# MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION

**Public School Monitoring** 

#### TIERED FOCUSED MONITORING REVIEW

#### **CORRECTIVE ACTION PLAN**

**Charter School or District: Boston** 

TFM Onsite Year: 2020-2021

**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 08/25/2021.

Mandatory One-Year Compliance Date: 08/25/2022

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

Criterion	Criterion Title	TFM Rating
SE 2	Required and optional assessments	Partially
		Implemented
SE 6	Determination of transition services	Partially
		Implemented
SE 7	Transfer of parental rights at age of majority and student	Partially
	participation and consent at the age of majority	Implemented
SE 8	IEP Team composition and attendance	Partially
		Implemented
SE 9	Timeline for determination of eligibility	Partially
		Implemented
SE 12	Frequency of re-evaluation	Partially
		Implemented
SE 13	Progress Reports and content	Partially
		Implemented

Criterion	Criterion Title	TFM Rating
SE 18A	IEP development and content	Partially
		Implemented
SE 20	Least restrictive program selected	Partially
		Implemented
SE 22	IEP implementation and availability	Partially
		Implemented
SE 25	Parental consent	Partially
		Implemented
SE 29	Communications are in English and primary language of	Partially
	home	Implemented
SE 34	Continuum of alternative services and placements	Partially
		Implemented
SE 35	Assistive technology: specialized materials and equipment	Partially
		Implemented
SE 39	Procedures used to provide services to eligible students	Partially
	enrolled in private schools at private expense	Implemented
SE 40	Instructional grouping requirements for students aged five	Partially
	and older	Implemented
SE 41	Age span requirements	Partially
		Implemented
SE 42	Programs for young children three and four years of age	Partially
		Implemented
SE 43	Behavioral interventions	Partially
		Implemented
CR 18	Responsibilities of the school principal	Partially
	<u> </u>	Implemented

Criterion & Topic: TFM Rating:

SE 2 Required and optional assessments Partially Implemented

#### **Department TFM Findings:**

A review of student records indicated that the district does not consistently complete all required assessments, specifically an educational assessment that includes a history of the student's educational progress in the general curriculum.

### **Description of Corrective Action:**

Continue working with Public Consulting Group (PCG) to streamline the EdPlan management system to address these issues

Reformat how EDA/B forms are completed in the referral process of EdPlan

No longer require these forms for annuals as confirmed with DESE

Provide targeted description of who completes EDA/ EDB

Provide professional development (PD) to Coordinators of Special Education (COSE)

The Assistant Superintendent, Office of Special Education (OSE) will inform school leaders and staff via a memo on why and how the forms will be completed

Title/Role(s) of Responsible Persons:

Manger of Compliance

**Expected Date of Completion:** 

05/15/2022

#### **Evidence of Completion of the Corrective Action:**

Updated EdPlan platform with an anticipated date of completion from PCG

EDA/B forms are completed consistently for every student

Power-point presentation, memos, attendance sheet

Updated process on OSE BPS website

# **Description of Internal Monitoring Procedures:**

Monitor the completion of EDA/B forms through a data pull of current/pending evals quarterly using a district developed template

#### **CORRECTIVE ACTION PLAN APPROVAL SECTION**

Criterion:Corrective Action Plan Status: ApprovedSE 2 Required and optionalStatus Date: 11/09/2021assessmentsCorrection Status: Not Corrected

Basis for Decision:

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By January 21, 2022, BPS will submit a description of the updates made to its internal tracking system to ensure the completion of required assessments.

By January 21, 2022, BPS will submit evidence of educational assessment training provided to the Coordinators of Special Education (COSEs). BPS will also send school leaders and relevant staff a memo explaining the purpose of the educational assessments and how they are completed. Evidence will include an agenda, training materials, sign-in sheets, and a copy of the memo.

By January 21, 2022, BPS will ensure that issues of noncompliance for the students identified by the Department are corrected. Specifically, BPS will conduct an educational assessment that includes a history of the student's educational progress in the general curriculum and reconvene IEP Teams, as appropriate. Evidence will include the completed educational assessments, attendance sheets, and Notices of Proposed School District Action (N1).

By May 6, 2022, BPS will submit the results of an internal review of 30 special education student records across all grade levels to ensure that all required assessments are completed. The summary of results will include the number of records found compliant and noncompliant. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

# **Progress Report Due Date(s):**

01/21/2022 03/11/2022 05/06/2022

Criterion & Topic:	TFM Rating:
SE 6 Determination of transition services	Partially Implemented

#### **Department TFM Findings:**

A review of student records and staff interviews indicated that beginning no later than when the student is 14 years old, the Team discusses the student's transition needs annually. However, students are not consistently invited to and encouraged to attend part or all of Team meetings at which transition services are discussed or proposed and IEPs do not consistently include transition services, as appropriate.

#### **Description of Corrective Action:**

Provide PD to the COSE and Assistant Directors (AD) on the following:

Review Transition regulation for student participation at the meeting: EdPlan training:

EdPlan automatically adds age 14 and above

COSE needs to ensure that all students turning 14 during IEP cycle are added as part of the team

Outline strategies to increase student participation at Team meetings: Teacher prepares student to meaningfully participate at the IEP meeting Student leads IEP meeting and participates during vision statement The meeting is conducted in a student-centered manner

Provide guidance on how to handle meetings where a student refuses to attend, or a parent/guardian refuses to allow the student to participate

How to work with the parent to allow student to attend part of the meeting Document when student is not allowed to participate

Document in N1 (?) and provide additional information in the IEP

Present at SEPAC (?) on students participating at Team meetings at age 14

Transition services are embedded in IEP:

Provide small group PD to high school and middle school COSE on how transition needs to be embedded in the IEP and how write a transition IEP

Work with PCG to:

Create a required field where the COSE will have to check off who attended the Team meeting as per the signed/uploaded attendance sheet

Theeting as per the signed appleaded attendance sheet	
Title/Role(s) of Responsible Persons:	Expected Date of
Assistant Director of Transition	Completion:
Manager of Compliance	05/15/2022

#### **Evidence of Completion of the Corrective Action:**

Participation at the meeting:

Agenda, power-point, attendance sheet, updated process on OSE BPS website and

memos to staff.

