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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: Bentley Academy Charter School (District)

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 03/16/2018.

**Mandatory One-Year Compliance Date:** **03/16/2019**

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

| **Criterion** | **Criterion Title** | **CPR Rating** |
| --- | --- | --- |
| SE 32 | Parent advisory council for special education | Not Implemented |
| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 10B | Bullying Intervention and Prevention | Partially Implemented |
| CR 11A | Designation of coordinator(s); grievance procedures | Partially Implemented |
| CR 25 | Institutional self-evaluation | Partially Implemented |
| ELE 1 | Annual English Language Proficiency Assessment | Not Implemented |
| ELE 6 | Program Exit and Readiness | Partially Implemented |
| ELE 14 | Licensure Requirements | Partially Implemented |
| ELE 17 | Program Evaluation | Not Implemented |

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| **Criterion & Topic:** SE 32 Parent advisory council for special education | **CPR Rating:** Not Implemented |
| **Department CPR Findings:** A review of documents and staff interviews indicated that the charter school has not established a parent advisory council (PAC) on special education or sought a waiver from the Department to meet this requirement in an alternative manner. |
| **Description of Corrective Action:** The district intends to seek a waiver from the Department to meet this requirement through working with a Regional SEPAC. |
| **Title/Role(s) of Responsible Persons:**Special Education Administrator | **Expected Date of Completion:**06/30/2018 |
| **Evidence of Completion of the Corrective Action:**Waiver submission to Problem Resolution System in the Center for Educational Options. |
| **Description of Internal Monitoring Procedures:** - Create parent survey to assess needs and create follow up surveys at intervals throughout the year- Coordinate with SEPAC board to monitor needs of parent community- Schedule meetings with SEPAC at predetermined intervals to gather feedback germane to the planning, development and evaluation of the district's special education programs |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** SE 32 Parent advisory council for special education | **Corrective Action Plan Status:** Approved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 28, 2018, submit a copy of the DESE-approved waiver request. By October 12, 2018, submit evidence that SEPAC meetings are open to parents of students with disabilities from Bentley Academy. Documentation may include copies of announcements and other outreach to Bentley Academy parents informing them of upcoming joint SEPAC meetings. |
| **Progress Report Due Date(s):** 06/28/201810/12/2018 |

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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 the charter school's code of conduct does not contain procedures for accepting, investigating and resolving complaints alleging discrimination or harassment or the disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred. |
| **Description of Corrective Action:** The school code of conduct will be updated to reflect procedures for accepting, investigating and resolving complaints alleging discrimination or harassment or the disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred. This code of conduct will be posted on the website and be shared with families. |
| **Title/Role(s) of Responsible Persons:**Marlena Afonso, Head of School | **Expected Date of Completion:**06/01/2018 |
| **Evidence of Completion of the Corrective Action:**Updated code of conduct |
| **Description of Internal Monitoring Procedures:** Code of Conduct will be reviewed each year in June to ensure compliance. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Approved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 28, 2018, submit web links to the charter school's updated code of conduct that includes procedures for accepting, investigating and resolving complaints alleging discrimination or harassment or the disciplinary measures that the school may impose if it determines that harassment or discrimination has occurred. |
| **Progress Report Due Date(s):** 06/28/2018 |

