***Massachusetts Department of***

***Elementary and Secondary Education***

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December 12, 2016

Ms. Denise Rizzo

Executive Director

Realizing Children's Strengths Learning Center, Inc.

6 Strathmore Road

Natick, MA 01760

Re: Mid-cycle Review and Verification of previous Program Review Corrective Action Plan

|  |
| --- |
| A - RCS Day Program  B - RCS Intensive Day Program |

Dear Ms. Rizzo:

Enclosed is the Department of Elementary and Secondary Education’s (“Department”) Mid-cycle Review Report based upon the Mid-cycle Review conducted in your private school programs in November 2016. This Mid-cycle Review Report contains the Department's findings regarding the implementation status and effectiveness of corrective steps taken in response to your previous Program Review Report issued on October 2, 2014. This report also includes a report on the status of implementation for new state or federal special education requirements enacted since your programs’ last Program Review.

We are pleased to indicate that the Department has found your programs’ approved Corrective Action Plan to be substantially implemented and effective in remedying the previously identified noncompliance issues. Additionally, we have determined that your programs are in substantial compliance with the selected Mid-cycle Review criteria as well as any new state or federal special education requirements enacted since your last Program Review. You and your entire staff are to be congratulated for your efforts in implementing all necessary improvements.

However, the Department is concerned regarding the number of enrolled students for both programs due to available space at the current location. RCS must not enroll additional students into either program and begin the process of working back towards the approved enrollment numbers of 36 for the Intensive Day Program and 6 for the Day Program per the 2015 Reconstruction. Therefore, as students leave the program, RCS must not refill the open slot by enrolling another student.

Your program will now receive an updated status of “Full Approval.” This approval shall remain in effect for three (3) years and will be contingent upon continued compliance with all regulations contained within 603 CMR 28.00 “Special Education Regulations” and 603 CMR 18.00 “Program And Safety Standards For Approved Public Or Private Day And Residential Special Education School Programs.” The Department may change this approval status at any point during this three-year period if circumstances arise that warrant such a change.  
  
The Department will notify you of your programs’ next regularly scheduled Program Review several months before it is to occur. At this time we anticipate the next routine monitoring visit to occur sometime during the 2019-2020 school year, unless the Department determines that there is some reason to schedule this visit earlier.

**Please be advised that the attached Department Approval Certificates must be conspicuously posted in a public place within the program as required by 603 CMR 28.09.**

Your staff's cooperation throughout these follow-up monitoring activities is appreciated. Should you require additional clarification of information included in our report, please do not hesitate to contact the Onsite Team Chairperson.

Sincerely,

Dee Wyatt, Mid-cycle Review Chairperson

Office of Approved Special Education Schools

Nina Marchese, Director

Office of Approved Special Education Schools

c: Mitchell D. Chester, Ed.D., Commissioner of Elementary and Secondary Education

Caryn Goldberg, Supervisor, Office of Approved Special Education Schools

Encl.: Mid-cycle Review Report

Full Approval Certificates, Expiration Date: August 31, 2020

RCS Day Program

RCS Intensive Day Program

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|  | ESE Logo | **MID-CYCLE REVIEW REPORT**  **Realizing Children's Strengths Learning Center, Inc.**  **MCR Onsite Dates:** **11/09/2016 - 11/10/2016**  **Programs under review for the agency:**  **A - RCS Day Program**  **B - RCS Intensive Day Program** |
|  |  | Mitchell D. Chester, Ed.D.  Commissioner of Elementary and Secondary Education |
| **MID-CYCLE REVIEW REPORT** | | |

| **PS Criterion #2.2 - Approvals, Licenses, Certificates of Inspection** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that there were current approvals, licenses and certificates of inspection for all buildings used by the students. |

| **PS Criterion #2.3 - EEC Licensure (Residential Programs Only)** |
| --- |
| **Rating:** |
| Not Applicable |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| This standard is not applicable to day programs. |

| **PS Criterion #4.4 - Advance Notice of Proposed Program/Facility Change** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, a review of documentation and interviews indicated that prior to making several substantial changes to the program and physical plant, the program did not provide written notification of intent to change to the Department for approval.  During the Mid-cycle Review, observations and staff interviews indicated that the program has not made any further substantial changes to the program or physical plant that required a Form 1 approval by the Department. |

