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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: Halifax

CPR Onsite Year: 2015-2016

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 09/28/2016.

**Mandatory One-Year Compliance Date:** **09/28/2017**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| 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 54 | Professional development | Partially Implemented |
| CR 3 | Access to a full range of education programs | Partially Implemented |
| CR 8 | Accessibility of extracurricular activities | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 12A | Annual and continuous notification concerning nondiscrimination and coordinators | Partially Implemented |
| CR 14 | Counseling and counseling materials free from bias and stereotypes | Partially Implemented |
| CR 17A | Use of physical restraint on any student enrolled in a publicly-funded education program | Partially Implemented |
| CR 18A | School district employment practices | Partially Implemented |
| CR 21 | Staff training regarding civil rights responsibilities | Partially Implemented |
| CR 24 | Curriculum review | Partially Implemented |

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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:** Review of student records indicated that the Notice of Proposed School District Action (N1) does not consistently include a description of each evaluation procedure, test, record or report the agency used as a basis for the proposed or refused action when the district is proposing an IEP following an initial evaluation or re-evaluation. |
| **Description of Corrective Action:** The administrator of special education will provide training to staff regarding the required information on the Notice of Proposed School District Action specific to including a description of each evaluation procedure, test, record or report the agency used as a basis for the proposed or refused action when the district is proposing an IEP following an initial evaluation or re-evaluation.The administrator of special education will provide samples of suggested language for the N1. |
| **Title/Role(s) of Responsible Persons:**Marie GrableAdministrator of Special Education | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Evidence of training to include monthly department meeting agendas, attendance sheets and record review of a sample of N1's following training. |
| **Description of Internal Monitoring Procedures:** The administrator of special education will meet monthly with special education staff and randomly review and provide feedback to staff regarding the sample of N1's reviewed within that month in an effort to ensure compliance with this criteria. |
| 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:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016 submit evidence of special education staff training for ensuring that the Notice of Proposed School District Action (N1) includes a description of each evaluation procedure, test, record or report the agency used as a basis for the proposed or refused action when the district is proposing an IEP following an initial evaluation or re-evaluation. This documentation should include an agenda, signed attendance sheet, name and role of presenter, and a sample of training materials. By December 14, 2016, provide clarification of the number of records the Special Education administrator will review as part of the district's internal monitoring processBy March 24, 2017, submit the results of an internal review of approximately 10-12 records of students from different grade levels conducted subsequent to implementation of all corrective actions. Provide a detailed narrative summary of the review including the number of records reviewed and the number with evidence of the Proposed School District Action (N1) that includes a description of each evaluation procedure, test, record or report the agency used as a basis for the proposed or refused action when the district is proposing an IEP following an initial evaluation or re-evaluation. If noncompliance is identified, report the specific actions taken to correct each individual student record, identify and report the root cause(s) of the ongoing non-compliance and a plan to remedy it. \*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):** 12/14/201603/24/2017 |

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| **Criterion & Topic:** SE 54 Professional development | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and staff interviews indicated that although the district provides a variety of training opportunities on special education laws, regulations, and local policies and procedures, the district does not ensure that all staff, specifically general education teachers and paraprofessionals, receive training on analyzing and accommodating diverse learning styles of all students in order to achieve an objective of inclusion in the general education classroom of students with diverse learning styles. |
| **Description of Corrective Action:** The administrator of special education, in collaboration with the superintendent and assistant superintendent, will provide training opportunities to ensure that all staff, specifically general education teachers and paraprofessionals, receive training on analyzing and accommodating diverse learning styles of all students in order to achieve an objective of inclusion in the general education classrooms for students with diverse learning styles. |
| **Title/Role(s) of Responsible Persons:**Marie GrableAdministrator of Special Education | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**The district will submit evidence of training (to include agendas, sign-in sheets, training materials) for general education teachers and paraprofessionals on analyzing and accommodating diverse learning styles of all students in order to achieve the objective of inclusion in the general education classrooms for students with diverse learning styles. |
| **Description of Internal Monitoring Procedures:** Regular and ongoing discussions with the administrative team regarding training opportunities for all staff will be conducted throughout the school year. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 54 Professional development | **Corrective Action Plan Status:** Approved **Status Date:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit evidence of training for general education teachers and paraprofessionals on analyzing and accommodating diverse learning styles of all students in order to achieve inclusion in the general education classroom of students with diverse learning styles. This documentation should include an agenda, signed attendance sheet, name and role of presenter, and a sample of training materials. |
| **Progress Report Due Date(s):** 12/14/2016 |

