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

##### COORDINATED PROGRAM REVIEW

## CORRECTIVE ACTION PLAN

Charter School or District: Leominster

CPR Onsite Year: 2014-2015

Program Area: Special Education

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 Coordinated Program Review Final Report dated 08/22/2015.

**Mandatory One-Year Compliance Date:** **08/22/2016**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
| --- | --- | --- |
| SE 2 | Required and optional assessments | Partially Implemented |
| SE 3A | Special requirements for students on the autism spectrum | Partially Implemented |
| SE 7 | Transfer of parental rights at age of majority and student participation and consent at the age of majority | Partially Implemented |
| SE 13 | Progress Reports and content | Partially Implemented |
| SE 18A | IEP development and content | Partially Implemented |
| SE 18B | Determination of placement; provision of IEP to parent | Partially Implemented |
| SE 20 | Least restrictive program selected | Partially Implemented |
| SE 24 | Notice to parent regarding proposal or refusal to initiate or change the identification, evaluation, or educational placement of the student or the provision of FAPE | Partially Implemented |
| SE 29 | Communications are in English and primary language of home | Partially Implemented |
| SE 51 | Appropriate special education teacher licensure | Partially Implemented |
| SE 55 | Special education facilities and classrooms | Partially Implemented |
| CR 7 | Information to be translated into languages other than English | Partially Implemented |
| CR 9 | Hiring and employment practices of prospective employers of students | Partially Implemented |
| CR 12A | Annual and continuous notification concerning nondiscrimination and coordinators | Partially Implemented |
| CR 16 | Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | Not Implemented |
| CR 18A | School district employment practices | Partially Implemented |
| CR 21 | Staff training regarding civil rights responsibilities | Partially Implemented |

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| **Criterion & Topic:** SE 2 Required and optional assessments | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of student records indicated that when the district is conducting a re-evaluation, it does not always complete an educational assessment by a representative of the school district, including a history of the student's educational progress in the general curriculum. In addition, the district does not always complete an assessment by a teacher(s) with current knowledge regarding the student's specific abilities in relation to learning standards of the Massachusetts Curriculum Frameworks and the district's general education curriculum, as well as an assessment of the student's attention skills, participation behaviors, communication skills, memory, and social relations with groups, peers, and adults. |
| **Description of Corrective Action:** A Training will be developed and implemented for all special education staff regarding SE 2 criterion requirements focused specifically on the Education Assessment A & B Forms. Training will be completed by sped coordinators |
| **Title/Role(s) of Responsible Persons:**Ned Pratt Director of PPS/Special Education & District Special Education Coordinators | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**Review of Training Materials, Signed Training Attendance Sheets, Training Agendas and Completed Education Assessment A & B Forms will be submitted to DESE |
| **Description of Internal Monitoring Procedures:** Monitoring will be ongoing and include quarterly random record reviews at the Preschool, Elementary, Middle and High School levels and track use of the Ed A&B form usage through esped prepared by the sped coordinators |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 2 Required and optional assessments | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit the revised procedures to ensure that students are assessed in completion of Educational Assessments A and B, along with evidence of staff training on these procedures, which will include a training agenda, signed attendance sheets and copies of the materials presented. Provide evidence of the completion of assessments for each of the students listed on the Student Record Worksheet. This information is due with the November 25, 2015 progress report. By November 25, 2015, submit the description of the internal oversight and tracking system and identify the person(s) responsible for the oversight, including the date of the system's implementation.By February 26, 2016, submit the results of an administrative review of a sample student records(re-evaluations) for each Team Chair. Indicate the number of records reviewed, the number found to be compliant, an explanation of the root cause for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance. \*Please note that when monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the record review; b) Date of the review; c) Name of person(s) who conducted the review, their roles(s), and their signature(s). |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| **Criterion & Topic:** SE 3A Special requirements for students on the autism spectrum | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Although the district has procedures and a checklist for the IEP Team to address the seven components as they relate to autism consideration, record review indicated that whenever an evaluation indicates that a child has a disability on the autism spectrum, IEP Teams are not always considering and specifically addressing all of the following: 1) The child's verbal and nonverbal communication needs; 2) The need to develop social interaction skills and proficiencies; 3) The needs resulting from the child's unusual responses to sensory experiences; 4) The needs resulting from resistance to environmental change or change in daily routines; 5) The needs resulting from engagement in repetitive activities and stereotyped movements; 6) The need for any positive behavioral interventions, strategies, and supports to address any behavioral difficulties resulting from the autism spectrum disorder; and 7) Other needs resulting from the child's disability that impact progress in the general curriculum, including social and emotional development. |