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| **Criterion & Topic:** CR 10B Bullying Intervention and Prevention | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that the charter school has not developed its own Bullying Intervention and Prevention Plan (Plan); rather, the school refers to the Plan developed by Salem Public Schools. Document review also indicated that staff training does not address bullying of students by a member of the school staff. In addition, the Plan is not posted on the charter school's website. |
| **Description of Corrective Action:** The bully intervention and prevention plan will be updated and formally adopted by Bentley Academy. The plan will then be shared with teachers/staff during summer professional development. Specifically the new training will address the bullying of students by a member of the school. Once the new plan is adopted it will be posted. |
| **Title/Role(s) of Responsible Persons:**Marlena Afonso, Head of School Jenna Cripps, Dean of Operations and School Culture | **Expected Date of Completion:**08/20/2018 |
| **Evidence of Completion of the Corrective Action:**The updated plan will be posted to the website. The new training PowerPoint will be shared and sign in from the staff training will be shared. |
| **Description of Internal Monitoring Procedures:** The Bullying Intervention and Prevention Plan will be reviewed annually and training will be conducted for staff each summer before the school year begins. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10B Bullying Intervention and Prevention | **Corrective Action Plan Status:** Approved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 28, submit a copy of the formally adopted Bullying Intervention and Prevention Plan for Bentley Academy.By October 12, 2018, submit web links to the updated Bullying Prevention and Intervention Plan with protections for students who are bullied by a member of the school staff on the charter school's web site.By October 12, 2018, submit evidence of training for all staff on the revised Plan. Include the agenda, signed attendance sheet, name and role of presenter, and training materials. |
| **Progress Report Due Date(s):** 10/12/2018 |

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| **Criterion & Topic:** CR 11A Designation of coordinator(s); grievance procedures | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that the charter school has not disseminated grievance procedures for students providing for prompt and equitable resolution of complaints alleging discrimination based on sex or disability. |
| **Description of Corrective Action:** Policy will be created to create a clear grievance procedures for students providing for prompt and equitable resolution of complaints alleging discrimination based on sex or disability. This then will be shared with staff/students through the Scholar Handbook. |
| **Title/Role(s) of Responsible Persons:**Marlena Afonso, Head of School Jenna Cripps, Dean of Operations and School Culture | **Expected Date of Completion:**08/20/2018 |
| **Evidence of Completion of the Corrective Action:**Scholar Handbook |
| **Description of Internal Monitoring Procedures:** Policies will be reviewed each year in July and then will be shared with staff/students in August. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 11A Designation of coordinator(s); grievance procedures | **Corrective Action Plan Status:** Approved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** By June 28, submit a copy of the charter school's grievance procedures for students providing for prompt and equitable resolution of complaints alleging discrimination based on sex or disability.By June 28, 2018, submit evidence of dissemination of the charter school's grievance procedures for employees that provide for prompt and equitable resolution of complaints alleging discrimination based on sex or disability to all district staff. This can take the form of a link to the appropriate page of the Scholar Handbook. |
| **Progress Report Due Date(s):** 06/28/2018 |

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| **Criterion & Topic:** CR 25 Institutional self-evaluation | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Although the charter school reviews achievement data for students with disabilities and English learners, a review of documents indicated that the school does not evaluate all aspects of its K-5 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:** The teacher leader team (BALT) will review the resources shared from the department of how to conduct a review that ensures all aspects of our K-5 program are reviewed annually. Then in July they will use their procedure to review the 2017-2018 school year. Moving forward each July this review will be completed. |
| **Title/Role(s) of Responsible Persons:**Marlena Afonso, Head of School Jenna Cripps, Dean of Operations and School Culture | **Expected Date of Completion:**08/20/2018 |
| **Evidence of Completion of the Corrective Action:**The plan created by BALT The 2017-2018 review |
| **Description of Internal Monitoring Procedures:** This will happen annually. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 25 Institutional self-evaluation | **Corrective Action Plan Status:** Approved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** For Department guidance on developing an institutional self-evaluation, please see the Tiered Focused Monitoring Technical Assistance Toolkit for CR 24 & CR 25 located in the WBMS Document Library.By June 28, 2018, submit the district's plan for the self-evaluation, including timeline of activities and key staff responsible to ensure the district provides equal access to all programming across all grades PreK-12 and identifies any areas where HVM policies, procedures, or practices are preventing full access. By October 12, 2018 submit the evaluation tools and preliminary results of the self-evaluation with evidence documenting the implementation of the plan to evaluate policies and programming access. By October 12, 2018 submit a written narrative summary on the outcomes of the institutional self-evaluation and changes the district is implementing to address any barriers to equal access. |
| **Progress Report Due Date(s):** 06/28/201810/12/2018 |