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| **Criterion & Topic:** CR 3 Access to a full range of education programs | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Although document review indicated that the district has a policy that ensures equal access to a full range of education programs for all students, regardless of race, color, sex, gender identity, religion, national origin, sexual orientation, or disability, this policy does not address the protected category of homelessness. |
| **Description of Corrective Action:** Policies will include the protected category of homelessness |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Provided policies and documents |
| **Description of Internal Monitoring Procedures:** Policies and documents will be reviewed with administration during admin meetings |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 3 Access to a full range of education programs | **Corrective Action Plan Status:** Approved **Status Date:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit a link to the 2016-2017 Student Handbooks on the district website, updated to include homelessness as a protected category in the district policy ensuring equal access to a full range of education programs. By December 14, 2016, submit evidence of staff training on the revised policy including an agenda, training materials that specify homelessness as a protected category, signed attendance sheets and the name and role of presenter. Please note that changes to McKinney-Vento will be effective as of October 1, 2016, resulting from the reauthorization of the Every Student Succeeds Act. Please see the Department's guidance on these changes at http://www.doe.mass.edu/mv/EduStability-ESSAupdates.pdf. |
| **Progress Report Due Date(s):** 12/14/2016 |

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| **Criterion & Topic:** CR 8 Accessibility of extracurricular activities | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that the district's policy to ensure equal access to extracurricular activities for all students, regardless of race, sex, gender identity, color, religion, national origin, sexual orientation and disability, does not address the protected category of homelessness. |
| **Description of Corrective Action:** Policies will include the protected category of homelessness |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Provided policies and documents |
| **Description of Internal Monitoring Procedures:** Policies and documents will be reviewed with administration during admin meetings |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 8 Accessibility of extracurricular activities | **Corrective Action Plan Status:** Approved **Status Date:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit a link to the updated 2016-2017 Student Handbooks on the district website that include homelessness as a protected category in the district policy ensuring equal access to extracurricular activities. |
| **Progress Report Due Date(s):** 12/14/2016 |

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| **Criterion & Topic:** CR 10A Student handbooks and codes of conduct | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that although the district has appropriate procedures in place for the discipline of students with disabilities, the disciplinary procedures, as set forth in the student code of conduct, do not include the following: 1) manifestation determination procedures for the suspension of students with disabilities that exceeds 10 consecutive school days or a pattern of suspensions that exceeds 10 cumulative days; and 2) procedures related to placement in an interim alternative educational setting and the school's continued obligation to provide educational services. Document review also indicated that the student code of conduct does not contain the procedural requirements applied to students not yet determined to be eligible for special education. In addition, a review of the student handbook indicated that the nondiscrimination policy consistent with M.G.L. c. 76, s. 5, affirming the school's non-tolerance for harassment based on race, color, national origin, sex, religion, or sexual orientation, or discrimination on those same bases, does not address gender identity as a protected category. Additionally, the student code of conduct does not contain disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred. |
| **Description of Corrective Action:** Student handbooks will be updated to include the following: 1) manifestation determination procedures for the suspension of students with disabilities that exceeds 10 consecutive school days or a pattern of suspensions that exceeds 10 cumulative days; and 2) procedures related to placement in an interim alternative educational setting and the school's continued obligation to provide educational services. The student handbook will also be updated to so that the student code of conduct contains the procedural requirements applied to students not yet determined to be eligible for special education. The handbook will also be updated to ensure that the nondiscrimination policy also has the protected category of gender identity listed. Lastly, the code of conduct will contain disciplinary measures that may be imposed if harassment or discrimination occurs. |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Document review |
| **Description of Internal Monitoring Procedures:** Document review with staff at staff meetings as reflected on meeting agendas |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Approved **Status Date:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit a link to the revised student handbook 2016-2017 on the district's web site. Revisions to the student handbook include: 1) manifestation determination procedures for the suspension of students with disabilities that exceeds 10 consecutive school days or a pattern of suspensions that exceeds 10 cumulative days; 2) procedures related to placement in an interim alternative educational setting and the school's continued obligation to provide educational services; 3) the student code of conduct contains the procedural requirements applied to students not yet determined to be eligible for special education; 4) the nondiscrimination policy consistent with M.G.L. c. 76, s. 5, affirming the school's non-tolerance for harassment based on race, color, national origin, sex, religion, or sexual orientation, or discrimination on those same bases, includes gender identity as a protected category; and 5) the student code of conduct includes disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred. By December 14, 2016, submit evidence of training for the revisions to the student handbook and code of conduct for administrators and staff including an agenda and signed attendance sheet, name and role of presenter and a sample of training materials. |
| **Progress Report Due Date(s):** 12/14/2016 |

