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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: Petersham

CPR Onsite Year: 2017-2018

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 02/09/2018.

**Mandatory One-Year Compliance Date:** **02/09/2019**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
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| SE 11 | School district response to parental request for independent educational evaluation | Partially Implemented |
| SE 20 | Least restrictive program selected | Partially Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 10B | Bullying Intervention and Prevention | Partially Implemented |
| CR 10C | Student Discipline | 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 |
| CR 25 | Institutional self-evaluation | Not Implemented |

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| **Criterion & Topic:** SE 11 School district response to parental request for independent educational evaluation | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review and interviews indicate that the district procedures for extending the right to a publicly funded independent educational evaluation (IEE) is for 16 months from the date of the evaluation with which the parent disagrees; however, this timeline applies only if cost-shared or funded for state wards or for students receiving free or reduced cost lunch. The procedures also require that requests for an IEE be in writing, which is not a requirement under the federal and state special education regulations. |
| **Description of Corrective Action:** The Director of Special Services and the Supervisor of Special Services reviewed current documents related to the School Districts response to parental request for an independent educational evaluation, determined the areas in which the district was out of compliance, and made the appropriate adjustments. The new document will be reviewed by the building principal and the special education administrative assistant no later than August 15, 2018. |
| **Title/Role(s) of Responsible Persons:**Rebecca Phillips, Director of Special ServicesTaryn Dery, Supervisor of Special Services | **Expected Date of Completion:**08/30/2018 |
| **Evidence of Completion of the Corrective Action:**1) Updated procedures for extending the right to a publicly funded independent educational evaluation. 2) Signature sheet from review meeting. |
| **Description of Internal Monitoring Procedures:** The Director of Special Services will schedule a review meeting to ensure that the building principal and the special education administrative assistant reviews and understands the updated IEE procedures. She will collect and submit signatures for this meeting. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 11 School district response to parental request for independent educational evaluation | **Corrective Action Plan Status:** Approved **Status Date:** 04/27/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 14, 2018, submit the district procedures for conducting independent educational evaluations (IEE) that includes the state provision for extending the right to a publicly funded IEE for 16 months from the date of the evaluation with which the parent disagrees for students only if cost-shared or funded for state wards or for students receiving free or reduced cost lunch. For all other students, the federal provision holds that there is no time limit on the request for an IEE. Also, the district's procedures may not include a requirement that requests for an IEE be in writing.By September 14, 2018, provide evidence (agenda and sign-in sheet) that appropriate staff have been informed of the amended procedures. |
| **Progress Report Due Date(s):** 09/14/2018 |

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| **Criterion & Topic:** SE 20 Least restrictive program selected | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Student record review and interviews indicate that if a student is removed from the general education classroom at any time, the Team does not consistently state why the removal is considered 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:** Professional development training will be scheduled with all special education staff to review the CPR findings regarding the teams requirement to state why a students removal from the general education setting is considered critical to the students programming. Case studies will be provided and staff will have the opportunity to develop justification statements that meet these requirements. Training will occur no later than September 15, 2018. Following training, staff will complete justification statements on IEP's and these will be reviewed by the Supervisor of Special Services. Feedback and further training will be provided as needed. |
| **Title/Role(s) of Responsible Persons:**Rebecca Phillips, Director of Special ServicesTaryn Dery, Supervisor of Special Services | **Expected Date of Completion:**09/15/2018 |
| **Evidence of Completion of the Corrective Action:**1) Agenda from scheduled training2) Sign-in Sheet from scheduled training |
| **Description of Internal Monitoring Procedures:** The Director will schedule the training by September 15, 2018. The Supervisor will monitor all IEPs that are developed and approved then to be mailed to parents. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 20 Least restrictive program selected | **Corrective Action Plan Status:** Approved **Status Date:** 04/27/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 14, 2018, submit evidence (agenda, attendance sheet, materials) of staff training on the procedures developed to ensure that if a student is removed from the general education classroom at any time, the Team consistently states why the removal is considered 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.By December 14, 2018, submit the results of a review of student records where Team meetings were held after staff training, to ensure the non-participation justification statement in the IEP is complete. Please include: 1. The number of records reviewed; 2. The number of records in compliance; 3. For any records not in compliance, determine the root cause; and 4. The specific corrective actions taken to remedy the non-compliance. \* Please note 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 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):** 09/14/201812/14/2018 |