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| **Criterion & Topic:** ELE 1 Annual English Language Proficiency Assessment | **CPR Rating:** Not Implemented |
| **Department CPR Findings:** A review of ACCESS participation rates as shown in the state database indicated that the charter school assessed the English proficiency of 90 % of its English learner (EL) students. |
| **Description of Corrective Action:** Bentley Academy will identify all past and present ELL and categorized them by their current status to ensure that all active students, including "Opt Out" students, will be given the ACCESS 2.0 assessment moving forward. The Bentley Academy test coordinator will attend the Salem Public schools ACCESS 2.0 training program which outlines the guidelines for testing and includes an explanation as to the students who should be tested. |
| **Title/Role(s) of Responsible Persons:**Marlena Afonso/Head of School, Laura Towey/ESL Teacher Leader | **Expected Date of Completion:**01/01/2018 |
| **Evidence of Completion of the Corrective Action:**The Bentley Academy ESL team will identify all past and present ELLs and categorized them by their current status to ensure that all eligible students are given the ACCESS 2.0 test moving forward. All ESL teachers will be given training and complete required certification prior to students taking the ACCESS 2.0 test. |
| **Description of Internal Monitoring Procedures:** The Bentley Academy ESL team will identify and monitor all current and former ELLs including "Opt Out" students to gage their continued success and participation in the ELD program. The students will be monitored using the data collected from general education teachers on the FLEP and Opt Out forms. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** ELE 1 Annual English Language Proficiency Assessment | **Corrective Action Plan Status:** Approved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** 1- Identify the procedures ELE staff and staff responsible of the data entry to SIMS will follow to ensure all data submitted to SIMS reflect students' current ELE program status. 2- Provide training to all staff members involved in ACCESS test administration, data entry and ELE staff to ensure that they are all knowledgeable about the procedures and submit the training materials, sign-in sheets and agendas by the progress report due date. |
| **Progress Report Due Date(s):** 06/28/2018 |