| **PS Criterion #4.5 - Immediate Notification** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that the policy on Immediate Notification regarding serious incidents meets the current requirements and included notification to appropriate parties of such incidents, as well as the person responsible for oversight. A review of student records showed that the program maintains copies of all incidents regarding students. |

| **PS Criterion #5.1 - Student Admissions** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that the Student Admissions Policy contained all required elements of this criterion, including that the program maintains a copy of its policies and procedures manual on site and that the program provides annual written notice to the parents of enrolled students that copies of its policies and procedures manual are available upon request. |

| **PS Criterion #6.1 - Daily Instructional Hours** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that all students were scheduled to receive the required number of instructional hours. |

| **PS Criterion #6.1(a) - Physical Education Requirements** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, a review of documentation and interviews indicated there was no overall plan for students to receive physical education.  During the Mid-cycle Review, documentation and staff interviews indicated the program has developed and is implementing a clear plan for students to receive physical education. |

| **PS Criterion #6.4 - School Days Per Year** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that the required number of school days was scheduled for all students. |

| **PS Criterion #8.5 - Current IEP & Student Roster** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and student records indicated that there was a current IEP for each enrolled Massachusetts student that had been issued by the responsible public school district and consented to by the student's parent or student, when applicable. In student records where an IEP was found to not be current, there was documentation of the program?s efforts to obtain a current IEP from the responsible school district. |

| **PS Criterion #9.1 - Polices and Procedure for Behavior Support** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and interviews indicated that the program has developed and is implementing written Behavior Support Policies and Procedures consistent with the regulations under 603 CMR 46.00 regarding appropriate responses to student behavior that may require immediate intervention. Behavior support policies and procedures are reviewed annually and are provided to staff annually and made available to parents of enrolled students. |

| **PS Criterion #9.1(a) - Student Separation Resulting from Behavior Support** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, observations and interviews indicated that the time-out room door did not have an inside handle which prevented students from being able to get out in case of an emergency.  During the Mid-cycle Review, observations indicated that the time-out room door now allows for students to exit on their own from inside the room. In addition, a review of documentation and staff interviews indicated that the policies and procedures regarding Student Separation Resulting from Behavior Management include that a student must be continuously observed by a staff member at all times, staff shall be with the student or immediately available to the student at all times, procedures are in place for obtaining principal approval of the time-out for more than 30 minutes based upon the student?s continuing agitation and that time out shall cease as soon as the student has calmed. |

| **PS Criterion #9.4 - Physical Restraint** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and staff interviews indicated that the program administers physical restraints only in emergency situations of last resort when needed to protect a student and/or a member of the school community from assault or imminent, serious, physical harm and with extreme caution in order to prevent or minimize any harm to the student as a result of the use of physical restraint. |

| **PS Criterion #10.1 - Staffing for Instructional Groupings** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, a review of documentation, interviews, and observations indicated that teachers did not always have the ability to oversee instruction being delivered by unlicensed staff to their assigned students.  During the Mid-cycle Review, a review of documentation, interviews, and observations indicated that teachers now have the ability through technology to oversee the instruction being delivered by unlicensed staff to their assigned students. |

| **PS Criterion #10.2 - Age Range** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, a review of documentation indicated not all instructional groupings were within the 48-month age span requirement.  During the Mid-cycle Review, a review of documentation indicated that all instructional groupings are now operating within the 48-month age span requirement. |

| **PS Criterion #11.1 - Staff Policies and Procedures Manual** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that the program has personnel policies and procedures that include the following: criteria and procedures for hiring, Criminal Offender Record Information, fingerprint requirements, evaluation of staff, discipline of staff, the handling of staff complaints, a plan for using volunteer and/or intern services and a statement of equal access for employment and/or educational opportunities. |

| **PS Criterion #11.3 - Educational Administrator Qualifications** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that the Educational Administrator possessed the required qualifications to serve in this position. |