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| **Criterion & Topic:** CR 10A Student handbooks and codes of conduct | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicates that the district's student handbook and code of conduct do not contain procedures to ensure due process in disciplinary proceedings (see CR 10C); discipline of students with special needs; discipline of students with Section 504 Accommodation Plans; a non-discrimination statement that addresses all protected categories; and procedures for accepting, investigating and resolving complaints alleging discrimination or harassment. |
| **Description of Corrective Action:** By August 15, 2018 the building principal will collaborate with Middle and High School principals to review the district handbook and code of conduct pertaining to ensuring due process in disciplinary proceeding, discipline of student with special needs, disciple of students with 504 accommodation plans, in addition to, reviewing non-discrimination statements and procedures for accepting, investigating and resolving complaints alleging discrimination or harassment. By September 15, 2018 the handbook will be updated to include appropriate language and required information. The handbook will be reviewed by the school council no later than October 2018 and and then voted in by the school committee no later than November of 2018. |
| **Title/Role(s) of Responsible Persons:**Joanne Menard, Building PrincipalRebecca Phillips, Director of Special Services | **Expected Date of Completion:**11/30/2018 |
| **Evidence of Completion of the Corrective Action:**1)Revised handbook 2)School Council agenda and notes3)School Committee Vote |
| **Description of Internal Monitoring Procedures:** The building principal will ensure that each step of the corrective action plan is implemented. She will monitor the process to ensure appropriate changes are reflected in the handbook. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Partially Approved **Status Date:** 04/27/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:** The Department cannot approve the corrective action with the proposed timelines. The school committee should approve the updates to the handbook before it is issued for the 2018-2019 school year. Additionally, the Department should review the proposed changes before they go to the school committee. |
| **Department Order of Corrective Action:**Draft updated language that will be included in the 2018-2019 student handbook that outlines due process in disciplinary proceedings; discipline of students with special needs; discipline of students with Section 504 Accommodation Plans; a non-discrimination statement that addresses all protected categories; and procedures for accepting, investigating and resolving complaints alleging discrimination or harassment. |
| **Required Elements of Progress Report(s):** By June 15, 2018, provide a copy of the proposed language that will be included in the 2018-2019 Petersham Elementary School Student handbook outlining the due process in disciplinary proceedings; discipline of students with special needs; discipline of students with Section 504 Accommodation Plans; a non-discrimination statement that addresses all protected categories; and procedures for accepting, investigating and resolving complaints alleging discrimination or harassment. By September 14, 2018, provide a link to the updated 2018-2019 Petersham Elementary School Student handbook on the school website, which contains procedures to ensure due process in disciplinary proceedings; discipline of students with special needs; discipline of students with Section 504 Accommodation Plans; a non-discrimination statement that addresses all protected categories; and procedures for accepting, investigating and resolving complaints alleging discrimination or harassment. |
| **Progress Report Due Date(s):** 06/15/201809/14/2018 |

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| **Criterion & Topic:** CR 10B Bullying Intervention and Prevention | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicates that the district has not updated the Bullying Prevention and Intervention Plan (Plan) to extend protections to students who are bullied by a member of the school staff and the Plan does not make clear that a member of the school staff may be named the "aggressor" or "perpetrator" in a bullying report. Additionally, the school handbook does not contain relevant sections of the amended Plan. |
| **Description of Corrective Action:** 1) By June 30, 2018 the Principal will update identified pages and paragraphs of the handbook that require additions or alterations to meet identified requirements. 2) By October, 2018 the School Council will receive copies of proposed handbook changes for review. The School Council will make recommendations and and vote on identified changes. 3) By November 2018 the School Committee will review and vote to accept all proposed updates in the handbook. 4) By December 15, 2018 all organizational updates will be completed in the handbook and be available on the district's resource page for parents, students, faculty, and community members. |
| **Title/Role(s) of Responsible Persons:**Joanne Menard, Building Principal | **Expected Date of Completion:**12/30/2018 |
| **Evidence of Completion of the Corrective Action:**1) Updated section of the handbook 2) School Council meeting sign-in and notes 3) School Committee Meeting sign-in, agenda, and notes 4) Updated Handbook. |
| **Description of Internal Monitoring Procedures:** The Director of Special Services in collaboration with the building principal will monitor the completion of each proposed step. This will occur during both special education tactical meetings and as a component of monthly elementary tactical meetings. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10B Bullying Intervention and Prevention | **Corrective Action Plan Status:** Partially Approved **Status Date:** 04/27/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:** The Department cannot approve the corrective action with the proposed timelines. The school committee should approve the updates to the Bullying Prevention and Intervention Plan and the student handbook before it is issued for the 2018-2019 school year. Additionally, the Department should review the proposed changes before they go to the school committee. |
| **Department Order of Corrective Action:**Draft an updated Bullying Prevention and Intervention Plan that will be included in the 2018-2019 student handbook that extends protections to students who are bullied by a member of the school staff and makes clear that a member of the school staff may be named the "aggressor" or "perpetrator" in a bullying report. |
| **Required Elements of Progress Report(s):** By June 15, 2018, provide a copy of the proposed Bullying Prevention and Intervention Plan (Plan) that will also be included in the 2018-2019, Petersham Elementary School Student handbook, that extends protections to students who are bullied by a member of the school staff and makes clear that a member of the school staff may be named the "aggressor" or "perpetrator" in a bullying report.By September 14, 2018, provide a link to the updated Plan on the school website and a link to the 2018-2019 Petersham Elementary School Student handbook that contains information from the updated Plan. |
| **Progress Report Due Date(s):** 06/15/201809/14/2018 |