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| **Criterion & Topic:** ELE 6 Program Exit and Readiness | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** A review of documents indicated that the charter school's reclassification procedures have not been revised and still refer to the English proficiency tests MEPA and MELA-O that have been replaced by ACCESS for ELLs in 2013. Staff interviews and a review of documentation also indicated that the charter school has a different set of exit criteria for ELs with disabilities; and an EL with disabilities has been reclassified as a Former English Learner (FEL) at the WIDA proficiency level as low as 2.3. The charter school's current reclassification procedures and practice are not in compliance with 603 CMR 14.02 that requires districts and charter schools to establish exit criteria in accordance with the Department guidelines. |
| **Description of Corrective Action:** The procedure to reclassify students as Former English Learner (FEL) corresponds with the procedure used by Salem School Department. In accordance with 603 CMR 14.02: Bentley has established procedures to identify those students who may be English Learners through the WAPT assessment upon their enrollment at Bentley. |
| **Title/Role(s) of Responsible Persons:**Marlena Afonso/Head of School, Laura Towey/ESL Teacher Leader | **Expected Date of Completion:**05/01/2018 |
| **Evidence of Completion of the Corrective Action:**Bentley will identify students who may be English Learners through the WAPT assessment upon their enrollment at Bentley. Bentley ESL Department will then provide the parents or guardians of the students identified as ELLs with notification as to the students English proficiency and their placement in the ELD program. Bentley will follow the exiting criteria guidelines established by the Massachusetts Department of Elementary and Secondary Education to identify students who may no longer be English learners. The reclassification process will be done in cooperation with the Salem School District ESL department staff. A team that includes Bentley ESL and general education teachers along with a representative from Salem Schools ESL department and Bentley's principal Marlena Afonso will meet to review the students ACCESS 2.0 and MCAS scores along with formative and summative data. If an ELL has an IEP the special education team will be involved to determine whether the student’s progress or lack of progress is a result of their English language proficiency level or their identified disability. The team will discuss all the data and then makes a determination as to whether a student should be classified as a FEL. If the students MCAS scores are unavailable and their ACCESS scores are below level 4 then the determination to reclassify is postponed until the MCAS scores are available. This last step will be taken to ensure that the student has met the established criteria to be reclassified as a FEL. The evidence of completion will be the accompanying documentation both in the students cum folder and on ELLevations. |
| **Description of Internal Monitoring Procedures:** Bentley Academy will create and maintain folders which will contain all documentation and data collected relating to the students English language development. The folder will be placed in each ELLs cum folder so that it is accessible to the general education teachers or special education teacher who provide educational support. The documentation will include but not be limited to progress reports, Access and MCAS scores as well as FLEP or OPT Out forms so that the monitoring team has a complete representation of the students language development. Student's will be continually monitored through meetings between the ESL teacher and the content teachers to discuss academic progress. Students will be monitored through observations of participation, performance and through conversations with parents as to their student's continued academic growth. The monitoring will remain in place for 4 years. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** ELE 6 Program Exit and Readiness | **Corrective Action Plan Status:** Disapproved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:** Reclassification procedures submitted by the charter school for this progress report is not in compliance with 603 CMR 14.02 that requires districts and charter schools to establish exit criteria in accordance with the Department guidelines. Please contact Sibel Hughes at (781) 338-3569 should you need technical assistance. |
| **Department Order of Corrective Action:**Please see below. |
| **Required Elements of Progress Report(s):** 1-Submit the district's revised reclassification policies and procedures. 2- Provide training to all staff members involved in the reclassification process to ensure that they are all knowledgeable about the changes and submit the training materials, sign-in sheets and agendas. 3-Please use FEL Roster available in the Document Library to provide information for all the ELs in your district who have been reclassified in the last school year. |
| **Progress Report Due Date(s):** 06/28/2018 |

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| **Criterion & Topic:** ELE 14 Licensure Requirements | **CPR Rating:** Partially Implemented |
| **Department CPR Findings:** Staff interviews and the relevant SEI endorsement data indicated that not all core academic teachers assigned to provide sheltered English instruction to English learners hold the SEI Teacher Endorsement. |
| **Description of Corrective Action:** As of September 1, 2017 all of Bentley Academy's core academic teachers are SEI endorsed. |
| **Title/Role(s) of Responsible Persons:**Marlena Afonso/Head of School, Laura Towey/ESL Teacher Leader | **Expected Date of Completion:**04/07/2018 |
| **Evidence of Completion of the Corrective Action:**As of September 1, 2017 all of Bentley Academy's core academic teachers are SEI endorsed. |
| **Description of Internal Monitoring Procedures:** As of September 1, 2017 all of Bentley Academy's core academic teachers are SEI endorsed. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** ELE 14 Licensure Requirements | **Corrective Action Plan Status:** Approved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:**  |
| **Department Order of Corrective Action:** |
| **Required Elements of Progress Report(s):** The Department will follow up with the charter school's progress in the SY 2018-19. Please submit the completed SEI endorsement form available in the Document Library to provide information regarding the SEI endorsement status of the core academic teachers assigned to ELs in the SY 2018-19. |
| **Progress Report Due Date(s):** 10/12/2018 |