| **Description of Corrective Action:** A training will be designed to address all of the elements of criterion SE 3A specifically in terms of addressing the 7 elements at each and every team meeting and documenting them in the IEP and N1. training will be done by sped coordinators |
| **Title/Role(s) of Responsible Persons:**Ned Pratt Director of PPS/Special Education & District Special Education Coordinators | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**Review of training materials, workshop agenda, workshop content, workshop signed attendance sheets, review of IEPs and N1s to assure that all of the elements of SE 3A are addressed and in compliance...these items will be shared with DESE |
| **Description of Internal Monitoring Procedures:** Monitoring will be ongoing and will include quarterly reviews of random IEPs & N1s at each level to assure that all elements of criterion SE 3A are properly implemented. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 3A Special requirements for students on the autism spectrum | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** Prior to developing the district's corrective actions, review the Department's guidance on IEP development for students identified with Autism Spectrum Disorder (ASD) at http://www.doe.mass.edu/sped/advisories/07\_1ta.html.By November 25, 2015, submit evidence of special education Team Chair training on how the IEP Team must consider and specifically address all the seven components related to students identified on the autism spectrum. This documentation will include the revised procedures, signed attendance sheets with name and role of staff member, agendas with name and role of presenter, and examples of training materials.By November 25, 2015, submit a narrative description of the corrective actions taken for each student identified in the Student Record Issues Worksheet. Please include documentation identified in the worksheet.By February 26, 2016, submit the results of an administrative review of student records for evidence that the IEP teams consider and specifically address the seven components related to students identified on the autism spectrum. This sample must be drawn from a cross-section of records across district schools/levels with Team meetings that occurred after all corrective actions have been implemented. Indicate the number of records reviewed; the number found to be compliant; an explanation of the root cause(s) for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance. \*Please note when conducting administrative monitoring, the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| **Criterion & Topic:** SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of records indicated that, upon reaching the age of 18, the school district does not always implement procedures to obtain consent from the student to continue his/her special education program. |
| **Description of Corrective Action:** A training will be held for those teachers who are involved in the transfer of parents’ rights. District forms, letters and policies will be the subject of the training. Training will be delivered by sped coordinators |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, PPS Director, and the sped coordinators serving students over the age of 16 years old. | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**Agendas, signed attendance sheets and program materials will be used as evidence. Additionally, the results of the quarterly random record reviews will also be used as evidence and will be submitted to DESE |
| **Description of Internal Monitoring Procedures:** Random quarterly reviews of parental transfer rights materials will be conducted and the results used to monitor the quality of said processes. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority | **Corrective Action Plan Status:** Partially Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:** Although the district indicated training will be conducted for teachers involved in the transfer of parental right at age of majority, the district did not indicate how it would track students reaching the age of majority in order to obtain consent to continue his/her special education program. |
| **Department Order of Corrective Action:**In addition to developing a procedure for obtaining consent, the district needs to develop an internal oversight and tracking system with periodic reviews to ensure that consent is being obtained from the student who has reached the age of majority in order to continue his/her special education program. |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit the procedure for those staff involved in the transfer of parental rights at age of majority to obtain consent from the student to continue his/her special education program for those students with sole or shared decision-making. Additionally, submit a description of the district's internal oversight and tracking system with periodic reviews with name(s)/ role(s) of designated person(s) ensuring that consent is obtained from the student reaching the age of majority to continue his/her special education program.By November 25, 2015, submit a narrative description of the corrective actions taken for each student identified in the Student Record Issues Worksheet. Please include documentation identified in the worksheet.By February 26, 2016, conduct an administrative review of a sample of records after implementation of all corrective actions for high school students both who turned 18 for evidence that the district has obtained the student's consent when he/she has shared or sole decision-making. For each review, indicate the number of high school records reviewed, the number found to be compliant, an explanation of the root cause for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance. \*Please note when conducting administrative monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). |
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| **Criterion & Topic:** SE 13 Progress Reports and content | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of student records indicated that the district does not always complete reports on the student's progress toward reaching the goals set in the IEP as often as general education parents are informed of the progress of students by report cards. |