Random selection of team meeting attendance sheets with student signature as evidence of attendance

Documents:

SEPAC presentation

Member excusal samples

Transition services embedded in IEP:

Agenda, power-point, attendance sheet, updated process on OSE BPS website and memos to staff.

Sample IEPs

#### **Description of Internal Monitoring Procedures:**

Participation at the meeting:

File/spot check to ensure that COSE are following the process as outlined at the training.

Transition services embedded in IEP:

File/spot check to ensure that COSE are following the process as outlined at the training.

#### District file review template

CORRECTIVE ACTION PLAN APPROVAL SECTION		
Criterion:	Corrective Action Plan Status: Approved	
SE 6 Determination of transition	Status Date: 11/09/2021	
services	Correction Status: Not Corrected	

#### **Basis for Decision:**

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By January 21, 2022, BPS will provide evidence of transition service training for COSEs and Assistant Directors of Special Education. The training will not only address attendance requirements and the appropriate provision of transition services, but also strategies to prepare students for meaningful participation in their IEP meetings. Evidence will include an agenda, training materials, and sign-in sheets.

By January 21, 2022, BPS will ensure that issues of noncompliance for the students identified by the Department are corrected. Specifically, BPS will reconvene the IEP Teams for the students identified in the Indicator 13 data collection and the TFM onsite review.

- -For students identified under Indicator 13, BPS will provide evidence that required agencies were invited to the IEP Team meeting.
- -For students identified during the Tiered Focused Monitoring review, BPS will provide evidence that the students were invited to the IEP meeting and that IEPs include transition services, as appropriate.

-Evidence for all students identified by the Department will include attendance sheets, updated IEPs, and Notices of Proposed School District Action (N1).

By May 6, 2022, BPS will submit a second data set of 15 student records from Cohort 3 in the Indicator 13 section of the Web-based Monitoring System (WBMS). For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

# **Progress Report Due Date(s):**

01/21/2022 03/11/2022

05/06/2022

#### **Criterion & Topic:**

**TFM Rating:** 

SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority

Partially Implemented

#### **Department TFM Findings:**

A review of student records and staff interviews indicated that at least one year prior to the student reaching age 18, the district does not consistently inform the student and parents of the rights that will transfer from the parents to the student upon the student's 18th birthday. Record review and staff interviews also indicated that, upon reaching the age of majority, the district does not always obtain consent from the student with decision-making authority to continue the student's special education program.

### **Description of Corrective Action:**

At the beginning of each school year, remind schools to send the age of majority notification to all students turning 18 during that school year.

Provide training to clerks and COSE on the process for notification of age of majority and for tracking the forms.

#### Work with PCG/Ed Plan to do the following:

Create a stop gap to ensure that the form is completed at the IEP meeting Create the ability to automatically send the notification out to families at the start of the academic year

Ensure capability for data pull at each school to monitor notification and completion at IEP meetings

#### Provide PD to COSE on:

Efficient processes for how to notify and get age of majority forms signed

The importance of this form and why it needs to be completed

#### Title/Role(s) of Responsible Persons:

Asistant Directors of High schools

Manager of Compliance

**Expected Date of Completion:** 07/29/2022

#### **Evidence of Completion of the Corrective Action:**

Agenda, power-point, attendance sheet, updated process on OSE BPS website and memos to staff.

Sample forms

Updated on work with PCG

# **Description of Internal Monitoring Procedures:**

Every quarter, data will be pulled at each high school to monitor notification and completion at IEP meetings

#### **CORRECTIVE ACTION PLAN APPROVAL SECTION**

#### **Criterion:**

SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority

**Corrective Action Plan Status:** Approved

Status Date: 11/09/2021 Correction Status: Not Corrected

#### Basis for Decision:

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By January 21, 2022, BPS will ensure that issues of noncompliance for the students identified by the Department are corrected. Specifically, BPS will provide notification to the appropriate students and parents of the rights that will transfer from the parents to the student upon the student's 18th birthday. For the students with decision-making authority, BPS will obtain student consent to continue the special education program. Evidence will include age of majority notifications and signed IEPs, as applicable.

By March 11, 2022, BPS will provide training on the age of majority procedures for COSEs and administrative staff. Evidence will include an agenda, training materials, and sign-in sheets.

By May 6, 2022, BPS will submit the results of an internal review of five special education records of students turning 18 within one year and five special education records of students who have already turned 18 to ensure age of majority procedures are implemented. The summary of results will include the number of records found compliant and non-compliant. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

#### **Progress Report Due Date(s):**

01/21/2022 05/06/2022

Criterion & Topic:	TFM Rating:
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SE 8 IEP Team composition and attendance Partially Implemented

#### **Department TFM Findings:**

A review of student records indicated that the district does not always maintain documentation regarding IEP Team meeting attendees. A review of student records also indicated that the district does not document in writing agreement with the parent to excuse the attendance of a Team member. Furthermore, when the Team member's attendance is required, the district does not ensure that the Team member provides written input into the development of the IEP to the parent and the IEP Team prior to the meeting.

#### **Description of Corrective Action:**

OSE will provide targeted training to COSE on the following:

Requirement that the N3 and N3A forms for meetings are sent out at least 10 school days prior to the Team meeting and strategies to increase engagement from families

The process for determining who should be invited to the Team meeting and added to the attendance sheet

The process for ensuring that all invited participants sign in at the Team meeting, even when a parent/guardian does not show up

The process for IEP member excusal and how this should be documented.