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| **Criterion & Topic:** ELE 17 Program Evaluation | **CPR Rating:** Not Implemented |
| **Department CPR Findings:** A review of documents indicated that the charter school does not have a comprehensive process to evaluate the effectiveness of its ELE programming in developing students' English language skills and increasing their ability to participate meaningfully in the school's educational program. |
| **Description of Corrective Action:** Bentley Academy ESL program will continue to use National Geographic Reach books as a tool and a resource for instruction. The ESL curriculum will continue to expand lesson planning to include the WIDA standards-based system for each language domain and language proficiency. Lessons will be based on the academic language needed for the four specific communicative purposes. The ELD curriculum will be constructed using the October 2017 report developed by the Department of Elementary and Secondary Education. The report will provide guidance on identifying, assessing, placing and reclassifying English Learners. The lesson/Unit plans will consist of opportunities for ELs to participate in small and large group activities. Students speaking and writing will be assessed using rubrics that identify linguistic complexity, vocabulary usage and language control. The students reading progress is assessed using the STEP assessment program that is used school wide to both assess and support reading development. The ELs will be asked to provide both verbal and written responses that correspond with their proficiency levels. The language objectives will contain an academic language focus for each lesson which facilitates greater transfer of content. |
| **Title/Role(s) of Responsible Persons:**Marlena Afonso/Head of School, Laura Towey/ESL Teacher Leader | **Expected Date of Completion:**03/01/2019 |
| **Evidence of Completion of the Corrective Action:**In accordance with the guideline provided in the DESE 10/17 report Bentley Academy will use the Castaneda test to implement and evaluate the EL program. All Bentley core content teachers are SEI endorsed in order to ensure that the core content instruction is accessible to all ELs. All core classroom teacher are trained in SEI best practices which will address the first prong, educational theory. Students will receive both push in and pull out services depending on their proficiency level. Lesson/unit plans will contain instructional academic language focus and curriculum will be developed or modified to ensure that it addresses the ELs needs at all proficiency levels. Students speaking and writing will be assessed using rubrics that identify linguistic complexity, vocabulary usage and language control. The students reading progress is assessed using the STEP assessment program that is used school wide to both assess and support reading development as well as language proficiency. Periodic evaluations will include creation of flexible groups and scheduling that are based on the students changing needs or proficiency levels. Evidence of Completion will include documentation that supports all three prongs of the Castaneda test along with documentation that outlines the ELD curriculum modifications. |
| **Description of Internal Monitoring Procedures:** Internal monitoring will consist of classifying students English language changing proficiency levels and placement in an SEI education program. Students academic performance will be continuously reviewed to monitor their progress and to adjust their services based on the data collected. Student growth will be monitored using formative, interim and summative assessments in cooperation with continuous training provided during CPT or Salem District ESL professional development opportunities to allow for effective analysis of the data produced. The summative assessment will be ACCESS for ELLs 2.0, the interim assessments that will be used will be the WIDA MODEL to track English language proficiency progress along with formative assessments. Formative assessments will consist of unit vocabulary, written, spoken and reading data that is continuously collected to inform instructional planning and differentiation. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** ELE 17 Program Evaluation | **Corrective Action Plan Status:** Disapproved **Status Date:** 04/25/2018 **Correction Status:** Not Corrected |
| **Basis for Decision:** The narrative submitted by the charter school does not qualify as a corrective action to address the concern described in the Department's finding for ELE 17. Please contact Sibel Hughes at (781) 338-3569 should you need assistance. |
| **Department Order of Corrective Action:**Please see below. |
| **Required Elements of Progress Report(s):** 1. Please complete the program evaluation tool that is available at http://www.doe.mass.edu/ell/ProgramEvaluation.pdf. The charter school must complete all of the components of the attached form in order to evaluate the effectiveness of its ELE program in developing students' English language skills and increasing their ability to participate meaningfully in the district's educational program. 2. Please provide information regarding the strengths and areas of improvement the district identified as a result of its ELE program evaluation. 3. Please provide a plan of action to make appropriate program adjustments or changes that are responsive to the outcomes of the program evaluation to improve the effectiveness of the program at promoting and supporting the rapid acquisition of English language proficiency by ELs as is required in G.L. c. 71A.4. Considering only 38 % of ELs made progress in English language acquisition, explain the program goals to improve the outcomes of the charter school's ELE program. |
| **Progress Report Due Date(s):** 06/28/2018 |