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| **Criterion & Topic:** CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that the district's annual and continuous notification concerning nondiscrimination and coordinators does not include the name, office address, and phone number of the person currently designated to coordinate compliance under Section 504. |
| **Description of Corrective Action:** Documents have already been updated to include the name, office address, and phone number of the person currently designated to coordinate compliance under Section 504. The district will also revise the 2016-17 student handbook to identify the current Title IX and 504 coordinator(s). The district will also disseminate this information to staff and parents via the link to the revised handbook on the district's web site. |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Document review |
| **Description of Internal Monitoring Procedures:** Document review and submission of link for the handbook |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **Corrective Action Plan Status:** Partially Approved **Status Date:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:** Please note that the 2015-2016 student handbook uploaded under Additional Documents identifies the Title IX & 504 coordinator as then assistant superintendent Joy Blackwood (page 12). |
| **Department Order of Corrective Action:**Revise the 2016-2017 student handbook to identify the current Title IX & 504 coordinator(s). Disseminate this information to staff and parents via the link to the revised handbook on the district's web site. |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit a link to the revised 2016-2017 handbooks on the district web site with name, school address, and phone number identifying the current individual(s) responsible for coordinating compliance under Title IX and Section 504. |
| **Progress Report Due Date(s):** 12/14/2016 |

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| **Criterion & Topic:** CR 14 Counseling and counseling materials free from bias and stereotypes | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that although the district has a process to ensure that counseling and counseling materials are free from bias and stereotypes on the basis of race, color, sex, religion, national origin, sexual orientation, and disability, the protected categories of gender identity and homelessness are not addressed. |
| **Description of Corrective Action:** Counseling and counseling materials will be updated to include the protected categories of gender identity and homelessness. |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Document review |
| **Description of Internal Monitoring Procedures:** Document review with staff |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 14 Counseling and counseling materials free from bias and stereotypes | **Corrective Action Plan Status:** Approved **Status Date:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit a link to the updated 2016-2017 student handbooks with nondiscrimination statements that include gender identity and homelessness as protected categories. By December 14, 2016, submit evidence of counseling staff training on the revised policy including an agenda, training materials for counseling that specify gender identity and homelessness as protected categories, signed attendance sheets and the name and role of presenter. |
| **Progress Report Due Date(s):** 12/14/2016 |