The completed N3 and N3A will be uploaded in EdPlan

Best practices to ensure that all parties are in attendance at the meeting, and how to notify parent/guardian prior to the meeting if a staff member is unable to attend

#### Title/Role(s) of Responsible Persons:

Assistant Directors of School Settings

Manager of Compliance

Expected Date of Completion:

07/15/2022

#### **Evidence of Completion of the Corrective Action:**

Targeted PD addressing the area of non-compliance with Power-point, attendance sheet, updated process on OSE BPS website and memos to staff

#### **Description of Internal Monitoring Procedures:**

ADs will have shared calendars of COSE schedules. They will conduct spot checks with tier schools quarterly to ensure that this is being completed

District will create a template/check off for file review

#### **CORRECTIVE ACTION PLAN APPROVAL SECTION**

Criterion:
SE 8 IEP Team composition and attendance

Corrective Action Plan Status: Approved
Status Date: 11/09/2021
Correction Status: Not Corrected

#### **Basis for Decision:**

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By March 11, 2022, BPS will provide evidence of training for COSEs on IEP attendance procedures. Evidence will include an agenda, training materials, and sign-in sheets.

By May 6, 2022, BPS will submit the results of an internal review of 30 special education

student records across all grade levels to ensure attendance procedures are followed. The summary of results will include the number of records found compliant and noncompliant. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

# Progress Report Due Date(s):

03/11/2022 05/06/2022

Criterion & Topic:	TFM Rating:
SE 9 Timeline for determination of eligibility	Partially Implemented

#### **Department TFM Findings:**

A review of student records indicated that within forty-five school working days after receipt of the parent's written consent to an initial evaluation or re-evaluation, the district does not consistently determine whether the student is eligible for special education and does not provide to the parent either a proposed IEP and proposed placement or a written explanation of the finding of no eligibility.

#### **Description of Corrective Action:**

Review IEP timelines at a COSE PD

Re-present the timeline document

OSE data team created a data dashboard for monitoring compliance (central office only by school)

Each school will receive a monthly report of compliance noting progress for reevaluations and initial evaluations

Assistant Directors of Special Education will meet monthly with their schools to review the data

If the school is struggling with compliance timelines, they will need to submit a proposal to remedy the issue with the Assistant Superintendent of Special Education. If support is needed, it is to be noted in the plan.

Title/Role(s) of Responsible Persons:	Expected Date of
Manager of Compliance	Completion:
Assistant Director's of Special Education	06/09/2022

#### **Evidence of Completion of the Corrective Action:**

Meetings with schools in need of assistance with compliance

School plan for addressing ongoing compliance

#### **Description of Internal Monitoring Procedures:**

Cohort 2 and Cohort 3 specific data will be needed on these cohorts for data pull, review for DESE

# Criterion: SE 9 Timeline for determination of eligibility Corrective Action Plan Status: Approved Status Date: 11/09/2021 Correction Status: Not Corrected

#### **Basis for Decision:**

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By March 11, 2022, BPS will provide evidence of training for COSEs on timeline procedures. Evidence will include an agenda, training materials, and sign-in sheets.

By March 11, 2022, BPS will submit evidence of monthly meetings with Assistant Directors of Special Education and COSEs to review timeline data. BPS will also submit

examples of any school-specific proposals designed to address instances of noncompliance.

By May 6, 2022, BPS will submit a second data set of 30 special education student records from Cohorts 2 and 3 in the Indicator 11 section of WBMS. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

# **Progress Report Due Date(s):**

03/11/2022 05/06/2022

Criterion & Topic:	TFM Rating:
SE 12 Frequency of re-evaluation	Partially Implemented

#### **Department TFM Findings:**

A review of student records indicated that re-evaluations are not consistently conducted every three years; in such cases, the parent and district did not agree that the re-evaluation was unnecessary.

#### **Description of Corrective Action:**

Provide PD to Coordinators as follows:

Review evaluation timelines under the MA regulations

Review the process to send timely consent to ensure reevaluation before it is due

Provide strategies to get consent from the parent/guardian

Review the required assessments for a reevaluation

Review the process of ?resetting the dates?

Work with DESE to gather background on this being a viable solution. OSE has been informed by OSE staff that DESE had given the approval for this process.

Create an action plan based on DESE response to ensure that the district is following appropriate procedures and processes

District will have a data-dashboard for compliance for each school that includes compliance data on initials, reevaluations and annual reviews.

ADs will meet monthly with their schools to review the compliance data with a focus on all areas of the data platform and reinforcing/supporting procedural timelines

Title/Role(s) of Responsible Persons:	Expected Date of
Manager of Compliance	Completion:
Assistant Directros of Special Education	07/29/2022

#### **Evidence of Completion of the Corrective Action:**

Power-point, attendance sheet, updated process on OSE BPS website and memos to staff.

Action plan based on DESE response of resetting dates emailed Jaimie Camacho 9/9/21

Addressed at 9/13/21 meeting with DESE

Samples of the data dashboard monitoring compliance and progress

Sample meeting agendas from ADs on the review of compliance data at their schools.

# **Description of Internal Monitoring Procedures:**

School data and file reviews

District will create a template/check off for file data/review.

CORRECTIVE ACTION PLAN APPROVAL SECTION		
Criterion:	Corrective Action Plan Status: Approved	
SE 12 Frequency of re-evaluation	<b>Status Date</b> : 11/09/2021	
	Correction Status: Not Corrected	

#### Basis for Decision:

# **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By January 21, 2022, BPS will ensure that issues of noncompliance for the students identified by the Department are corrected. Specifically, the district will conduct reevaluations and reconvene IEP Teams for the identified students, unless the parent and district agree that the re-evaluation is unnecessary. Evidence will include attendance sheets, updated IEPs, Notices of Proposed School District Action (N1), or documentation indicating the parent and district agreed a re-evaluation was not necessary.

By March 11, 2022, BPS will provide evidence of training for COSEs on re-evaluation procedures. Evidence will include an agenda, training materials, and sign-in sheets.

