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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: Pembroke Public Schools

CPR Onsite Year: 2016-2017

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 06/05/2017.

**Mandatory One-Year Compliance Date:** **06/05/2018**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
| --- | --- | --- |
| SE 20 | Least restrictive program selected | Partially Implemented |
| CR 8 | Accessibility of extracurricular activities | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 16 | Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | Partially Implemented |
| CR 18A | School district employment practices | Partially Implemented |
| ELE 11 | Equal Access to Academic Programs and Services | Partially Implemented |

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| **Criterion & Topic:**  SE 20 Least restrictive program selected | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of student records and interviews indicated that if a student is removed from the regular education classroom at any time, the Team does not always consider any potential harmful effects on the student and does not consistently state why the removal is critical to the student's program and the basis for its conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily. | | |
| **Description of Corrective Action:**  A review of student records indicated that if a student is removed from the regular education classroom at any time, the Team does not always consider any potential harmful effects on the student and does not consistently state why the removal is critical to the student's program and the basis for its conclusion that education of the student in a less restrictive environment, with the use of supplementary aids and services, could not be achieved satisfactorily. The special education team chairs under the direction of the Director of Student Services will review 10 IEPs at each building to come up with a sampling of Justification Statements. The regulation will be reviewed for understanding and training at a Team Chair meeting held by the Director of Student Services. At this meeting the 10 IEPs from each building will be reviewed as a group. Exemplars will be created to use as a guidance for the team chairs, and subsequently the special education staff in each building. Building level training will occur by team chairs to all special education staff. Prior to IEPs being signed by the team chairs and sent to parents, specific review of this statement will be reviewed by the chairs for compliance. A second review will occur by the Director of Student Services. At a team chair meeting in December, chairs will bring 5 samples of IEPs containing appropriate justification statements for review by the group. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Student Services, Special Education Team Chairs | | **Expected Date of Completion:**  12/30/2017 |
| **Evidence of Completion of the Corrective Action:**  Samples of least restrictive program/justification statements will be submitted that include why the student was removed from the regular education classroom and why the removal is critical to the student's program and why the service cannot be conducted in a less restrictive environment even with the use of supplementary aids and services. | | |
| **Description of Internal Monitoring Procedures:**  Ongoing monitoring by team chairs and the Director of Student Services of IEPs including Criterion #20 to ensure compliance. Samples of this statement will be discussed and reviewed twice a year in a team chair meeting conducted by the Director of Student Services. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  SE 20 Least restrictive program selected | **Corrective Action Plan Status:** Approved  **Status Date:** 06/29/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By September 29, 2017 submit evidence of special education staff training (agenda, dated attendance list, with staff role and materials used). By October 30, 2017 submit results of internal review of a sample of 5-8 student records across grade levels. Indicate the number of records reviewed at each level, the number found to be compliant, an explanation of the root causes for any continued non-compliance and description of the additional corrective actions taken by the district to address the non-compliance. \*Please note that when conducting internal 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):**  09/29/2017  10/30/2017 | | |

