Jeffrey C. Riley

*Commissioner*

Massachusetts Department of Elementary and Secondary Education

*75 Pleasant Street, Malden, Massachusetts 02148-4906 Telephone: (781) 338-3000 TTY: N.E.T. Relay 1-800-439-2370*

Lesli Suggs

President and Chief Executive Officer The Home for Little Wanderers

10 Guest Street

Boston, MA 02115

Re: Approved Special Education Schools Mid-cycle Review and Verification of previous Program Review Corrective Action Plan

C - The COVE Day School

D – The COVE Residential Program

G - Clifford Academy Day Program

H - Clifford Academy Residential Program I - Clifford Academy Summer Program

Dear Ms. Suggs:

Enclosed is the Department of Elementary and Secondary Education’s (“Department”) Approved Special Education Schools Mid-cycle Review Report based on the virtual Mid-cycle Review conducted in your approved special education school programs in January 2023.

This report includes the Department's findings regarding the implementation status and effectiveness of corrective taken and subsequent progress reports submitted in response to your previous Program Review Report issued on December 20, 2019. This report also includes detailed findings describing the determinations of the Department about the implementation status of selected Mid-cycle review criteria as well as the implementation of new state or federal special education requirements enacted since your programs’ last Program Review.

For requirements not found to be fully implemented, the Department has prepared a Corrective Action Plan for the programs that must be implemented without further delay. You will find these requirements for corrective action and further progress reporting included in the attached report, together with any steps that must be taken by the programs to fully implement special education requirements.

# Please note that all programs must demonstrate 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 Final Mid-cycle Review Report.

At this time, the Department requests that you upload a written assurance signed by you and the Chairperson of your Board of Directors. This statement must contain:

1. a description of the steps the programs are taking to make the Department’s findings available to staff, parent advisory groups and the general public; and
2. an assurance that your programs will implement the corrective action ordered by the Department within the required timelines.

Please go into the WBMS and upload your program’s written assurance into Additional Documents no later than **March 24, 2023**. You can do this by accessing: > MCR > Self- Assessment > Additional Documents.

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 2025-2026 school year, unless the Department determines that there is some reason to schedule this visit earlier.

The approval certificates enclosed with this correspondence shall remain in effect until August 31, 2026, and will be contingent upon continued compliance with all regulations contained within 603 CMR 28.00 “Special Education Regulations,” 603 CMR 18.00 “Program And Safety Standards For Approved Public Or Private Day And Residential Special Education School Programs,” and 603 CMR 46.00 “Prevention of Physical Restraint and Requirements If Used.” The Department may change this approval status at any point during this three-year period if circumstances arise that warrant such a change.

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

In closing, we would like to extend our thanks to the administration and staff who shared their time and thoughts so generously during the preparation and virtual review process. Should you require any additional information, please do not hesitate to contact the Team Chairperson.

Sincerely,

Megan Bowie, Chairperson

Office of Approved Special Education Schools

Nina M. Marchese, M.Ed., Director

Office of Approved Special Education Schools

c: Tim Minor, President of the Board of Directors

Jeffrey C. Riley, Commissioner of Elementary and Secondary Education Russell Johnston, Ph.D., Senior Associate Commissioner

Karen A. Brann, Supervisor, Office of Approved Special Education Schools

Encl.: Mid-cycle Review Report

Full Approval Certificate, Expiration Date: August 31, 2026 The COVE Day School

The COVE Residential Program Clifford Academy Day Program Clifford Academy Residential Program Clifford Academy Summer Program

|  |
| --- |
| DESE logo  **MID-CYCLE REVIEW REPORT**  **The Home for Little Wanderers MCR Onsite Dates: 01/17/2023 - 01/20/2023**  **Programs under review for the agency:**  **C - The COVE Day School**  **D – The COVE Residential Program**  **G - Clifford Academy Day Program**  **H - Clifford Academy Residential Program I - Clifford Academy Summer Program**  State Seal of Massachusetts |
| Jeffrey C. Riley  Commissioner of Elementary and Secondary Education |

**MID-CYCLE REVIEW REPORT**

|  |
| --- |
| **PS Criterion #1.2 - Program & Student Descriptions, Program Capacity** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| D - The COVE School Residential Program, G - Clifford Academy Day Program, H - Clifford  Academy Residential Program, I - Clifford Academy Summer Program |
| **Basis for Findings:** |
| A review of documentation, interviews and observations indicated that the program served students consistent with characteristics included in the approved Program & Student Description regarding population of students to be served, ages of students, and educational  and behavioral characteristics of students. |

|  |
| --- |
| **PS Criterion #1.2 - Program & Student Descriptions, Program Capacity** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School |
| **Basis for Findings:** |
| A review of documentation, interviews and observations indicated that the program served students consistent with characteristics included in the approved Program & Student Description regarding population of students to be served, ages of students, and educational  and behavioral characteristics of students. |