| **Description of Corrective Action:** A training will be developed to address the SE Criterion #13, specifically the distribution of progress reports as often as report cards are distributed. Training will be delivered by the Sped coordinators |
| **Title/Role(s) of Responsible Persons:**Ned Pratt Director of PPS/Special Education and Special Education Coordinators | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**Review of training materials, signed attendance sheets, workshop agenda and content will be submitted to DESE |
| **Description of Internal Monitoring Procedures:** Monitoring will be ongoing. We will review a random sample of progress reports at the end of each report card distribution period to assure that progress reports are being sent home at or around the same time. We will also random review on esped to assure the same |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 13 Progress Reports and content | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit evidence of training to the Special Education Coordinators along with subsequent training to school staff on the completion of reports on the student's progress toward reaching the goals set in the IEP as often as general education parents are informed of the progress of students by report cards. This documentation will include the memoranda, signed attendance sheets with name and role of staff member, agendas with name and role of presenter, and examples of training materials.By February 26, 2016, subsequent to the implementation of all corrective actions, submit the results of an administrative review of student records for frequency of progress reports as often as general education parents are informed of the progress of students by report cards. Indicate the number of records reviewed at each level (preschool, elementary, middle, high and out-of-district), the number found to be compliant, an explanation of the root cause for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance. \*Please note when conducting administrative monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| **Criterion & Topic:** SE 18A IEP development and content | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of student records indicated that, in some instances, the IEP Team did not specifically address the skills and proficiencies needed to avoid and respond to bullying, harassment, or teasing for students whose disability affects social skills development, when the student's disability makes him or her vulnerable to bullying, harassment or teasing, or for students identified with a disability on the autism spectrum. |
| **Description of Corrective Action:** A training will be held for staff members from each building to address the skills and proficiencies needed to avoid and respond to bullying, harassment, or teasing for students whose disability affects social skills development, when the student's disability makes him or her vulnerable to bullying, harassment or teasing, or for students identified with a disability on the autism spectrum. Training will be done by sped coordinators |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, PPS director, and the Special education coordinators assigned to each building | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**Review of agendas, training materials related to bullying and harassment and signed attendance sheets as wells the results of the quarterly random audits will be used as evidence and submitted to DESE |
| **Description of Internal Monitoring Procedures:** Quarterly random reviews of eps/N1s to assure that the skills and proficiencies needed to avoid and respond to bullying, harassment and teasing for vulnerable students and those on the autism spectrum will be completed and the results shared with the director of PPS |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 18A IEP development and content | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** Prior to developing the district's staff training, review the Department's guidance at http://www.doe.mass.edu/bullying/considerations-bully.html.By November 25, 2015, submit evidence of training conducted for special education Team Chairs to ensure addressing the skills and proficiencies needed to avoid and respond to bullying, harassment, or teasing in student IEPs for students whose disability affects social skills development, when the student's disability makes him or her vulnerable to bullying, harassment or teasing, and students with ASD. Evidence of training will include an agenda, signed attendance sheets with name(s)/role(s) of attendees, and examples of training materials. By November 25, 2015, submit a narrative description of the corrective actions taken for each student identified in the Student Record Issues Worksheet. Please include documentation identified in the worksheet.By February 26, 2016 and subsequent to the implementation of corrective actions, submit the results of an administrative review of student records for consideration of vulnerability to bullying and the documentation and provision of skills and proficiencies to address or avoid bullying, harassment and teasing. The district must include students on the autism spectrum and students with social and communication needs in its record sample at each level. Indicate the number of records reviewed at each level (preschool, elementary, middle, secondary and out-of-district), the number found to be compliant, an explanation of the root cause for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance. Please identify which records meet the criteria for each group of students covered by this requirement. \*Please note when conducting administrative monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| **Criterion & Topic:** SE 18B Determination of placement; provision of IEP to parent | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Review of student records and staff interviews indicated that parents leave with Summary Notes and the Service Delivery Grid at the conclusion of the IEP Team meeting, but only receive one copy and two signature pages of the IEP and placement rather than two complete copies of the IEP. |
