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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: Innovation Academy Charter (District)

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 05/06/2015.

**Mandatory One-Year Compliance Date:** **05/06/2016**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
| --- | --- | --- |
| SE 14 | Review and revision of IEPs | Partially Implemented |
| SE 18B | Determination of placement; provision of IEP to parent | 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 |
| CR 7B | Structured learning time | Partially Implemented |
| CR 9 | Hiring and employment practices of prospective employers of students | Partially Implemented |
| CR 10B | Bullying Intervention and Prevention | Partially Implemented |
| CR 12A | Annual and continuous notification concerning nondiscrimination and coordinators | Partially Implemented |
| CR 17A | Use of physical restraint on any student enrolled in a publicly-funded education program | Partially Implemented |

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| **Criterion & Topic:**  SE 14 Review and revision of IEPs | | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Student records indicated that annual IEP Team meetings were not consistently held on or before the anniversary date of the IEP. | | | |
| **Description of Corrective Action:**  Student Services staff will receive training in scheduling meetings before IEP anniversary dates, including training that annual meetings should not be scheduled past an anniversary date even at parent request unless there is a rare and extenuating circumstance. In this case, the reason for the delay should be documented in the N1 form. Staff training will include recommendations that families are contacted at least one month prior to the IEP expiration date. | | | |
| **Title/Role(s) of Responsible Persons:**  Aimee Voleti, Director of Student Services | | **Expected Date of Completion:**  01/30/2016 | |
| **Evidence of Completion of the Corrective Action:**  A roster of student IEP expiration dates and review dates. | | | |
| **Description of Internal Monitoring Procedures:**  The Director of Student Services will review the school's IEP database for annual review dates and will follow up with liaisons if reviews are not confirmed on the school's meeting calendar at least four weeks prior to the IEP expiration date. | | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | | |
| **Criterion:**  SE 14 Review and revision of IEPs | **Corrective Action Plan Status:** Approved  **Status Date:** 06/09/2015  **Correction Status:** Not Corrected | | |
| **Basis for Decision:** | | | |
| **Department Order of Corrective Action:** | | | |
| **Required Elements of Progress Report(s):**  By September 15, 2015, the charter will provide evidence of training of its newly developed tracking and monitoring system to student services staff on procedures related to scheduling meetings before IEP anniversary dates. Evidence of training will include training agenda, attendance sheet with name(s)/role(s), copies of the materials presented and name/role of presenter.  Subsequent to corrective actions, submit the results of an administrative review of student records for meeting required timelines for recurring IEP meetings. 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 charter to address any identified noncompliance. Submit this to the Department by January 15, 2016. \*Please note when conducting administrative monitoring the charter 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):**  09/15/2015  01/15/2016 | | | |

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| **Criterion & Topic:**  SE 18B Determination of placement; provision of IEP to parent | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  Although the charter school provides parents with a summary of the decisions and agreements reached and a service delivery grid at the conclusion of the IEP Team meeting, a review of student records and staff interviews indicated that proposed IEP and placement pages are not sent within the required two calendar weeks and in some cases exceeded four weeks. | | |
| **Description of Corrective Action:**  Student Services staff will receive training in IEP timelines and will also receive training in strategies for preparing IEPs to go home to families post meeting within two weeks. | | |
| **Title/Role(s) of Responsible Persons:**  Aimee Voleti, Director of Student Services | | **Expected Date of Completion:**  01/30/2016 |
| **Evidence of Completion of the Corrective Action:**  Staff sign in sheets and spreadsheet of IEP meeting dates and dates IEPs were sent home for signature. | | |
| **Description of Internal Monitoring Procedures:**  The Director of Student Services will maintain a spreadsheet of each IEP meeting date and the date IEPs are due to be sent home, liaisons responsible for writing IEPs will receive an email one week post meeting if an IEP has not been sent home for signature. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 18B Determination of placement; provision of IEP to parent | **Corrective Action Plan Status:** Approved  **Status Date:** 06/09/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Prior to training, please review SpEd Advisory found at http://www.doe.mass.edu/news/news.aspx?id=3180  By September 15, 2015 the charter will submit evidence of training to student services staff on its newly developed tracking and monitoring procedures to ensure proposed IEP and placement pages are sent to parents within two calendar weeks (when Summary Notes and Service Delivery Grid are presented at the conclusion of the Team meeting). Evidence of training will include training agenda, attendance sheet with name(s)/role(s), copies of the materials presented and name/role of presenter.  Subsequent to all corrective actions, submit the results of an administrative review of student records for immediate provision of the IEP/placement within two calendar weeks. 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 charter to address any identified noncompliance. Submit this to the Department on by January 15, 2016. \*Please note when conducting administrative monitoring the charter 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):**  09/15/2015  01/15/2016 | | |