By March 11, 2022, BPS will submit evidence of monthly meetings with Assistant Directors of Special Education and COSEs to review re-evaluation data. BPS will also submit examples of any school-specific proposals designed to address instances of noncompliance.

By May 6, 2022, BPS will submit the results of an internal review of 30 special education student records across all grade levels to ensure that re-evaluations are conducted every three years. The summary of results will include the number of records found compliant and noncompliant. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

#### **Progress Report Due Date(s):**

01/21/2022 03/11/2022

05/06/2022

Criterion & Topic:	TFM Rating:
SE 13 Progress Reports and content	Partially Implemented

#### Department TFM Findings:

A review of student records indicated that progress reports do not always include written information on the student's progress towards the annual goals in the IEP, and parents do not always receive reports on the student's progress towards reaching the goals set in the IEP at least as often as parents are informed of the progress of non-disabled students.

#### **Description of Corrective Action:**

Provide targeted PD on progress reports emphasizing the following:

Overview of the importance of progress reports

When progress reports are required to be sent

Progress monitoring during the time frame prior to the due date of progress report specifically on each goal. What does it look like, how to track progress?

How to respond if a student has met the goal, or is not making progress towards the goal Translating progress reports

How to complete progress reports in EdPlan

Work with OSE Parent and Family engagement to ensure that families are informed on what to expect with progress reports.

Title/Role(s) of Responsible Persons:	Expected Date of
Manager of Compliance	Completion:
Assistant director of Special Education	07/29/2022

# **Evidence of Completion of the Corrective Action:**

COSE PD on Progress reports:

Agenda, attendance sheet ,powerpoint

Memos to staff with reminders o progress report dates

Information to families on what to expect with progress reports

#### **Description of Internal Monitoring Procedures:**

ADs will work to create spot checks and an accountability system for progress reports with their regions.

District will create a template/check off for file review.

District will create a template/check on for the review.		
CORRECTIVE ACTION PLAN APPROVAL SECTION		
Criterion:	Corrective Action Plan Status: Approved	
SE 13 Progress Reports and content	Status Date: 11/09/2021	
	Correction Status: Not Corrected	
Basis for Decision:		

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By March 11, 2022, BPS will provide evidence of training for COSEs and special education teachers on the appropriate completion of progress reports. The training will not only address how to write progress reports, but also how to effectively track progress towards

IEP goals. Evidence will include an agenda, training materials, and sign-in sheets.

By May 6, 2022, BPS will submit the results of an internal review of 30 special education student records across all grade levels to ensure that progress report requirements are consistently met. The summary of results will include the number of records found compliant and noncompliant. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

# Progress Report Due Date(s):

03/11/2022 05/06/2022

Criterion & Topic:	TFM Rating:
SE 18A IEP development and content	Partially Implemented

#### **Department TFM Findings:**

A review of student records indicated that when an early childhood or elementary special education evaluation sets forth that a student's disability affects social skills development, or when the student's disability makes the student vulnerable to bullying, harassment, or teasing, the IEP does not consistently address the skills and the proficiencies needed to avoid and respond to bullying, harassment, or teasing.

#### **Description of Corrective Action:**

Operational:

Update pg. 48 of Special Education Protocol/Procedurals Manual to include new statement on harassment and teasing.

Update introductory paragraph on pg. 54 of Special Education Protocol/Procedurals Manual, titled Students with Autism Spectrum Disorder to include harassment and teasing.

Update Meeting Summary Checklist to include harassment and teasing.

Ensure all IEPs include proficiencies for bullying, harassment and teasing.

New BPS statement to ensure bullying and teasing is addressed:

IEPs will reflect the new BPS statement: "As per the Massachusetts Bully Prevention and Intervention Law, M.G.L. c.71s370: At the Team meeting on 3/29/2021, the Team reviewed STUDENT?s needs and the Team (including parents) determined that STUDENT is not vulnerable to bullying, harassment, or teasing either as a target or an aggressor. However, if, at any point in the future, such concerns arise, the IEP Team will reconvene to discuss and to address skills needed to avoid and respond to bullying IEP. The whole school bullying prevention curriculum is provided to all students."

IEPs will reflect the new BPS statement: "As per the Massachusetts Bully Prevention and Intervention Law, M.G.L. c.71s370: At the Team meeting on 3/29/2021, the Team reviewed STUDENT?s needs and the Team determines that STUDENT is vulnerable to bullying, harassment, or teasing either as a target or an aggressor. This determination was considered with the development of this IEP."

#### COSE PD:

Targeted COSE Pd highlighting all of the operational updates for harassment and teasing?

	<u> </u>
Title/Role(s) of Responsible Persons:	Expected Date of
Manager of Compliance	Completion:
	07/15/2022

#### **Evidence of Completion of the Corrective Action:**

Operational:

The BPS manual will be updated on page 48 and 54

The Team meeting summary will be updated

IEPs will reflect the new BPS statement: "As per the Massachusetts Bully Prevention and Intervention Law, M.G.L. c.71s370: At the Team meeting on 3/29/2021, the Team reviewed STUDENT?s needs and the Team (including parents) determined that STUDENT is not vulnerable to bullying, harassment, or teasing either as a target or an aggressor. However, if, at any point in the future, such concerns arise, the IEP Team will reconvene

to discuss and to address skills needed to avoid and respond to bullying IEP. The whole school bullying prevention curriculum is provided to all students."

IEPs will reflect the new BPS statement: "As per the Massachusetts Bully Prevention and Intervention Law, M.G.L. c.71s370: At the Team meeting on 3/29/2021, the Team reviewed STUDENT?s needs and the Team determines that STUDENT is vulnerable to bullying, harassment, or teasing either as a target or an aggressor. This determination was considered with the development of this IEP."

#### COSE PD

Agenda, powerpoint, attendance

### **Description of Internal Monitoring Procedures:**

AD?s will monitor compliance.