| **Description of Corrective Action:** A training will be developed for all special education staff and administrative assistants to review the requirement of two complete copies of the IEP paperwork being sent to parent/guardians each and every time. A sign off will be included in the special ed folder assuring that two copies of docs were sent home. Training will be delivered by sped coordinators |
| **Title/Role(s) of Responsible Persons:**Ned Pratt Director of PPS/Special Education and Special Education Coordinators | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**Workshop design and handout and workshop signed attendance sheets will be submitted as evidence. Random review of IEP paperwork sign off sheets will be conducted by special education coordinators to assure that admin staff/liaisons have sent two complete copies of the IEPs |
| **Description of Internal Monitoring Procedures:** A quarterly review of the relevant portion of the SE Criterion18B, namely sending two copies of the IEP paperwork home, will be completed by the special education coordinators. esped data will also be reviewed on a random basis. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 18B Determination of placement; provision of IEP to parent | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit a narrative of procedures with evidence of notice, e.g. email, to all special education staff and administrative assistants related to the provision of two (2) copies of the proposed IEP and placement to parents along with demonstrating the provision of the two (2) copies within Additional Information section and/or the N1. By February 26, 2016, submit the results of an administrative review of student records for evidence that two (2) copies of the proposed IEP are provided to parents. This sample must be drawn from a cross-section of records across district schools/levels with Team meetings that occurred after all corrective actions have been implemented. Indicate the number of records reviewed; the number found to be compliant; an explanation of the root cause(s) for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance. \*Please note when conducting administrative monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). |
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| **Criterion & Topic:** SE 20 Least restrictive program selected | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Student records indicated that IEP Teams do not consistently and appropriately justify the student's removal from the general education classroom and state why the removal is considered critical to the student's program or the basis for the removal. Additionally, the Team does not consistently indicate consideration given to any potential harmful effect on the student or on the quality of services that he or she needs. |
| **Description of Corrective Action:** A training on the use of the justification statement for removal will be conducted by the special education coordinators in each building. Exemplars will be shared and then the staff members throughout the district will use the same thoroughness in their development of the IEP document. Training will be done by the sped coordinators |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, PPS Director, and the Special Education Coordinators for each building | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**Agendas for the trainings, completed sign in sheets and training docs will be used as the evidence for completion and will be submitted to DESE |
| **Description of Internal Monitoring Procedures:** A sample of IEPs will be reviewed on a quarterly basis to assure that the removal statement is being addressed in a thoughtful and thorough manner. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 20 Least restrictive program selected | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, provide evidence of training related to the completion of the nonparticipation justification statement to appropriate special education staff. This documentation will include signed attendance sheets with name and role of staff member, agendas with name and role of presenter, and examples of training materials including examples of non-participation justification statements.By February 26, 2016, submit the results of an administrative review of student records for completion of the nonparticipation justification statement. This sample must be drawn from a cross-section of records across district schools/levels with Team meetings that occurred after all corrective actions have been implemented. Indicate the number of records reviewed; the number found to be compliant; an explanation of the root cause(s) for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance.\*Please note that when monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the record review; b) Date of the review; c) Name of person(s) who conducted the review, their roles(s), and their signature(s). |
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| **Criterion & Topic:** SE 24 Notice to parent regarding proposal or refusal to initiate or change the identification, evaluation, or educational placement of the student or the provision of FAPE | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Although a review of student records demonstrated that Notices of Proposed School District Action (N1) forms from the elementary schools are complete, records from both Samoset and Sky View Middle Schools and Leominster High School do not consistently include a description of the action proposed or refused by the school, an explanation of why the school proposed or refused to take the action, a description of any other options that the school considered and the reasons why those options were rejected, and a description of each evaluation procedure, test, record, report, or other factors the school used as a basis for the proposed or refused action. |
| **Description of Corrective Action:** A training regarding the use of the N1 form and it's importance as serving as written notice to parents will be conducted by the special education coordinators responsible for the middle schools and high school. Training will be conducted by the sped coordinators |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, PPS Director, and the Special Education Coordinators for Samoset, Skyview and LHS. | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**Agendas, program materials, signed attendance sheets will be used as the evidence for completion and will be submitted for review by DESE |