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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:**  A review of student records demonstrated that although the charter school's Notice of Proposed School District Action (N1) forms summarize the following: the action proposed by the charter school; an explanation of the reason why the charter school proposed or refused to take the action; the evaluation procedures, test, record, report; and recommended next steps; the charter school's (N1) does not consistently provide: a description of any other options considered and the reasons why those options were rejected; or other factors the charter school used as a basis for the proposed or refused action. | | |
| **Description of Corrective Action:**  Student services liaisons who complete N1 forms will be trained in adequate and appropriate responses that document other actions considered by the school district as well as other information relevant to the school district's decision. | | |
| **Title/Role(s) of Responsible Persons:**  Aimee Voleti, Director of Student Services | | **Expected Date of Completion:**  01/30/2016 |
| **Evidence of Completion of the Corrective Action:**  A review of student records will show that completed N1 forms consistently provide a description of other options considered and rejected, as well as other factors the school used as basis for the proposed action. Staff sign in sheets and agendas from training sessions will also be provided. | | |
| **Description of Internal Monitoring Procedures:**  The Director of Student Services will review N1 forms completed by each student services liaison. | | |
| 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:** 06/09/2015  **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 available at http://www.doe.mass.edu/sped/advisories/01\_4sample.pdf prior to developing the charter school's corrective actions. By September 15, 2015, submit evidence of training to student services liaisons related to the proper completion of the Notice of Proposed School District Action Form (N1), specifically including a description of any other options considered and the reasons why those options were rejected, and other factors the charter school used as a basis for the proposed or refused action. 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 January 15, 2016, submit the results of an administrative review of student records for Notice of the Proposal to Act or Refusal to Act. This sample must be drawn from a cross-section of records across grade 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 charter school 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):**  09/15/2015  01/15/2016 | | |

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| **Criterion & Topic:**  CR 7B Structured learning time | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicated that the charter school does not require the core subject of physical education at the high school level, grades 9-12. Currently students may only elect to take physical education. | | |
| **Description of Corrective Action:**  A physical education teacher has been hired for the high school and the student program of study will be updated to reflect the school's physical education requirement. | | |
| **Title/Role(s) of Responsible Persons:**  Greg Orpen, Head of School | | **Expected Date of Completion:**  09/01/2015 |
| **Evidence of Completion of the Corrective Action:**  High school staff list with physical education teacher listed and the high school program of study and samples of high school student schedules. | | |
| **Description of Internal Monitoring Procedures:**  The high school principal will ensure that all student schedules comply with the physical education requirement. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 7B Structured learning time | **Corrective Action Plan Status:** Approved  **Status Date:** 06/09/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Prior to any corrective action, refer to the Department of Elementary and Secondary Education guidance on "Clarification of the Massachusetts Physical Education Requirements":  http://www.doe.mass.edu/news/news.aspx?id=649  By September 15, 2015, submit a copy of the Program of Study indicating the provision of physical education for four years (grades 9-12) along with the staffing name(s) for the physical education instructor(s), and samples of high school student schedules. Include a letter of assurance from the high school principal as to the implementation of this physical education requirement. | | |
| **Progress Report Due Date(s):**  09/15/2015 | | |

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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 and staff interviews indicated that the charter school's statement for prospective employers omits the protected categories of "color" and "national origin." | | |
| **Description of Corrective Action:**  High School student internship paperwork will be updated for next year so that mentor agreements will include the protected categories of color and national origin. | | |
| **Title/Role(s) of Responsible Persons:**  Greg Orpen, Head of School | | **Expected Date of Completion:**  09/01/2015 |
| **Evidence of Completion of the Corrective Action:**  High School student internship paperwork that is delivered to site mentors. | | |
| **Description of Internal Monitoring Procedures:**  Head of School will ensure that this paperwork is updated prior to the start of the school year. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 9 Hiring and employment practices of prospective employers of students | **Corrective Action Plan Status:** Approved  **Status Date:** 06/09/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By September 15, 2015, submit to ESE evidence of updated documents for prospective employers that include the protected categories of "color" and "national origin" in the charter's nondiscrimination statement. | | |
| **Progress Report Due Date(s):**  09/15/2015 | | |