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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:** Document review and staff interviews indicated that the district has not developed and implemented written restraint prevention and behavior support policy and procedures consistent with new regulations under 603 CMR 46.00 regarding appropriate responses to student behavior that may require immediate intervention. Document review indicated that program staff have been identified to serve as school-wide resources for the administration of restraint and provided with in-depth training on the use of physical restraint. |
| **Description of Corrective Action:** Implementation of procedures consistent with new regulations regarding appropriate responses to student behavior that may require immediate intervention. |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Document review and interviews |
| **Description of Internal Monitoring Procedures:** Staff meeting agendas |
| 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:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit the district's updated restraint prevention and behavior support policy and procedures based on the amended regulations, 603 CMR 46.00, that took effect January 2016. By December 14, 2016, submit evidence that the restraint and behavioral support policy has been approved by the School Committee. Evidence can include agendas and minutes of the School Committee. By December 14, 2016, submit evidence of training for all staff on the district's restraint prevention and behavior support policy and procedures that includes an agenda, signed attendance sheet, name and role of presenter and a sample of training materials. By December 14, 2016, submit evidence that the revised restraint and behavior support policy has been disseminated to families. Examples of such evidence include a memo or email indicating how the restraint prevention and behavior support policy is disseminated, a letter to families, or a link to a notice on the district's website. |
| **Progress Report Due Date(s):** 12/14/2016 |

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| **Criterion & Topic:** CR 18A School district employment practices | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicated that the district's notices for job vacancies do not consistently address the protected categories of race, color, national origin, sex or disability. |
| **Description of Corrective Action:** Documents will be updated to address the protected categories of race, color, national origin, sex, or disability. The district will also develop a nondiscrimination statement for employment listings that include race, color, gender identity, national origin, sex and disability. |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Document review |
| **Description of Internal Monitoring Procedures:** Documents have been updated to address the protected categories of race, color, national origin, sex, or disability. Submission of employment listings. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 18A School district employment practices | **Corrective Action Plan Status:** Partially Approved **Status Date:** 10/26/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:** The district employment forms did not include the protected category of gender identity. |
| **Department Order of Corrective Action:**Develop a nondiscrimination statement for employment listings that includes race, color, gender identity, national origin, sex and disability. Ensure that the district's human resources office has a nondiscrimination statement that addresses all required protected categories for all employment listings. |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit employment listings verifying that the nondiscrimination statement includes race, color, gender identity, national origin, sex and disability. |
| **Progress Report Due Date(s):** 12/14/2016 |

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| **Criterion & Topic:** CR 21 Staff training regarding civil rights responsibilities | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and staff interviews indicated that although the district provides in-service training for all school personnel at least annually regarding civil rights responsibilities, including the prevention of discrimination and harassment on the basis of students' race, color, sex, religion, national origin and sexual orientation and the appropriate methods for responding to discrimination and harassment in the school setting, this training does not address the protected category of gender identity. |
| **Description of Corrective Action:** In-service training for school personnel regarding Civil Rights will address the protected category of gender identity. |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Document review |
| **Description of Internal Monitoring Procedures:** Staff meeting agendas will be reviewed |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 21 Staff training regarding civil rights responsibilities | **Corrective Action Plan Status:** Approved **Status Date:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit evidence of training all school personnel on the updated civil rights responsibilities, including an agenda, signed attendance sheet, name and role of presenter, and the revised in-service training materials on civil rights responsibilities, demonstrating the addition of gender identity. |
| **Progress Report Due Date(s):** 12/14/2016 |

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| **Criterion & Topic:** CR 24 Curriculum review | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and staff interviews indicated that although individual teachers review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the bases of race, color, sex, religion, national origin and sexual orientation, the protected category of gender identity is not addressed in this process. |
| **Description of Corrective Action:** Review of educational materials will include the protected category of gender identity. |
| **Title/Role(s) of Responsible Persons:**Christine Pruitt/Assistant Superintendent | **Expected Date of Completion:**08/24/2017 |
| **Evidence of Completion of the Corrective Action:**Document review and interviews |
| **Description of Internal Monitoring Procedures:** Review documents with staff |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 24 Curriculum review | **Corrective Action Plan Status:** Approved **Status Date:** 11/07/2016 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By December 14, 2016, submit evidence of teacher training on the revised tools and methods to provide balance and context for any stereotypes depicted. This documentation will include the agenda, signed attendance sheet, name and role of the presenter, and the revised Textbook Evaluation Tool and Curriculum Tools with the added protected category of gender identity used as the basis of the training. |
| **Progress Report Due Date(s):** 12/14/2016 |