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

|  |
| --- |
| **PS Criterion #2.3 - EEC Licensure (Residential Programs Only)** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| D - The COVE School Residential Program, H - Clifford Academy Residential Program |
| **Basis for Findings:** |
| A review of documentation and observations indicated that there was a current license from the Department of Early Education and Care for all residential facilities. |

|  |
| --- |
| **PS Criterion #3.1(d) - Evacuation and Emergency Procedures** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and interviews indicated that the program has developed and implemented Evacuation and Emergency Procedures that comply with 603 CMR 18.05(10). |

|  |
| --- |
| **PS Criterion #4.2 - Public Information and Postings** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that the program maintains onsite and makes available for public information all required postings. |

|  |
| --- |
| **PS Criterion #4.4 - Advance Notice of Proposed Program/Facility Change** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and student records indicated that the policy on Advance Notice of  Proposed Program/Facility Change met the current requirements and included notification to appropriate parties of such incidents, as well as the person responsible for oversight. |

|  |
| --- |
| **PS Criterion #4.5 - Immediate Notification** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation and student records indicated that the policy on Immediate Notification Regarding Serious Incidents met 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 #5.2(a) - Contracts** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of student records indicated the program maintained a signed written contract for  each enrolled student consistent with the requirements of 603 CMR 28.06(3)(f). |

|  |
| --- |
| **PS Criterion #6.1 - Daily Instructional Hours/6.4 School Days Per Year** |
| **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 per year, and that the required number of school days per year 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 review of student records indicated that there was a current Individualized Education Program (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 the student, when applicable. In student records where an IEP was found not to be current,  there was documentation of the program?s efforts to obtain a current IEP from the responsible school district. |

|  |
| --- |
| **PS Criterion #8.8 - IEP - Progress Reports** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, D - The COVE School Residential Program |
| **Basis for Findings:** |
| A review of documentation indicated that progress reports included all required elements and were sent to all required parties. |

|  |  |  |  |
| --- | --- | --- | --- |
| **PS Criterion #9.1(a) - Student Separation Resulting from Behavior Support** | | | |
| **Rating:** |  |  |  |
| Partially Implemented |  |  |  |
| **Applies To:** |  |  |  |
| C - The COVE School Day School, D - The COVE School Residential Program | | | |
| **Basis for Findings:** | | | |
| A review of documentation indicated that the policy and procedures regarding Student Separation Resulting from Behavior Support are consistent with the regulations under 603 CMR 46.00 regarding appropriate responses to students behavior that may require separation from instruction. Staff interviews revealed that the program did not consistently have a means to document the following required elements when a student is separated from group activities: the length of time, reasons for this intervention, who approved the procedure and  who directly observed the student. | | | |
| **Department Order of Corrective Action:** | | | |
| The program must develop a plan for procedures when students temporarily separate from the learning activity. This plan must include at minimum: length of time, reasons for this intervention, who approved the procedure, and who directly observed the student. Once the policy and procedures are approved, the program must provide training to all staff and maintain appropriate training documentation. The training agenda must include the name of the staff providing training, the date, time, and length of the training, and the plan for staff to  make up training if absent. | | | |
| **Required Elements of Progress Reports:** | | | |
| For the 4/14/2023 progress report, the program must submit a copy of 9.1(a) Student Separation Resulting from Behavior Support policy with all required elements and in the correct format. Once the Department has approved the Student Separation as a result of Behavior Policy and Procedures, the program must provide evidence of training for all staff by submitting 1) the name and job title of the person conducting the training; 2) the dates and times when this training was held; 3) the length of time allotted for the training; 4) a list of all staff in alphabetical order by last name with their position title; 5) a copy of the training  materials shared with staff; and 6) for any staff who did not receive the training, the reason why and when their training is scheduled. | | | |
| **Progress Report Due Date(s):** | | | |
| 04/14/2023 | 05/31/2023 |  |  |

|  |
| --- |
| **PS Criterion #9.4 - Physical Restraint** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, D - The COVE School Residential Program |
| **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. Documentation and a review of student records  indicated that Physical Restraint Policies and Procedures were consistent with requirements under 603 CMR 46.00. |

|  |
| --- |
| **PS Criterion #9.7 - Terminations** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, D - The COVE School Residential Program |
| **Basis for Findings:** |
| A review of documentation and staff interviews indicated that the program has developed and implements a written termination policy that includes provisions related to planned and  emergency termination, and that the policy is compliant with regulatory requirements. |

|  |
| --- |
| **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 implements personnel policies and procedures that include the following: criteria and procedures for hiring, Criminal Offender Record Information, Criminal History Record Information fingerprint requirements, staff evaluation, 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 General Education Teachers)** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that at the time of the Mid-cycle Review the teaching  staff were appropriately licensed or had been granted an appropriate waiver for the 2022- 2023 school year. |

|  |
| --- |
| **PS Criterion #11.5 - Related Services Staff** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that at the time of the Mid-cycle Review the staff  providing or supervising the provision of related services were appropriately certified, licensed or registered in their professional areas. |

|  |
| --- |
| **PS Criterion #11.6 - Staff Roster** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| All |
| **Basis for Findings:** |
| A review of documentation indicated that at the time of the Mid-Cycle Review, the Staff Roster contained the names, program job titles, corresponding Uniform Financial Report (UFR) title numbers and full-time equivalents (FTE) for all staff. The Staff Roster also accurately  corresponded to the most recently approved DESE staffing plan. |

