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| **MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**  **Program Quality Assurance Services** |

##### PROGRAM REVIEW

## CORRECTIVE ACTION PLAN

Special Education Agency: Cotting School, Inc.

Program Review Onsite Year: 2016-2017

**Programs under review for the agency:**

A - Cotting Day Program

B - Cotting HOPEhouse Residential Program

C - Cotting Summer Day Program

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 Program Review Final Report dated 07/31/2017.

**Mandatory One-Year Compliance Date:** **07/31/2018**

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

| **Criterion** | **Criterion Title** | **Applies To** | **PR Rating** |
| --- | --- | --- | --- |
| PS 8.8 | IEP - Progress Reports | A,C | Partially Implemented |
| PS 11.1 | Staff Policies and Procedures Manual | B | Partially Implemented |
| PS 11.4 | Teachers (Special Education Teachers and Regular Education Teachers) | A,C | Partially Implemented |

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| PROGRAM REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  PS 8.8 IEP - Progress Reports | | **PR Rating:**  Partially Implemented |
| **Applies To:**  A - Cotting Day Program  C - Cotting Summer Day Program | | |
| **Department Program Review Findings:**  A review of student records indicated progress reports do not always include written information on the student's progress toward the annual goals in the IEP. | | |
| **Description of Corrective Action:**  During the 2017-2018 school year and prior to the start of the 2018 extended school year, all faculty responsible for writing IEP progress reports will participate in professional development activities and training. (Prior to the first quarter progress report due date of 11/9/17 and prior to 7/9/18 - the start of Cotting Summer 2018 Day Program). Training will be provided by the Chief Academic Officer and/or Special Education Coordinator. Training will include IEP goal progress monitoring and data collection, addressing students' progress towards their annual IEP goals, and determining if their progress was sufficient to enable the students to achieve their annual IEP goals by the end of the IEP period. Training will also stress how to write progress reports, including: content of progress reports; quality indicators for writing progress reports. | | |
| **Title/Role(s) of Responsible Persons:**  Krista Macari, Chief Academic Officer  Leah Thibodeau, Special Education Coordinator | | **Expected Date of Completion:**  11/17/2017 |
| **Evidence of Completion of the Corrective Action:**  All Cotting students' progress reports will be reviewed annually by the Chief Academic Officer, Special Education Coordinator, Director of Upper School, and Director of Middle School to ensure written compliance. All reports will include written information of each student's progress toward the annual goals of the IEP. Any report which does not include such information, will be sent back to the author of the report for progress report re-training/supervision as needed. | | |
| **Description of Internal Monitoring Procedures:**  Prior to issuing first quarter progress reports to students' parents and school districts, the Chief Academic Officer and Special Education Coordinator will work with other program administrators/supervisors to review all progress reports to target individual staff members who require additional training and support for writing progress reports. Thereafter, to insure continued compliance, the same process will occur for 20% of all progress reports to be issued on a quarterly basis. Prior to issuing the Summer Progress report (8/10/18), the 20% process will continue for Cotting Day students who attend the Cotting Summer Day Program and for all other students who only attend the Cotting Summer Day Program. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 8.8 IEP - Progress Reports | **Corrective Action Plan Status:** Approved  **Status Date:** 10/03/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By November 17, 2017, Cotting Day Program must submit (1) a list of all teachers, related service providers, supervisors and administrators responsible for writing and/or reviewing progress reports for all students;  (2) The date(s) these staff participated in professional development training on the topic of progress reports, the training materials, and attendance sheet(s); and, (3) the names, positions, date(s) of training(s), additional training materials and attendance sheets for additional professional development provided on progress reports for those staff who required additional training.  By February 16, 2018, Cotting Day Program must submit (1) a random sample of the progress reports written for four students; (2) the results of the quarterly reviews of 20% of progress reports issued for the second quarter; and (3) Evidence of any follow up training that was required.  By July 10, 2018, Cotting Summer Program must submit (1) a list of all teachers, related service providers, supervisors and administrators responsible for writing and/or reviewing progress reports for all students;  (2) The date(s) these staff participated in professional development training on the topic of progress reports, the training materials, and attendance sheet(s); and (3) the results of the administrator/supervisor review of the fourth quarter progress reports for the students attending the Cotting Summer program. | | |
| **Progress Report Due Date(s):**  11/17/2017  03/09/2018  07/10/2018 | | |

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| PROGRAM REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  PS 11.1 Staff Policies and Procedures Manual | | **PR Rating:**  Partially Implemented |
| **Applies To:**  B - Cotting HOPEhouse Residential Program | | |
| **Department Program Review Findings:**  A review of staff records indicated the agency did not follow its own policy regarding how frequent staff are to be evaluated based on their performance. | | |
| **Description of Corrective Action:**  HOPEhouse at Cotting School will review and revise its personnel policies and procedures to clarify when and how all staff performance will be evaluated. All new staff will be reviewed annually for their first three years of employment. After three years, staff will be evaluated no less than every three years. After ten years of employment, staff will be evaluated no less than once every five years. The Chief Operating Officer and the Program Director will work together to follow through with ensuring that all performance evaluations are completed by the employee's supervisor, reviewed by the employee and signed by the employee and the supervisor. | | |
| **Title/Role(s) of Responsible Persons:**  Bridget Irish, Chief Operating Officer  Zoe Thibodeau, Program Director | | **Expected Date of Completion:**  09/30/2017 |
| **Evidence of Completion of the Corrective Action:**  HOPEhouse at Cotting School will collect evidence that all employee performance evaluations are completed by filing the completed documents in an employee's personnel file after they are reviewed and signed by the employee and the supervisor. | | |
| **Description of Internal Monitoring Procedures:**  HOPEhouse at Cotting School will internally monitor the frequency of all employee's performance evaluations by tracking due dates along with existing staff training documentation requirements to ensure that they are completed as required. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 11.1 Staff Policies and Procedures Manual | **Corrective Action Plan Status:** Approved  **Status Date:** 10/03/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By November 17, 2017, Cotting HopeHouse Residential Program must submit a (1) A revised policy and procedures for staff performance evaluation; (2) The template used for staff performance evaluations; (3) a list of all program staff and their most recent evaluation date; and (4) evidence of the internal monitoring mechanism that will be used to track, document and file staff performance evaluation of all staff.  By July 10, 2018, the program must submit evidence that all staff have been evaluated consistent with the revised policy. | | |
| **Progress Report Due Date(s):**  11/17/2017  07/10/2018 | | |