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| **Criterion & Topic:**  CR 10B Bullying Intervention and Prevention | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicated that bullying intervention and prevention training does not occur for cafeteria staff or coaches. | | |
| **Description of Corrective Action:**  Cafeteria staff and all coaches (specifically those not members of our school day faculty/staff) will receive bullying intervention and prevention training. These staff members will be added to the school's list of staff who required to attend bullying intervention and prevention training. | | |
| **Title/Role(s) of Responsible Persons:**  Greg Orpen, Head of School | | **Expected Date of Completion:**  09/30/2015 |
| **Evidence of Completion of the Corrective Action:**  Staff sign in sheets and training materials from staff trainings. | | |
| **Description of Internal Monitoring Procedures:**  The Director of Athletics will maintain a list of coaching staff and ensure that all staff receive bullying intervention and training prior to the start of a sport. Staff sign in sheets from August and September professional development will be reviewed to ensure that cafeteria staff have been trained in the school's bullying intervention and prevention policies and procedures. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10B Bullying Intervention and Prevention | **Corrective Action Plan Status:** Approved  **Status Date:** 06/09/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By September 15, 2015, the charter school will submit evidence to ESE of training to staff, including cafeteria staff and coaches, on the Bullying Intervention and Prevention Plan. Evidence of training will include training agenda, attendance sheet with name(s)/role(s), copies of the materials presented and name/role of presenter. | | |
| **Progress Report Due Date(s):**  09/15/2015 | | |

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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 including the faculty handbook and internship program publication omit one or more of the following protected categories: "color;" "national origin;" "gender identity;" and "homelessness." Also, some documents indicated "physical" and "mental disability" rather than the protected category of "disability." | | |
| **Description of Corrective Action:**  Faculty handbook and internship paperwork will include all protected categories, and will list disability rather than physical and mental disability. | | |
| **Title/Role(s) of Responsible Persons:**  Greg Orpen, Head of School | | **Expected Date of Completion:**  09/01/2015 |
| **Evidence of Completion of the Corrective Action:**  Copies of the applicable section of the faculty handbook and the school's internship paperwork. | | |
| **Description of Internal Monitoring Procedures:**  The Head of School will ensure that these updates have been made to the faculty handbook and the school's internship paperwork as part of the school's summer updates to forms and handbooks. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **Corrective Action Plan Status:** Approved  **Status Date:** 06/09/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By September 15, 2015, submit evidence to ESE of the charter school's updated nondiscrimination statement within the faculty handbook and internship paperwork that include the added categories of "color;" "national origin;" "gender identity;" and "homelessness;" and "disability." | | |
| **Progress Report Due Date(s):**  09/15/2015 | | |

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| **Criterion & Topic:**  CR 17A Use of physical restraint on any student enrolled in a publicly-funded education program | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents and staff interviews indicated that the charter school does not conduct training on the use of physical restraint consistent with regulatory requirements for employees hired after the school year begins, within a month of their employment. | | |
| **Description of Corrective Action:**  The school will add restraint training to the new hire checklist used for all staff. | | |
| **Title/Role(s) of Responsible Persons:**  Greg Orpen, Head of School | | **Expected Date of Completion:**  01/30/2015 |
| **Evidence of Completion of the Corrective Action:**  Staff training sign in sheets and training agendas, the school's new hire checklist, a list of staff hired after the start of the 2015-2016 school year. | | |
| **Description of Internal Monitoring Procedures:**  New hire checklists will be monitored by our school business office to ensure that all new hires receive the appropriate training within 30 days of hire. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 17A Use of physical restraint on any student enrolled in a publicly-funded education program | **Corrective Action Plan Status:** Approved  **Status Date:** 06/09/2015  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  Prior to any corrective action, refer to the Department of Elementary and Secondary Education guidance on the use of physical restraint: http://www.doe.mass.edu/lawsregs/603cmr46.html?section=03.  By September 15, 2015, submit evidence of staff training within 30 days of employment related to the procedures regarding physical restraint. Evidence of training will include a copy of the updated new-hire checklist, training agenda, attendance sheet with name(s)/role(s), copies of the materials presented and name/role of presenter.  By January 15, 2016, submit evidence of physical restraint training conducted on any staff hired after the start of the 2015-2016 school year, ensuring that the business office is successfully monitoring the new-hire checklist and the provision of appropriate training within 30 days of hire. | | |
| **Progress Report Due Date(s):**  09/15/2015  01/15/2016 | | |