportunity for an extension of the meeting date for up to 14 days at the request of the parent. |
| **Action Plan:** By June 4, 2021, the district will submit the revised notice to send to students 16 and over and their parents/guardians within five days of the student's tenth consecutive absence, along with procedures for sending the initial notice.  By August 20, 2021, the district will submit its method to track students 16 and older who are absent consecutive days.  By August 20, 2021, the district will submit training materials and signed attendance sheets for associate principals, guidance counselors and administrative assistants on the outreach procedures and required notice.  By November 19, 2021, the district will submit a data review process to determine whether the district's outreach is consistent and to identify any possible patterns and/or trends among students 16 and over with consecutive days of absence. |
| **Success Metric:** Lincoln-Sudbury Regional High School will consistently send notice to students 16 and over and their parents/guardians within five days of the student's tenth consecutive absence and the notice will include all required content.  Evidence:  \* Revised initial notice to students 16 and over and their parents/guardians  \* Signed training attendance sheet and materials, including procedures for sending the initial notice  \* Procedures for bi-annual data review |
| **Measurement Mechanism:** Continuing after the completion deadline:  Lincoln-Sudbury Regional High School's administrative team will ensure that students 16 and over and their parents/guardians receive notification within five days of the student's tenth consecutive absence.  Lincoln-Sudbury Regional High School's administrative team will conduct bi-annual data reviews to ensure ongoing compliance with its procedures and to identify any patterns or trends in student absences. |
| **Completion Timeframe:** 11/19/2021 |
|  |

| **Improvement Area 4** |
| --- |
| **Criterion:** CR 25 - Institutional self-evaluation |
| **Rating:** Partially Implemented |
|  |
| **Description of Current Issue:** A review of documents and administrative interviews indicated that although a strategic plan has been developed, the district does not evaluate all aspects of its 9-12 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:** Lincoln-Sudbury Regional High School will establish annual procedures for conducting the institutional self-evaluation 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 9-12 programs, including athletics and other extracurricular activities. |
| **Action Plan:** By June 4, 2021, the district will submit its institutional self-evaluation implementation plan, including the data gathering tools, timeline of activities and assigned staff to ensure equal access to all 9-12 programs, including athletics and other extracurricular activities.  By August 20, 2021, the district will submit evidence of conducting the self-evaluation process and initial data analysis identifying any barriers or trends.  By November 19, 2021, the district will submit a narrative summary regarding the outcomes of the institutional self-evaluation, any changes made to address barriers to equal access, and the district's plan to share the outcomes with the school committee. |
| **Success Metric:** Lincoln-Sudbury Regional High School will conduct an annual institutional self-evaluation 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 9-12 programs, including athletics and other extracurricular activities.  Evidence:  \* Self-evaluation procedures, including data-gathering tools, implementation timelines, and assigned staff  \* Materials documenting the self-evaluation process and initial data analysis identifying any barriers or trends  \* A narrative summary on the outcomes of the institutional self-evaluation  \* School committee meeting agenda and minutes |
| **Measurement Mechanism:** Continuing after the completion deadline:  Lincoln-Sudbury Regional High School will annually conduct an institutional self-evaluation and report to the school committee on the outcomes of the review. |
| **Completion Timeframe:** 11/19/2021 |
|  |