District will create a template/check off for file review.

#### CORRECTIVE ACTION PLAN APPROVAL SECTION

Criterion: Corrective Action Plan Status: Approved SE 18A IEP development and content Status Date: 11/09/2021

**Correction Status:** Not Corrected

#### Basis for Decision:

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By January 21, 2022, BPS will submit updated procedures to ensure that when an evaluation indicates that a student's disability affects social skills development, or when the student's disability makes the student vulnerable to bullying, harassment, or teasing, the IEP consistently addresses the skills and the proficiencies needed to avoid and respond to bullying, harassment, or teasing. BPS will also update its IEP meeting summary checklist to include discussions around appropriate skills and proficiencies, when required.

By January 21, 2022, BPS will provide evidence of training for COSEs on the updated procedures. Evidence will include an agenda, training materials, and sign-in sheets.

By January 21, 2022, BPS will ensure that issues of noncompliance for the students identified by the Department are corrected. Specifically, the district will reconvene the IEP Teams for the identified students and address any skills and proficiencies needed to avoid and respond to bullying, harassment, or teasing. Evidence will include attendance sheets, updated IEPs, and Notices of Proposed School District Action (N1).

By May 6, 2022, BPS will submit the results of an internal review of 20 special education student records in early childhood and elementary education. The summary of results will include the number of records found compliant and those found noncompliant. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

#### Progress Report Due Date(s):

01/21/2022

03/11/2022 05/06/2022

Criterion & Topic:	TFM Rating:
SE 20 Least restrictive program selected	Partially Implemented

#### **Department TFM Findings:**

An analysis of data and staff interviews indicated that IEP Teams do not always consider the least restrictive environment for students, with consideration given to any potential harmful effect on the student or on the quality of services that he or she needs. Data demonstrated the following:

Approximately 63.9% of students are in full inclusion or partial inclusion placements, a rate lower than the state rate at approximately 79.9%.

Approximately 29.6% of eligible students are enrolled in substantially separate placements, a rate more than twice that of the state at approximately 13.5%.

An analysis of data also demonstrated high rates of placements of eligible students of color in substantially separate programs:

African American students: 36.3%

Hispanic students: 27.3% Asian students: 30.0% White students: 19.5%

A review of student records indicated that if a student is removed from the general education classroom at any time, the Team does not always state in the IEP Nonparticipation Justification statement 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:**

COSE and Service Provider PD:

When an IEP accepted, full or partial, the COSE will be required to send an email to all providers that the IEP has been accepted/partially accepted.

COSE will include a read receipt or obtain acknowledgement from service providers

Ensure that all services providers understand the scope of services and their role

Continued work with PCG for possible revision of notification of responses AD?s monitor for compensatory services
OSE review of results of the process

Title/Role(s) of Responsible Persons:	Expected Date of
Manager of Compliance	Completion:
Assistant Directors	01/30/2022

# **Evidence of Completion of the Corrective Action:**

Timely implementation of agreed-upon services

Response of service providers will demonstrate knowledge of appropriate services and be able to start providing accepted services.

Start dates of services based on accepted IEP.

#### **Description of Internal Monitoring Procedures:**

ADs aill monitor school based implementation

District will create a template/check off for file review.

CORRECTIVE ACTION PLAN APPROVAL SECTION			
Criterion: SE 20 Least restrictive program	Corrective Action Plan Status: Partially Approved		
selected	Status Date: 11/09/2021		
	Correction Status: Not Corrected		

#### Basis for Decision:

While the district addressed the consideration of the least restrictive environment in the SE 34 CAP submission, they did not address the need to ensure that IEP Teams always state in the IEP Nonparticipation Justification statement why removal from the general education classroom is considered critical to a student's program.

#### **Department Order of Corrective Action:**

Revise the IEP Nonparticipation Justification statements for the students identified by the Department, provide training to appropriate staff, and conduct a record review.

#### Required Elements of Progress Report(s):

Please see SE 34 for progress reports related to the least restrictive environment.

By March 11, 2022, BPS will provide evidence of training to COSEs to ensure IEP Teams always state in the IEP Nonparticipation Justification statement why removal is considered critical to a 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. Evidence will include an agenda, training materials, and sign-in sheets.

By May 6, 2022, BPS will submit evidence of an internal review of 30 special education student records across all grade levels to ensure that if a student is removed from the general education classroom at any time, the IEP Nonparticipation Justification statement explains why the removal is considered critical to the student's program. The summary of results will include the number of records found compliant and those found noncompliant. For any records identified with noncompliance, BPS will identify appropriate corrective action to address the noncompliance.

# Progress Report Due Date(s):

03/11/2022 05/06/2022

Criterion & Topic:	TFM Rating:
SE 22 IEP implementation and availability	Partially Implemented

#### Department TFM Findings:

Staff interviews indicated that when the IEP has been accepted in whole or in part by the student's parent, the district does not always provide the mutually agreed upon services without delay. Staff interviews indicated that each teacher and provider described in the IEP is not always informed of his or her specific responsibilities related to the implementation of the student's IEP and the specific accommodations, modifications, and supports that must be provided to the student under it.

#### **Description of Corrective Action:**

COSE and Service Provider PD:

When an IEP accepted, full or partial, the COSE will be required to send an email to all providers that the IEP has been accepted/partially accepted.

COSE will include a read receipt or obtain acknowledgement from service providers

Ensure that all services providers understand the scope of services and their role

Continued work with PCG for possible revision of notification of responses AD?s monitor for compensatory services OSE review of results of the process

Title/Role(s) of Responsible Persons:

Expected Date of Completion: 06/15/2022

Assistant Directors

Manager of Compliance

#### **Evidence of Completion of the Corrective Action:**

Timely implementation of agreed-upon services

Response of service providers will demonstrate knowledge of appropriate services and be able to start providing accepted services.

Start dates of services based on accepted IEP.