| **PS Criterion #11.4 - Teachers (Special Education Teachers and Regular Education Teachers)** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, documentation and interviews indicated not all teachers were licensed or had been granted a waiver for the older students they were teaching.  During the Mid-cycle Review, a review of documentation indicated that the teaching staff were appropriately licensed or had been granted an appropriate waiver for the ages of the students being taught. |

| **PS Criterion #11.5 - Related Services Staff** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, not all staff providing related services were reported on the Related Services Staff Roster and a copy of their credentials were not provided.  During the Mid-cycle Review, a review of documentation indicated that all staff providing or supervising the provision of related services were reported on the Related Services Staff Roster and were appropriately certified, licensed or registered in their professional areas. |

| **PS Criterion #11.6 - Master Staff Roster** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated the Master Staff Roster contained the name, program job title, corresponding Uniform Financial Report (UFR) title number and full-time equivalent (FTE) for all staff. The Master Staff Roster also accurately corresponded to the last approved staffing plan. |

| **PS Criterion #11.9 - Organizational Structure** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, a review of documentation and interviews indicated that the roles of the Special Education Teacher and the Behavior Therapist were not clearly defined and inappropriately overlapped.  During the Mid-cycle Review, a review of documentation and interviews indicated the job descriptions of the Special Education Teacher and the Behavior Therapist have been revised to clearly define the appropriate roles of each position. |

| **PS Criterion #11.12 - Equal Access** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and staff interviews indicated that all students were provided with equal access to services, facilities, activities and benefits regardless of race, color, sex, gender identity, religion, national origin, sexual orientation, disability or homelessness. |

| **PS Criterion #12.1 - New Staff Orientation and Training** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and staff records indicated that the program has a written plan for New Staff Orientation and Training that includes all mandated trainings prior to staff being assigned direct care duties with students and such training was documented in staff records. |

| **PS Criterion #12.2 - In-Service Training Plan and Calendar** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and staff records indicated that the program has an In-Service Training Plan and Calendar that shows that staff receive training in all mandated training topics annually, the program has a plan for staff to participate in outside training opportunities and that staff receive an average of two hours of training each month in which the school is in session. In addition, such training was documented in staff records. |

| **PS Criterion #13.2 - Kitchen, Dining, Bathing/Toilet and Living Areas** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| At the time of the 2013 Program Review, interviews and observations indicated that the shared space for the two approved programs was an issue due to the unapproved increase in enrollment for the Intensive Program, the unapproved enrollment of older students, the move of the Occupational Therapy room to a smaller room, and the unapproved change of the use of school space that was previously designated for indoor activities.  During the Mid-cycle Review, interviews and observations indicated that the teachers now have the ability to oversee all of their assigned students simultaneously, though they are being served in separate small rooms throughout the facility, through the use of technology. The program has also developed a workable plan for the sharing and use of the Occupational Therapy room and has made arrangements for appropriate space for physical activities and physical education classes at several off-site facilities. |

| **PS Criterion #14.2 - Food and Nutrition** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and staff interviews indicated that the program makes breakfast and lunch available to publicly-funded students with disabilities as they would have access to such meals in their sending school district. A copy of the written plan was submitted that describes the method of collaborating with districts to provide a free or reduced breakfast or lunch to eligible students. |

| **PS Criterion #15.5 - Parent Consent and Required Notification** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and student records indicated that the program maintains annual required parental consents for each student. |

| **PS Criterion #19 - Anti-Hazing** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of student records indicated a copy of the anti-hazing legislation was received by all secondary school age students and that the program's anti-hazing disciplinary code approved by the Board of Directors had been distributed to all secondary school age students. |

| **PS Criterion #20 - Bullying Prevention and Intervention** |
| --- |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and staff interviews indicated that the student admissions materials/handbook was updated to conform to the updated amended Bullying Prevention and Intervention Plan (“Plan”) and was consistent with the amendments to the Massachusetts anti-bullying law, including making clear that a member of the school staff may be named the “aggressor” or “perpetrator” in a bullying report. There was evidence of staff, students and parents/guardians having been annually notified in writing of the Plan and a professional development plan was in place for all staff, with evidence of its implementation provided. |