| **Description of Internal Monitoring Procedures:** A random quarterly review of N1 forms from Samoset, Skywiew and LHS will be conducted by the special education coordinators. The results will be submitted to the director of PPS for further training/action , if necessary |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 24 Notice to parent regarding proposal or refusal to initiate or change the identification, evaluation, or educational placement of the student or the provision of FAPE | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** Please review the Department's example of an appropriately developed Notice of Proposed School District Action (N1) form available at http://www.doe.mass.edu/sped/advisories/01\_4sample.pdf prior to the district's corrective actions.By November 25, 2015, submit training to appropriate special education staff at Samoset and Skyview Middle Schools, and Leominster High School, related to the proper completion of its Notice of Proposed School District Action Form (N1) form, including summarizing the district's proposed action; the reason why the district is proposing to take action; any rejected options the team considered; the evaluation procedures, test, record or report used as the basis for the proposed action; other factors relevant to the school district's decision; and recommended next steps. Evidence of training will include training agenda, attendance sheet with name(s)/role(s), copies of the materials presented and name/role of presenter. By February 26, 2016, submit the results of an administrative review of student records for Notice of the Proposal to Act or Refusal to Act (N1) form. This sample must be drawn from a cross-section of records for students registered at Samoset and Skyview Middle Schools, and Leominster High School with Team meetings that occurred after all corrective actions have been implemented. Indicate the number of records reviewed; the number found to be compliant; an explanation of the root cause(s) for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance.\*Please note when conducting administrative monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). |
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| **Criterion & Topic:** SE 29 Communications are in English and primary language of home | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of student records indicated that while some special education documents are translated when the family's primary language is other than English, the district does not consistently translate special education documents such as IEPs, progress reports, notices, and assessment summaries into the primary language of the home. |
| **Description of Corrective Action:** The district will use our current in-district translators for Spanish and Portuguese documents to assure that all required documents are translated to a family's primary language. The district will use our esped program to translate all documents in the lower incidence languages. |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, Director of Pupil Personnel Services & the Special Education Coordinators for each school | **Expected Date of Completion:**01/01/2016 |
| **Evidence of Completion of the Corrective Action:**Quarterly review of sample translated documents done in-house and a sample review of sped docs that are translated. Results of the reviews to be shared with DESE |
| **Description of Internal Monitoring Procedures:** Continued use of our translators and sped translation services to assure that all docs are translated into the family's primary language. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 29 Communications are in English and primary language of home | **Corrective Action Plan Status:** Partially Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:** The district proposed the continued use of in-district translators for Spanish and Portuguese documents and will use their eSped program to translated all documents in the lower incidence languages; however, the district did not indicate how staff will be trained on the use of eSped program to ensure that between in-district translators and eSped, that all required documents are translated to a family's primary language and plans for periodic administrative oversight. |
| **Department Order of Corrective Action:**The district needs to develop procedures including plans for periodic administrative oversightand train staff to ensure that special education documents such as IEPs, progress reports, notices, and assessment summaries are translated into the primary language of the home. |
| **Required Elements of Progress Report(s):** By November 25, 2016, the district will provide a narrative description of the updated procedures, including administrative oversight, related to the translation of special education documents such as IEPs, progress reports, notices, and assessment summaries into the primary language of the home as indicated by the Home Language Survey. Additionally, provide evidence of staff training on these procedures, which will include a training agenda, signed attendance sheets and copies of the materials presented.By November 25, 2015, submit a narrative description of the corrective actions taken for each student identified in the Student Record Issues Worksheet. Please include documentation identified in the worksheet.By February 26, 2016, submit the results of an administrative review of a sample of student records across all district levels subsequent to all corrective actions for evidence of the translation of special education documents including IEPs, progress reports, notices, and assessment summaries into the primary language of the home. Indicate the number of records reviewed at each level (preschool, elementary, middle, high and out-of-district), the number found to be compliant, an explanation of the root cause for any continued noncompliance and a description of additional corrective actions taken by the district to address any identified noncompliance. \*Please note when conducting administrative monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the records reviewed; b) Date of the review; c) Name of person(s) who conducted the review, with their role(s) and signature(s). |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** SE 51 Appropriate special education teacher licensure | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of district documents and staff interviews indicated that one individual at Northwest Elementary School who designs and provides direct special education services described in IEPs is not appropriately licensed. |