#### **Description of Internal Monitoring Procedures:**

ADs aill monitor school based implementation

District will create a template/check off for file review.

#### **CORRECTIVE ACTION PLAN APPROVAL SECTION**

Criterion: Corrective Action Plan Status: Approved
SE 22 IEP implementation and availability Correction Status: Not Corrected

**Basis for Decision:** 

**Department Order of Corrective Action:** 

#### **Required Elements of Progress Report(s):**

By March 11, 2022, BPS will submit a copy of a tracking template designed to assist Assistant Directors of Special Education in monitoring the implementation of student IEPs and the specific accommodations, modifications, and supports that must be provided to each student.

By March 11, 2022, BPS will provide evidence of IEP implementation training to COSEs and service providers. Evidence will include an agenda, training materials, and sign-in sheets.

By May 6, 2022, BPS will submit the results of a review of completed tracking templates. For instances of noncompliance, Assistant Directors of Special Education will work with school-based staff to ensure the appropriate implementation of specific accommodations, modifications, and supports.

# **Progress Report Due Date(s):**

03/11/2022 05/06/2022

Criterion & Topic:	TFM Rating:
SE 25 Parental consent	Partially Implemented

#### **Department TFM Findings:**

A review of student records and staff interviews indicated that when parental consent to the services proposed on a student's IEP is required, and the parent fails or refuses to consent, the district does not routinely secure consent from the parent through multiple attempts using a variety of methods or consistently document its efforts to obtain consent.

#### **Description of Corrective Action:**

Provide PD to COSE on:

District process to obtain parent?s signature to consent implementation of the IEP: District must make multiple attempts:

1st attempt: Parent has 30 days to review the IEP 2nd Attempt: Send out 30 days after first sent date

3rd attempt: 40 days after first sent date; send certified mail

After 30 days considered rejected and sent to BSEA, BUT continue to get signature

District to use multiple modalities to obtain signature:

EdPlan portal, paper copy, email, telephone, parent teachers night

If student is attending, seek assistance of school staff: teachers, counselors, service providers, administration

Inform your school leader of IEPs you are not able to get signed

If student is not attending, seek assistance with residency verification

If you have a progress meeting or a Team meeting and the IEP is still not signed, work with the family to get it signed at the meeting

If IEP is still not signed at the time of the next meeting, have the parent sign the document(s) at that meeting

Document all attempts in the Parent Contact Log and upload certified mail receipt and other documents used to seek signatures in EdPlan

Title/Role(s) of Responsible Persons:	Expected Date of
Manager of Compliance	Completion:
Assistant Directors	07/29/2022

#### **Evidence of Completion of the Corrective Action:**

Documentation of multiple attempts

District process will be re-presented:

To COSE

To Clerks

COSE and Clerks will be provided with a signature tracker to use for organization

COSE and Clerks will be provided with process for sending certified mail

COSE and Clerks will be provided with process to conduct residency inquiry

COSE PD

Agenda, powerpoint, attendance

#### **Description of Internal Monitoring Procedures:**

Monitor compliance with a data pull comparing by school

Assistant Directors will consult with the COSE based on the data pull

District will create a template/check off for on-site school file review

#### CORRECTIVE ACTION PLAN APPROVAL SECTION

Criterion:
SE 25 Parental consent
Corrective Action Plan Status: Approved
Status Date: 11/08/2021
Correction Status: Not Corrected

#### Basis for Decision:

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By January 21, 2022, BPS will submit signed IEPs or documentation of attempts to obtain consent for the students identified by the Department.

By March 11, 2022, BPS will provide evidence of training for COSEs on parental consent procedures. The training will address the need to make multiple attempts through a variety of modalities to obtain required consent. Evidence will include an agenda, training materials, and sign-in sheets.

By May 6, 2022, BPS will submit the results of an internal review of 30 special education student records across all grade levels to ensure that parental consent is obtained. In instances where consent is not obtained, multiple attempts to obtain consent must be documented. The summary of results will include the number of records found compliant and those found noncompliant. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

#### **Progress Report Due Date(s):**

01/21/2022

03/11/2022

05/06/2022

Criterion & Topic: TFM Rating:

SE 29 Communications are in English and primary language of home

Partially Implemented

#### **Department TFM Findings:**

A review of student records and staff interviews indicated that written communications, including IEP summary notes, annual review academic reports, Educational Assessments A and B, psychological reports, and specific learning disability components, are not consistently translated for parents in the primary language of the home.

#### **Description of Corrective Action:**

BPS is working with PCG/EdPlan to discuss moving to purchase the translation component of EdPlan to support the need.

#### COSE PD:

Review the process for translation and interpretation for all documents

Provide strategies and resources to streamline the process

Review the BPS platforms in place to support interpretations and translations

Review the process of uploading all translated documents into EdPlan

Title/Role(s) of Responsible Persons:

Manager of Compliance

Expected Date of Completion: 07/29/2022

# **Evidence of Completion of the Corrective Action:**

IEPs are provided in English and primary home language

# **Description of Internal Monitoring Procedures:**

ADs will complete file reviews

District will create a template/check off for on-site school file review

#### CORRECTIVE ACTION PLAN APPROVAL SECTION

**Criterion:**SE 29 Communications are in English

and primary language of home

Corrective Action Plan Status: Approved
Status Date: 11/09/2021
Correction Status: Not Corrected

#### Basis for Decision:

#### **Department Order of Corrective Action:**

# Required Elements of Progress Report(s):

By January 21, 2022, BPS will provide translations of written communications in the primary language of the home for the families identified by the Department. Evidence will include translated documents.

By March 11, 2022, BPS will provide evidence of training for COSEs on translation procedures. Evidence will include an agenda, training materials, and sign-in sheets.