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| **Criterion & Topic:** CR 10C Student Discipline | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Document review indicates that the district has not developed the following:School-wide Education Service Plan describing the educational services that the district will make available to students who are suspended or expelled for more that 10 days to provide them with an opportunity to make academic progress; Notice of suspension and hearing that provides the student with an opportunity for a hearing on the charge and the parent/guardian with an opportunity to participate in the hearing, prior to imposing a suspension as a consequence for a disciplinary offense; andSystem for the periodic review of discipline data by selected populations. |
| **Description of Corrective Action:** 1) By August 15, 2018 the Principal will meet with the High School principal to discuss and make appropriate changes to the Notice of Suspension and Hearing. 2) By September 15, 2018 an updated letter template will be developed and shared with the Administrative Team at the October 2018 Elementary Administrative Tactical meeting. New procedures regarding the distribution of the Notice of Suspension and Hearing will be shared with the team regarding the necessity of providing copies to both parents and students. 3) By August 15, 2018, the Principal and Data Management personnel will meet and develop a reporting format that allows monthly review of discipline data by special populations. This process will be coordinated with the monthly culture and climate reports. 4) The Elementary administrative team will review this data at the monthly tactical meetings. |
| **Title/Role(s) of Responsible Persons:**Joanne Menard, PrincipalMeghan MacDonnell, Student Information Manager | **Expected Date of Completion:**12/30/2018 |
| **Evidence of Completion of the Corrective Action:**1) Updated Notice of Suspension and Hearing 2) Meeting Notes from Elementary Tactical meetings 3) Updated culture and climate report format. |
| **Description of Internal Monitoring Procedures:** Handbooks are reviewed annually by the Administration, School Council, and School Committee to ensure compliance with school policies and state regulations. In addition, the Director of Special Services in collaboration with the Supervisor of Special Services, the Curriculum Coordinator, and Building Principal will monitor the completion of each proposed step. This will occur during both special education tactical meetings and as a component of monthly Elementary tactical meetings. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10C Student Discipline | **Corrective Action Plan Status:** Approved **Status Date:** 04/27/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 15, 2018 submit:1) a School-wide Education Service Plan describing the educational services that the district will make available to students who are suspended or expelled for more that 10 days to provide them with an opportunity to make academic progress; 2) a Notice of suspension and hearing that provides the student with an opportunity for a hearing on the charge and the parent/guardian with an opportunity to participate in the hearing, prior to imposing a suspension as a consequence for a disciplinary offense; and 3) a System for the periodic review of discipline data by selected populations. |
| **Progress Report Due Date(s):** 06/15/2018 |

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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 indicates that the district has not published the name(s), office address(es) and phone number(s) of the person(s) designated to coordinate compliance under Title IX and Section 504. |
| **Description of Corrective Action:** 1)The Director of Special Education will meet with building principals to discuss the requirements that the name(s), office address(es) and phone number(s) of the person(s) designated to coordinate compliance under Title IX and Section 504 must be published in the handbook and on the district website. To be completed by June 30, 2018. 2) The Building Principal will identify where this information should be included in the handbook and make the necessary adjustments no later that August 15, 2018. 3) The building principal will work with the Tech Department to ensure that this information is included on the district website no later than August 15, 2018. 4) The handbook changes will be reviewed by the School Advisory Council no later than October 2018. 5) The school committee will vote on the handbook changes by November 2018. |
| **Title/Role(s) of Responsible Persons:**Joanne Menard, Building PrincipalRebecca Phillips, Director of Special Services | **Expected Date of Completion:**12/30/2018 |
| **Evidence of Completion of the Corrective Action:**1) Revised Handbook2) School Council agenda and meeting notes3) School Committee Vote |
| **Description of Internal Monitoring Procedures:** The Director of Special Services will work with the Building Principal to ensure that each set of the corrective action plan is completed. This will be reviewed at the Elementary Tactical Meetings. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 12A Annual and continuous notification concerning nondiscrimination and coordinators | **Corrective Action Plan Status:** Approved **Status Date:** 04/27/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 14, 2018, submit evidence that the district has published the name(s), office address(es) and phone number(s) of the person(s) designated to coordinate compliance under Title IX and Section 504. |
| **Progress Report Due Date(s):** 09/14/2018 |