| **Description of Corrective Action:** The staff member is no longer employed in that role |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, Director of Pupil Personnel Services | **Expected Date of Completion:**10/01/2015 |
| **Evidence of Completion of the Corrective Action:**Review of staff roster and staff assignments for Northwest Elementary School |
| **Description of Internal Monitoring Procedures:** Systemic review of all special education teachers on a quarterly basis to assure that all special education teachers are appropriately licensed |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 51 Appropriate special education teacher licensure | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Corrected |
| **Basis for Decision:** The district reported that the individual staff member who was not appropriately licensed is no longer employed in the role. Additionally, the district will implement a systemic review of all special education teacher on a quarterly basis to ensure all are appropriately licensed. |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):**  |
| **Progress Report Due Date(s):**  |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** SE 55 Special education facilities and classrooms | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Observation, class schedules, and staff interviews at Northwest Elementary School indicated that throughout the day, concurrent instruction takes place within room C-10 for students receiving special education resource services. Although the 1st -3rd grade classes and 4th-5th grade classes are separated by a room divider, this divider is short, which creates visual and auditory distractions. Observations also revealed that Southeast Elementary School expanded its ABA program from one classroom to two classrooms, separated now by grade levels K-2 and 3-5. However, the location of the grades 3-5 classroom is at the end of a corridor off the grades K-1 wing and across from the custodial engineer's work room. This classroom location separates these students from similar-aged typical peers and from the general life of the school. Additional observations indicated that some district classrooms are identified with stigmatizing signage as a special education program, e.g. the Life Skills at the high school is labeled "Life Skills" and the Occupational Therapy/Physical Therapy room at Southeast Elementary School is labeled "OT/PT." |
| **Description of Corrective Action:** The classrooms at Northwest Elementary School will be separated through the installation of a full sound deflecting divider. The ABA classroom that is situated at the end of the custodial corridor will be moved to a more inclusive part of the building. All stigmatizing signing will be replaced with inclusive type appropriate signage. |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, Director of Pupil Personnel Services, and the Special Education Coordinators | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**The special Education Coordinators in each building will document these actions through submittal of an updated building layout plan which indicates the location of the classrooms at SE. Pictures and inspections of the other area for appropriate signage and full divider will be conducted and submitted by the special education coordinators |
| **Description of Internal Monitoring Procedures:** As stated, Special education coordinators will submit initial reports of the items described above. Special Education Coordinators will conduct quarterly inspections of all elements contained in this SE to assure that the special education facilities, classrooms and signage are appropriate and inclusive. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 55 Special education facilities and classrooms | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, the district will submit a written statement of assurance from the Superintendent and Principals of Northwest Elementary School, Southeast Elementary School, and Leominster High School ensuring compliance on the district’s proposed corrective actions. By February 26, 2016 the Department will conduct an on-site verification visit to ensure that the classrooms at Northwest Elementary School will be separated through the installation of a full sound deflecting divider. The ABA classroom at Southeast Elementary that is situated at the end of the custodial corridor will be moved to a more inclusive part of the building. All stigmatizing signage at Leominster High School and Southeast Elementary School will be replaced with inclusive type appropriate signage. |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 7 Information to be translated into languages other than English | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that the district has translated many of its important school documents into Spanish, the major language spoken by parents whose primary language is not English; however, staff interviews indicated that the district has not developed a system for translating report cards, or establishing a system of oral interpretation to assist parents/guardians, including those who speak low-incidence languages. |
| **Description of Corrective Action:** The District will develop a system for translating reports cards and oral interpretation for all languages. We will investigate and contract with one of the medically based translation/interpretation companies for all of our low incidence interpretations using the live medical model (immediate availability of interpreters) and contract with the company to translate our report cards and other necessary documents |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, Director of Pupil Personnel Services & Michael Gary, ELL Director | **Expected Date of Completion:**03/30/2016 |
| **Evidence of Completion of the Corrective Action:**Documents will be sent to DESE which show that we are translating the report cards into every language required and also interpreting for our low incidence languages |