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| **Criterion & Topic:**  CR 8 Accessibility of extracurricular activities | | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that the district's policy regarding equal access to extracurricular activities does not contain all protected categories. Specifically, the policy is missing the protected categories of gender identity, sexual orientation, disability, and homelessness. | | | |
| **Description of Corrective Action:**  A review of documents indicated that the district's policy regarding equal access to extracurricular activities does not contain all protected categories. Specifically, the policy is missing the protected categories of gender identity, sexual orientation, disability, and homelessness. The policy will be reviewed by the Superintendent and Policy Sub Committee of the School Committee. Language in all handbooks will be reviewed by building principals and the Director of Student Services. Notification on the correct language will be issued to all building principals and School Committee members of the Policy Sub Group. The policy and handbooks will be revised to reflect the required language regarding all protected categories. | | | |
| **Title/Role(s) of Responsible Persons:**  Director of Student Services and Superintendent | | **Expected Date of Completion:**  09/30/2017 | |
| **Evidence of Completion of the Corrective Action:**  Policy and handbook language will be submitted | | | |
| **Description of Internal Monitoring Procedures:**  The policy subcommittee of the School Committee under the Superintendent will continue to monitor and regularly review policy language to ensure all regulations are being abided by within the policy manual. The Director of Student Services will review handbooks on an annual basis to ensure all regulations are being followed, including any updates and specifically the language around protected categories. | | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | | |
| **Criterion:**  CR 8 Accessibility of extracurricular activities | **Corrective Action Plan Status:** Partially Approved  **Status Date:** 06/29/2017  **Correction Status:** Not Corrected | | |
| **Basis for Decision:**  The district did not include dissemination of the updated policy to students, teachers and families in the corrective action plan. | | | |
| **Department Order of Corrective Action:**  Include dissemination of the updated policy to students teachers and families in the corrective action. | | | |
| **Required Elements of Progress Report(s):**  By September 29, 2017 submit a link to the updated non-discrimination policy on the district website assuring equal access to extracurricular activities and evidence that the students, teachers and families have been notified of the policy updates. Examples of such evidence include a memo or email to families or a link to a notice on the district's website. | | | |
| **Progress Report Due Date(s):**  09/29/2017 | | | |

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| **Criterion & Topic:**  CR 10A Student handbooks and codes of conduct | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that although the middle and high school handbooks contain a non-tolerance statement for harassment, they do not contain language that specifically affirms non- tolerance for harassment based on the protected categories of race, color, national origin, sex, gender identity, religion, or sexual orientation, or discrimination on those same bases. | | |
| **Description of Corrective Action:**  A review of documents indicated that although the middle and high school handbooks contain a non-tolerance statement for harassment, they do not contain language that specifically affirms non- tolerance for harassment based on the protected categories of race, color, national origin, sex, gender identity, religion, or sexual orientation, or discrimination on those same bases. Language in all handbooks will be reviewed by building principals and the Director of Student Services. Notification on the correct language will be issued to all building principals. The handbooks will be revised to reflect the required language regarding non tolerance for harassment based on the protected categories of race, color, national origin, sex, gender identity, religion, or sexual orientation, or discrimination on those same bases. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Student Services, Building Principals, Superintendent | | **Expected Date of Completion:**  09/01/2017 |
| **Evidence of Completion of the Corrective Action:**  Handbook language will be submitted. | | |
| **Description of Internal Monitoring Procedures:**  The Director of Student Services will review handbooks on an annual basis to ensure all regulations are being followed, including any updates and specifically the language around non tolerance for harassment based on protected categories. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Partially Approved  **Status Date:** 06/29/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:**  The district did not include dissemination of the updated policy to students and families in the corrective action plan. | | |
| **Department Order of Corrective Action:**  Include dissemination of the updated policy to students and families in the corrective action. | | |
| **Required Elements of Progress Report(s):**  By September 29, 2017 submit a link to the updated 2017-2018 Student Handbooks for both middle school and high school on the district's website and evidence of dissemination staff and families. Examples of such evidence include a memo or email indicating how the Handbooks are disseminated, a letter to families, or a link to a notice on the district's website. | | |
| **Progress Report Due Date(s):**  09/29/2017 | | |