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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 interviews indicate that the district has updated the restraint prevention and behavior support policy to include all content consistent with regulatory requirements that went into effect January 1, 2016, but has not developed procedures to implement the policy, to include:methods for preventing student violence, self-injurious behavior and suicide;methods for engaging parents in discussions about restraint prevention and use;alternatives to physical restraint and methods of physical restraint in emergency situations;a statement prohibiting: medication restraint, mechanical restraint, prone restraint unless permitted pursuant to 603 CMR 46.03(1)(b), seclusion, and the use of restraint inconsistent with 603 CMR 46.03;a description of the training requirements, reporting requirements, and follow-up procedures;a procedure for receiving and investigating complaints;a procedure for conducting periodic review of data and documentation on the program's use of restraint;a procedure for making both oral and written notification to the parent; anda procedure for the use of time-out. |
| **Description of Corrective Action:** 1) By June 15, 2018, the Director of Special Services will consult with the Director of Guidance to review existing procedures and guidance relative to prevention of student violence, self-injurious behavior and suicide. 2) By June 30, 2018, the Director of Special Services and the Supervisor of Special Services will meet to review current restraint policies and district wide training on crisis prevention and de-escalation. 3) By August 1, 2018, the Building Principal, Director of Special Services, and Supervisor of Special Services will meet to review, refine, and develop procedures to address identified areas related to physical restraint and the prevention of crisis. 4) By August 15, 2018, finalized procedures will be presented to the Superintendent and administrative team and be included in the district on-line training module. 5) By September 30, 2018, all staff will complete module |
| **Title/Role(s) of Responsible Persons:**Joanne Menard, Building PrincipalRebecca Phillips, Director of Special Services | **Expected Date of Completion:**12/30/2018 |
| **Evidence of Completion of the Corrective Action:**Evidence of Completion: 1) Completion of procedures 2) Copy of assurance that staff have completed module. 3) Notes from meetings/discussions. |
| **Description of Internal Monitoring Procedures:** The Director of Special Services in collaboration with the Supervisor of Special Services, and the Building Principal will monitor the completion of proposed steps. This will occur during both special education tactical meetings and as a component of monthly Elementary tactical meetings. |
| 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:** 04/27/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 14, 2018, submit procedures to implement the physical restraint policy that addresses:1) methods for preventing student violence, self-injurious behavior and suicide; 2) methods for engaging parents in discussions about restraint prevention and use; 3) alternatives to physical restraint and methods of physical restraint in emergency situations; 4) a statement prohibiting: medication restraint, mechanical restraint, prone restraint unless permitted pursuant to 603 CMR 46.03(1)(b), seclusion, and the use of restraint inconsistent with 603 CMR 46.03; 5) a description of the training requirements, reporting requirements, and follow-up procedures; 6) a procedure for receiving and investigating complaints; 7) a procedure for conducting periodic review of data and documentation on the program's use of restraint; 8) a procedure for making both oral and written notification to the parent; and 9) a procedure for the use of time-out.By September 14, 2018, submit evidence ( a copy of the on-line training module) that staff has been informed of the physical restraint procedures. |
| **Progress Report Due Date(s):** 09/14/2018 |

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| **Criterion & Topic:** CR 25 Institutional self-evaluation | **CPR Rating:** Not Implemented |
| **Department CPR Findings:** Document review and interviews indicate that the district does not evaluate all aspects of its K-6 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. |
| **Description of Corrective Action:** 1)The district has developed a survey in response to the Institutional Self-Evaluation requirement. This survey will be distributed to all staff members no later than May 30, 2018 with a due date of June 15, 2018. 2) By August 15, 2018 the Curriculum Coordinator, Building Principal, Director of Special services and the Supervisor of Services will meet to review survey results and make recommendation. |
| **Title/Role(s) of Responsible Persons:**Joanne Menard, Building PrincipalRebecca Phillips, Director of Special Services | **Expected Date of Completion:**12/30/2018 |
| **Evidence of Completion of the Corrective Action:**1) Survey2) Survey results3) Discussion notes and recommendations |
| **Description of Internal Monitoring Procedures:** On an annual basis, at the end of year meetings, faculty and administration will use the designated template to perform a programmatic review and suggest changes based on the results. These findings and changes will be shared with all stakeholders. In addition, The Director of Special Services in collaboration with the Supervisor of Special Services, the Curriculum Coordinator, Director of Guidance, and Building Principals will monitor the completion of each proposed step. This will occur during both special education tactical meetings and as a component of monthly Elementary tactical meetings |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 25 Institutional self-evaluation | **Corrective Action Plan Status:** Approved **Status Date:** 04/27/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By September 14, 2018, submit the results of the institutional self-evaluation of the district's K-6 program to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities that includes results and recommendations. |
| **Progress Report Due Date(s):** 09/14/2018 |