| **Description of Internal Monitoring Procedures:** A random sample of our documents in languages other than Spanish will be completed on a quarterly basis to determine if they are being translated on a timely basis. We will also do the same quarterly review for translation requests and the use of the medical model translation company |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 7 Information to be translated into languages other than English | **Corrective Action Plan Status:** Partially Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:** Although the district proposed a means of developing a system for translating report cards and oral interpretation for all languages, they did not indicate a system for identifying any students/parents/guardians that request or require translation or oral interpretation of important documents. |
| **Department Order of Corrective Action:**Develop procedures within each school principal to monitor the identification of parents/guardians who request translation or interpretation of important documents on the Home Language Survey, along with a procedures for translating important documents or a system for providing oral interpretation, when indicated. |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit evidence of newly developed procedures with evidence of dissemination to all school principals to ensure parents whose primary language is not English receive translations and interpretations as needed. Also submit a narrative description of the district's oversight and tracking system to document oral interpretation and written translation, along with evidence of its implementation.By February 26, 2016, submit samples of translated report cards and tracking log(s) for translations. |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 9 Hiring and employment practices of prospective employers of students | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that while the district requires employers recruiting at the school to sign a statement that the employer complies with applicable federal and state laws prohibiting discrimination in hiring or employment practices, the statement does not include the protected category of "gender identity." |
| **Description of Corrective Action:** The required statement for all district employers that assures that the employer complies with applicable federal and state laws prohibiting discrimination in hiring or employment practices will be revised to include the protected category of "gender identity." |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, Director of Pupil Personnel Services | **Expected Date of Completion:**12/01/2015 |
| **Evidence of Completion of the Corrective Action:**The revised document will be sent to DESE for their review and will be used by the district moving forward |
| **Description of Internal Monitoring Procedures:** An annual review of any document assuring that the employer complies with applicable federal and state laws prohibiting discrimination in hiring or employment practices will be completed and any necessary updates will be added |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 9 Hiring and employment practices of prospective employers of students | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit a copy of the updated employer recruitment statement prohibiting discrimination in hiring or employment practices that now includes "gender identity." Also submit evidence of dissemination and training for staff on the updated nondiscrimination statement with the added category of "gender identity".By February 26, 2016, submit evidence of updated nondiscrimination statement with the added category of "gender identity" signed by prospective employers recruiting at the school. |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that written materials do not include "national origin" or "gender identity" as protected categories regarding annual and continuous notice concerning nondiscrimination. |
| **Description of Corrective Action:** School district documents will be reviewed to assure that the terms "national origin" and "gender identity" are included in all annual and continuous notices concerning nondiscrimination. |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, Pupil Personnel Services Director | **Expected Date of Completion:**12/01/2015 |
| **Evidence of Completion of the Corrective Action:**Relevant nondiscrimination annual and continuous notices will be forward to DESE for their review. |
| **Description of Internal Monitoring Procedures:** Annual review of all written materials as they pertain to protected categories regarding annual and continuous notice concerning nondiscrimination; any discrepancies will re revised and updated |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit updated written materials regarding annual and continuous notice concerning nondiscrimination that include the protected categories of "national origin" and "gender identity." |
| **Progress Report Due Date(s):** 11/25/2015 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 16 Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | **CPR Rating:** Not Implemented |
| **Department CPR Findings:** Document review and staff interviews indicated that the district does not have a process in place to send former students who have not yet earned their competency determination and who have not transferred to another school annual written notice for two years to inform them of the availability of publicly funded post-high school academic support programs and to encourage them to participate in those programs. |
| **Description of Corrective Action:** The District will put a process in place to send former students who have not yet earned their competency determination and who have not transferred to another school annual written notice for two years to inform them of the availability of publicly funded post-high school academic support programs and to encourage them to participate in those programs. This process will include not only the written notice, but a follow up call to the most recent email and cell phone numbers in our X2 database. |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, PPS Director, Mary Wagner, LHS Sped Coordinator, and Chris Lord, LHS Principal | **Expected Date of Completion:**03/01/2016 |