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| PROGRAM REVIEW  **CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:**  PS 11.4 Teachers (Special Education Teachers and Regular Education Teachers) | | **PR Rating:**  Partially Implemented |
| **Applies To:**  A - Cotting Day Program | | |
| **Department Program Review Findings:**  Documentation review and interviews indicate that one teacher teaches outside of his or her approved license areas for more than 20% of the school day. | | |
| **Description of Corrective Action:**  Cotting Day and Cotting Summer Day Programs will ensure that teachers do not teach outside of their approved license areas for more than 20% of the school day. Prior to the start dates of the new school year or extended school year, the Chief Academic Officer will work with the Special Education Coordinator to validate teacher license areas through access of ELAR. As teacher schedules are being developed, careful consideration will be given to any out of license area teaching assignments given to teachers. If out of license area teaching assignments are given to any teacher, percentage of teaching time will be calculated based on total instruction time. Teachers will not be given teaching assignments that will exceed 20% of the school day. | | |
| **Title/Role(s) of Responsible Persons:**  Krista Macari, Chief Academic Officer | | **Expected Date of Completion:**  10/01/2017 |
| **Evidence of Completion of the Corrective Action:**  Teaching rosters for Cotting Summer Day Program for 2017 and Cotting Day Program for the 2017-2018 school year with documentation of teachers who are teaching for any amount of time outside of their license area will be submitted to the Massachusetts Department of Elementary & Secondary Education by 10/1/2017. | | |
| **Description of Internal Monitoring Procedures:**  The Chief Academic Officer will monitor teaching assignments given to any teacher prior to the start of the start dates of the new school year so that out of license area teaching assignments will not exceed 20% of the school day. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 11.4 Teachers (Special Education Teachers and Regular Education Teachers) | **Corrective Action Plan Status:** Approved  **Status Date:** 10/03/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By November 17, 2017, Cotting Day Program must submit: (1) A list of all teachers teaching any amount of time outside of their license area and list the actual percentage of time and subject they are teaching outside of their license area and (2) A copy of the current license or approved waiver for those teachers.  On February 16, 2018, the program must submit the same evidence above for any teachers whose teaching assignments changed since the beginning of the school year. | | |
| **Progress Report Due Date(s):**  11/17/2017  03/09/2018 | | |

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| **Criterion & Topic:**  PS 11.4 Teachers (Special Education Teachers and Regular Education Teachers) | | **PR Rating:**  Partially Implemented |
| **Applies To:**  C - Cotting Summer Day Program | | |
| **Department Program Review Findings:**  Documentation review and interviews indicate that some teachers teach outside of their approved license areas for more than 20% of the school day. | | |
| **Description of Corrective Action:**  Cotting Day and Cotting Summer Day Programs will ensure that teachers do not teach outside of their approved license areas for more than 20% of the school day. Prior to the start dates of the new school year or extended school year, the Chief Academic Officer will work with the Special Education Coordinator to validate teacher license areas through access of ELAR. As teacher schedules are being developed, careful consideration will be given to any out of license area teaching assignments given to teachers. If out of license area teaching assignments are given to any teacher, percentage of teaching time will be calculated based on total instruction time. Teachers will not be given teaching assignments that will exceed 20% of the school day. | | |
| **Title/Role(s) of Responsible Persons:**  Krista Macari, Chief Academic Officer | | **Expected Date of Completion:**  10/01/2017 |
| **Evidence of Completion of the Corrective Action:**  Teaching rosters for Cotting Summer Day Program for 2017 and Cotting Day Program for the 2017-2018 school year with documentation of teachers who are teaching for any amount of time outside of their license area will be submitted to the Massachusetts Department of Elementary & Secondary Education by 10/1/2017. | | |
| **Description of Internal Monitoring Procedures:**  The Chief Academic Officer will monitor teaching assignments given to any teacher prior to the start of the start dates of the new school year so that out of license area teaching assignments will not exceed 20% of the school day. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  PS 11.4 Teachers (Special Education Teachers and Regular Education Teachers) | **Corrective Action Plan Status:** Approved  **Status Date:** 10/03/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By July 10, 2018, Cotting Summer Program must submit: (1) A list of all teachers teaching any amount of time outside of their license area and list the actual percentage of time and subject they are teaching outside of their license area and (2) A copy of the current license or approved waiver for those teachers. | | |
| **Progress Report Due Date(s):**  07/10/2018 | | |