By May 6, 2022, BPS will submit the results of an internal review of 30 special education student records across all grade levels to ensure that written communications are

provided in the primary language of the home. The summary of results will include the number of records found compliant and those found noncompliant. For any noncompliant records, BPS will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

### Progress Report Due Date(s):

01/21/2022 03/11/2022 05/06/2022

Criterion & Topic: TFM Rating:

SE 34 Continuum of alternative services and placements | Partially Implemented

#### **Department TFM Findings:**

See SE 20 regarding the lack of inclusive opportunities for students within the special education continuum of alternative services and placements.

# **Description of Corrective Action:**

BPS will create a cross-functional group who will do a root cause analysis into this specific problem. Further action steps will be determined based on the results of the root cause analysis.

Title/Role(s) of Responsible Persons:

Assistant Superintendent of Special Education

**Expected Date of Completion:** 01/30/2022

#### **Evidence of Completion of the Corrective Action:**

Team meeting summaries

Meeting Agendas

### **Description of Internal Monitoring Procedures:**

Scheduled check-in on progress with DESE

#### **CORRECTIVE ACTION PLAN APPROVAL SECTION**

Criterion: Corrective Action Plan Status: Approved

SE 34 Continuum of alternative
services and placements

Status Date: 11/09/2021
Correction Status: Not Corrected

#### Basis for Decision:

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By December 17, 2021, BPS will hold the first meeting of a cross-functional team tasked with addressing the concerns identified in the TFM SE 20 and SE 34 findings and the BPS and DESE Memorandum of Understanding (MOU) Priority Initiative 3: Improving Education Services to Students with Disabilities. The district will submit an agenda and the names and titles of the members of the cross-functional team. At this time, the district and the Department will establish a schedule for ongoing consultation to discuss timelines and action steps. Subsequent progress reports will be based on the findings of the root cause analysis.

# Progress Report Due Date(s):

12/17/2021

03/11/2022

<b>Criterion &amp; Topic:</b> SE 35 Assistive technology: specialized materials.	terials and equipment	TFM Rating: Partially Implemented
Department TFM Findings:		
A review of student records and staff interv	views indicated that the	IFP Team does not
always consider the communication needs of		
communicate effectively through oral speed		
augmentative and alternative communication		iways consider
Description of Corrective Action:	J. 1.	
Update to Team Meeting Summary Sheet		
PLEB B Training at COSE PD		
Statement under additional information tha	at augmentative and alte	ernative communication
was discussed and ???	it augmentative and and	sinative communication
Was disoussed and TT		
Embed in Team meeting Summary (BPS wi	ll update):	
Do you have any significant concerns about		his/her current
curriculum given the accommodations and		
How to respond/document in the IEP (BPS	will work with PCG to ac	dd to EdPlan:
No: For students with AAC needs, the follow		
The above listed communication supports a	•	
language skills and communication for func		
No: For students with AT needs, the followi		
The above listed UDL tools and instruction		
student?s functional access to the curriculu		J
Yes: The following concerns were expressed		st concerns
below)		To
address these concerns an assistive techno	logy consultation/evalua	ation has been
requested		
Title/Role(s) of Responsible Persons:		Expected Date of
Manager of Compliance		Completion:
Assistive Technology Team		07/29/2022
<b>Evidence of Completion of the Corrective</b>	ve Action:	
Agenda, attendance sheet ,powerpoint		
Updates to EdPlan		
Updated Team meeting summary		
Description of Internal Monitoring Procedures:		
District will create a template/check off for file review. ADs will conduct file reviews		
quarterly to ensure their schools are following the process.		
CORRECTIVE ACTION PLAN APPROVAL SECTION		
Criterion: C	Corrective Action Plan	Status: Approved
SE 35 Assistive technology: specialized Status Date: 11/09/2021		
materials and equipment Correction Status: Not Corrected		
Basis for Decision:	20201101	1 1 2 1 2 1 1 2 1 2 1 1 2 1 2 1 2 1 2 1

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By January 21, 2022, BPS will update the IEP meeting summary and IEP templates to ensure that Teams always consider the communication needs for all students.

By January 21, 2022, BPS will provide evidence of training for COSEs on assistive technology procedures and document updates. Evidence will include an agenda, training materials, and sign-in sheets.

By January 21, 2022, BPS will ensure that issues of noncompliance for the students identified by the Department are corrected. Specifically, the district will reconvene IEP Teams to consider the communication needs of each student. For the students who cannot communicate effectively through oral speech, the Team will consider augmentative and alternative communication. Evidence will include attendance sheets, updated IEPs, and Notices of Proposed School District Action (N1).

By May 6th, 2022, BPS will submit the results of an internal review of 30 special education student records across all grade levels. The summary of results will include the number of records found compliant and those found noncompliant. For any noncompliant records, the district will conduct a root cause analysis and identify the appropriate corrective action to address the noncompliance.

#### **Progress Report Due Date(s):**

01/21/2022

03/11/2022

04/20/2022

05/06/2022

CORRECTIVE ACTION PLAN				
Criterion & Topic:		TFM Rating:		
SE 39 Procedures used to provide service	•	Partially Implemented		
enrolled in private schools at private exp	ense			
Department TFM Findings:				
A review of documentation indicated tha				
ensure the provision of services to eligib	ie students enrolled in priv	rate schools at private		
expense.				
Description of Corrective Action:				
	BPS will create a team to review the current process for students parentally place in private schools. The team will review the following and create a strategic plan to ensure			
	e following and create a Str	rategic plan to ensure		
the provision is being met::				
Implementation of IEP services	nuino plano			
Determination and implementation of sel	vice plans			
Implementation of Child Find Distribution of funds from Equitable Serv	vices			
Providing	ices			
Ensuring students are not marked as ?in	active? when they are her	noschoolod or transition		
to private school	active: when they are not	riescribbled of transition		
Management of ID numbers for non-residual	dent students			
BPS will create a process and procedure		hare services for the		
district and for parents	galactor prop-ortionate 3	That C 3CT VICCS FOR THE		
BPS will identify roles and responsibilities	s for staff			
BPS will evaluate how they initially imple		hat changes needs to		
be made for SY22-23	mented propositate and w	That offariges freeds to		
Title/Role(s) of Responsible Persons	*:	Expected Date of		
Assistant Superintendent of Special Educ		Completion:		
Manager of Compliance		08/15/2022		
<b>Evidence of Completion of the Correct</b>	ctive Action:			
Schedule for Child Find				
Schedule for Consultation meeting				
Invites to consultation meetings				
Affirmation letters from consultation med	etings			
Student service plans, for students recei-	ving services			
Description of Internal Monitoring P				
District will monitor progress by collaboration	ating with the private scho	ools		
District will monitor progress by having a	a system that meets the ti	melines as laid out by		
DESE.				
CORRECTIVE ACTION PLAN APPROVAL SECTION				
Criterion:	Corrective Action Plan	Status: Approved		
SE 39 Procedures used to provide		us Date: 11/09/2021		
services to eligible students enrolled in		Status: Not Corrected		
private schools at private expense		1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		
Basis for Decision:				