|  |
| --- |
| **PS Criterion #11.10 - Supervision of Direct Care Day and Residential Staff** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, G - Clifford Academy Day Program, I - Clifford Academy Summer Program |
| **Basis for Findings:** |
| Review of documentation, staff records and interviews indicated the program has developed and implemented a written plan to indicate how regularly scheduled supervision of all direct care workers by someone who has supervisory and administrative responsibility within the program and how regularly scheduled conferences occurred between direct care workers and  supervisor and between teachers, direct care workers and other educational personnel. |

|  |
| --- |
| **PS Criterion #11.10 - Supervision of Direct Care Day and Residential Staff** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| D - The COVE School Residential Program, H - Clifford Academy Residential Program |
| **Basis for Findings:** |
| Review of documentation, staff records and interviews indicated the program has developed and implemented a written plan to indicate how regularly scheduled conferences occur between residential childcare workers and residential supervisors. Review of documentation, staff records and interviews also indicated the program provided regular supervision of all direct care workers by someone who has supervisory and administrative responsibility within the program and regularly scheduled conferences occurred between direct care workers and  supervisor and between teachers, direct care workers and other educational personnel. |

|  |
| --- |
| **PS Criterion #12.1 - New Staff Orientation and Training** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, D - The COVE School Residential Program |
| **Basis for Findings:** |
| A review of documentation and staff interviews 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 that such training was documented in staff records. |

|  |  |  |  |
| --- | --- | --- | --- |
| **PS Criterion #12.2 - In-Service Training Plan and Calendar** | | | |
| **Rating:** |  |  |  |
| Partially Implemented |  |  |  |
| **Applies To:** |  |  |  |
| C - The COVE School Day School, D - The COVE School Residential Program | | | |
| **Basis for Findings:** | | | |
| A review of documentation and interviews indicated that the program has an In-Service Training Plan and Calendar that shows staff receive training in most 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 for each month the school is in session. However, staff records indicate documentation of mandated annual in-service  training is not maintained for all staff. | | | |
| **Department Order of Corrective Action:** | | | |
| The program must ensure all staff receive an average of 2 hours of training per month that includes all DESE mandated trainings based on the program's In-Service Training Plan and Calendar and all staff records include required documentation of training. The program must develop and implement a procedure to monitor staff training records that includes step by step procedures for completing and documenting reviews of staff training records, the position of the staff member responsible for the reviews, the follow-up plan for make-up training and/or missing training documentation, manner to document outcome and follow-up based on record  review, the frequency record reviews are scheduled to occur, and system to track compliance with procedure to review staff training records. | | | |
| **Required Elements of Progress Reports:** | | | |
| For the 4/14/2023 Progress Report the program must submit the comprehensive procedure to monitor staff training records that includes all required elements of the Department Order of Corrective Action. For the 5/31/2023 Progress Report the program must submit evidence of implementation of the approved procedure to monitor staff training records that includes 1) the date(s) of the record review, 2) a list of staff who were out of compliance with required training and the plan for make-up training, 3) a list of staff whose training record was  incomplete/incorrect and plan to update record. 4) a summary of the process and any changes made to improve the approved procedure. | | | |
| **Progress Report Due Date(s):** | | | |
| 04/14/2023 | 05/31/2023 |  |  |

|  |
| --- |
| **PS Criterion #13.2 - Description of Physical Space** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, D - The COVE School Residential Program |
| **Basis for Findings:** |
| Observations indicated that each room or area that is utilized for the instruction of students was adequate with respect to the number of students, size and age of students and students’ specific educational needs, physical capabilities and educational/vocational activities.  Observations indicated that other facilities used by students were clean, well maintained and free from safety hazards, and that the program provided the facilities, textbooks, equipment,  technology, materials, and supplies needed to provide the special education and related services specified on the IEPs of enrolled students. |

|  |
| --- |
| **PS Criterion #15.1 - Parental Involvement and Parents' Advisory Group** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, D - The COVE School Residential Program |
| **Basis for Findings:** |
| A review of documentation and staff interviews indicated that the program maintains a written plan for involving parents including a Parents' Advisory Group that shall advise the program  on matters that pertain to the education, health and safety of the students in the program. |

|  |
| --- |
| **PS Criterion #15.5 - Parent Consent and Required Notification** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, D - The COVE School Residential Program |
| **Basis for Findings:** |
| A review of documentation and student records indicated that the program maintains annual  required parental consents for each student. |

|  |
| --- |
| **PS Criterion #16.11 - Student Allergies** |
| **Rating:** |
| Implemented |
| **Applies To:** |
| C - The COVE School Day School, D - The COVE School Residential Program |
| **Basis for Findings:** |
| A review of documentation, staff interviews and observations indicated that the program has developed and implements a written policy and procedures protecting students from exposure  to foods, chemicals, or other materials to which they are allergic, as stated by their physician/medical assessment. |