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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:**  Partially Implemented |
| **Department CPR Findings:**  A review of documents indicated that the district does not provide written notice with all required components to students age 16 or over who have left school without receiving a diploma, certificate of attainment, or certificate of completion. | | |
| **Description of Corrective Action:**  An internal review of the procedures for notifying students age 16 or over about leaving school without a high school diploma or certificate were reviewed. It was discovered that our letter was missing some of the required regulation language. It was concluded that administrators at the secondary level required a review of the regulation. The Director of Student Services and Superintendent will train/review the regulation and process with the High School Principal and Director of Guidance who will then in turn train other appropriate staff as needed. The letter to the student/parents will be revised to include all required content. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Student Services, High School Principal, Director of Guidance, Superintendent | | **Expected Date of Completion:**  09/01/2017 |
| **Evidence of Completion of the Corrective Action:**  Samples (2) of written notification to include all required components of the regulation | | |
| **Description of Internal Monitoring Procedures:**  The Superintendent and Director of Student Services will be given a copy of each letter that is issued from the high school to review necessary procedures are being followed. | | |
| 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:** 06/29/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By September 29, 2017 submit a copy of the updated notice sent to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion updated to include all the required elements. | | |
| **Progress Report Due Date(s):**  09/29/2017 | | |

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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 the district's employment practices do not address all protected categories. Specifically, the district's employment policy and job postings are missing the protected category of sex. | | |
| **Description of Corrective Action:**  A review of documents indicated that the district's employment practices do not address all protected categories. Specifically, the district's employment policy and job postings are missing the protected category of sex. The Human Resources Manager under the direction of the Superintendent and Policy Sub Committee of the School Committee will review and revise both the employment policy and job posting procedures. The web based system used for job postings, School Spring, will be edited to include the protected category of "sex". | | |
| **Title/Role(s) of Responsible Persons:**  Director of Student Services, Superintendent, Human Resources Manager | | **Expected Date of Completion:**  09/30/2017 |
| **Evidence of Completion of the Corrective Action:**  Employment Policy and samples of job postings will be submitted. | | |
| **Description of Internal Monitoring Procedures:**  The district will annually review policies under the direction of the Policy Sub Committee of the School Committee and job postings will also be reviewed on a regular basis to ensure compliance with this regulation. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  CR 18A School district employment practices | **Corrective Action Plan Status:** Approved  **Status Date:** 06/29/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By September 29, 2017, submit the updated district's employment policy with the added protected category of sex, along with samples of job notices and web site links where the employment policy is posted. | | |
| **Progress Report Due Date(s):**  09/29/2017 | | |

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| **Criterion & Topic:**  ELE 11 Equal Access to Academic Programs and Services | | **CPR Rating:**  Partially Implemented |
| **Department CPR Findings:**  A review of records and interviews indicated that students at the high school level do not receive credit for English learner education classes. | | |
| **Description of Corrective Action:**  A review of the Program of Studies for the high school indicated that students at the high school level do not receive credit for English learner education classes. Communication between the Director of Guidance, Assistant Superintendent of Curriculum and Instruction, Secondary ELL Teacher, High School Principal and the Director of Student Services will occur to review other semester long course requirements and grading procedures. A course description will be created to reflect the course work and credit. The program of studies will be revised to include this course. Credit will be given to students who enroll in an ELL education class. | | |
| **Title/Role(s) of Responsible Persons:**  Director of Student Services, Secondary ELL Teacher, Director of Guidance, Assistant Superintendent | | **Expected Date of Completion:**  09/01/2017 |
| **Evidence of Completion of the Corrective Action:**  Program of Studies Course Description | | |
| **Description of Internal Monitoring Procedures:**  An annual review of the Program of Studies will occur to ensure all high school level classes are providing appropriate credit. | | |
| CORRECTIVE ACTION PLAN APPROVAL SECTION | | |
| **Criterion:**  ELE 11 Equal Access to Academic Programs and Services | **Corrective Action Plan Status:** Approved  **Status Date:** 06/30/2017  **Correction Status:** Not Corrected | |
| **Basis for Decision:** | | |
| **Department Order of Corrective Action:** | | |
| **Required Elements of Progress Report(s):**  By September 29, 2017 submit a revised program of studies course description for 2017- 2018 school year including credit earned upon successful completion at the high school for each course including English learner education classes. | | |
| **Progress Report Due Date(s):**  09/29/2017 | | |