| **Evidence of Completion of the Corrective Action:**A report will be generated annually to determine how many eligible students fall into this category and how many were actually able to be contacted, along with their noted responses. This report will be shared with DESE. |
| **Description of Internal Monitoring Procedures:** A yearly review of the process to inform students of the availability of publicly funded post-high school academic support programs and to encourage them to participate in those programs. The District will share these results with all relevant internal parties to assure that this process remains active and vibrant |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 16 Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** Prior to the development of the district's corrective action, please review information for School Districts about Required Notices Regarding Students who Leave High School without Graduating at http://www.doe.mass.edu/news/news.aspx?id=3051 along with amendments to M.G.L. c. 76, ss. 5, 18 (as amended by 2012, 222, Sec. 8 effective July 1, 2014; St. 1965, c. 741).By November 25, 2015, submit a copy of the letter to be sent to former students who have not yet earned their competency determination and who have not transferred to another school. Additionally, submit a narrative of the district's internal oversight and tracking system ensuring the district does send an annual written notice for a minimum of two years to former students who have not yet earned their competency determination and who have not transferred to another school to inform them of the availability of publicly funded post-high school academic support programs and encourage them to participate in those programs. Also submit evidence of dissemination to appropriate staff of this new district process which may include emails/trainings.By February 26, 2016, submit evidence of a sample of student letters that have gone to former students who have not yet earned their competency determination and who have not transferred to another school informing them of the availability of publicly funded post-high school academic support programs and encourage them to participate in those programs. |
| **Progress Report Due Date(s):** 11/25/201502/26/2016 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 18A School district employment practices | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that while some recruitment and employment documents included statements of nondiscrimination on the basis of race, color, national origin, sex, or disability, the Substitute Teaching Application was missing "sex" as a protected category from its nondiscrimination statement; the Paraprofessional Association document was missing "disability" and had "nationality" in lieu of the federally-approved language of "national origin". Additionally, the School Committee Personnel document included "handicap" in lieu of the federally-approved language of "disability". |
| **Description of Corrective Action:** The Substitute Teaching document will be revised to include "sex" as a protected category in its nondiscrimination statement; The Paraprofessional Association document will be edited to include "disability" and add "national origin" to align with the federally-approved language; the School Committee document will be revised to include the federally-approved language “disability", |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, PPS Director, Christine Silverman, Supt AA, Ann Pickering, HR AA | **Expected Date of Completion:**12/01/2015 |
| **Evidence of Completion of the Corrective Action:**A copy of the Substitute Teaching application, the Paraprofessional Association document and the School Committee document will be forwarded to DESE for their review and will be made available to all other parties. |
| **Description of Internal Monitoring Procedures:** The district will monitor all of the documents on an annual basis to assure that all state and federal government requirements are contained within said documents |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 18A School district employment practices | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit a sample of the updated Substitute Teaching document that includes the protected categories of "sex;" and "gender identity"; the updated Paraprofessional Association document that includes "disability" and "national origin"; and the School Committee Personnel document that includes the updated and federally approved language of "disability" in lieu of "handicap". |
| **Progress Report Due Date(s):** 11/25/2015 |

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| COORDINATED PROGRAM REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 21 Staff training regarding civil rights responsibilities | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that district training documents do not include the protected categories of "gender identity" or "sex" in its nondiscrimination statements. |
| **Description of Corrective Action:** All district training documents will be revised by the PPS director to include the protected categories of "gender identity" or "sex" in its nondiscrimination statements. |
| **Title/Role(s) of Responsible Persons:**Ned Pratt, Director of Pupil Personnel Services | **Expected Date of Completion:**01/01/2016 |
| **Evidence of Completion of the Corrective Action:**Submission of the training documents with the required changes for the protected categories of "gender identity" or "sex" in its nondiscrimination statements. |
| **Description of Internal Monitoring Procedures:** A yearly review of the training documents to assure that they are in line with these provisions as well as any other changes to the provisions that may be done |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 21 Staff training regarding civil rights responsibilities | **Corrective Action Plan Status:** Approved **Status Date:** 09/24/2015 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By November 25, 2015, submit updated district training documents that include the updated protected categories of "gender identity" or "sex" in its nondiscrimination statements. Provide evidence of dissemination to all appropriate staff members. |
| **Progress Report Due Date(s):** 11/25/2015 |