**Department Order of Corrective Action:** 

# Required Elements of Progress Report(s):

By December 17, 2021, BPS will convene a working group to evaluate current practices related to the provision of services for eligible students enrolled in private schools at private expense. The team will develop a set of procedures that identifies staff responsibilities and includes methods to monitor completion of all required activities.

By March 11, 2022, BPS will provide evidence of proportionate share training for all relevant staff. The training will address the specific roles and responsibilities for each staff member. Evidence will include an agenda, training materials, and sign-in sheets. Additional progress reports may be required based on upon any concerns addressed during monthly Equitable Services meetings with the Department.

### **Progress Report Due Date(s):**

12/17/2021 03/11/2022

#### **Criterion & Topic:**

**TFM Rating:** 

SE 40 Instructional grouping requirements for students aged five and older

Partially Implemented

#### **Department TFM Findings:**

A review of documents indicated that several classrooms throughout the district exceed the maximum instructional grouping student to staff ratios for eligible students receiving services outside the general education classroom. In such cases, the district did not provide written notification to the Department or parents of all group members of the decision to increase the instructional group size and the reasons for such decision.

#### **Description of Corrective Action:**

Work with ASPEN to create a flag if a student is assigned to a class and exceeds the instructional grouping; create a system where an administrator would have to override to ensure appropriate staffing. (need to see if this can be done. Has been done in other districts)

PD to school leaders, COSE and guidance

Form to report when school is out of compliance highlighting the reason why

#### Title/Role(s) of Responsible Persons:

Assistant Superintendent of Special Education

**Expected Date of Completion:** 

08/25/2022

# **Evidence of Completion of the Corrective Action:**

Agenda, attendance sheet ,powerpoint

Agenda, attendance sheet ,powerpoint

Review sampling of schedules where the instructional groupings were found out of compliance

#### **Description of Internal Monitoring Procedures:**

Stop gap put into place with ASPEN that will not allow for us to exceed without approval.

#### **CORRECTIVE ACTION PLAN APPROVAL SECTION**

**Criterion:** 

SE 40 Instructional grouping requirements for students aged five and older

Corrective Action Plan Status: Approved

Status Date: 11/09/2021 Correction Status: Not Corrected

#### Basis for Decision:

### **Department Order of Corrective Action:**

### Required Elements of Progress Report(s):

By December 17, 2021, BPS will submit an updated list of all special education instructional groupings for students aged five and older. If any groupings do not meet requirements, BPS will provide written notification to the Department and the parents of all group members of the decision to increase the instructional group size and the reasons for such decision.

Subsequent progress reports will be based on any identified noncompliance with instructional group requirements.

Progress Report Due Date(s):

12/17/2021 02/04/2022

Criterion & Topic: TFM Rating:

SE 41 Age span requirements Partially Implemented

#### **Department TFM Findings:**

A review of documents indicated that in many instructional groupings throughout the district, the ages of the youngest and oldest students differ by more than 48 months. In such cases, the district did not submit written requests for approval of a wider age range to the Department.

# **Description of Corrective Action:**

Work with ASPEN to create a flag if a student is assigned to a class and exceeds the age span; create a system where an administrator would have to override to ensure a waiver or restructuring of classes. (need to see if this can be done. Has been done in other districts)

PD to school leaders, COSE and guidance

Train staff on the Age Span Requirements and the process of a waiver

Create a form for School Leaders to complete for reporting.

Create a monitoring system for completed and approved waivers.

#### Title/Role(s) of Responsible Persons:

Assistant Superintendent of Special Education

Expected Date of Completion: 08/25/2022

#### **Evidence of Completion of the Corrective Action:**

Agenda, attendance sheet ,powerpoint

Review sampling of schedules where the instructional groupings were found out of compliance

#### **Description of Internal Monitoring Procedures:**

Stop gap put into place with ASPEN that will not allow for us to exceed without approval. A management system for all requested and approved waivers.

### **CORRECTIVE ACTION PLAN APPROVAL SECTION**

Criterion:
SE 41 Age span requirements
Corrective Action Plan Status: Approved
Status Date: 11/09/2021
Correction Status: Not Corrected

#### **Basis for Decision:**

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By December 17, 2021, BPS will submit an updated list of the age spans in all special education instructional groupings for students aged five and older. If any groupings exceed a 48-month age span, BPS will make a written request to the Department for waiver.

Subsequent progress reports will be based on any identified noncompliance with age span requirements.

Progress Report Due Date(s):

12/17/2021

02/04/2022

Criterion & Topic: TFM Rating:

SE 42 Programs for young children three and four years of age | Partially Implemented

#### **Department TFM Findings:**

A review of documents indicated that 17 inclusionary preschool programs and one substantially separate preschool program exceed the maximum instructional grouping student to staff ratios.

#### **Description of Corrective Action:**

There will be a task force created to review this criterion area. At this meeting the district will review the following:

#### Data submitted to DESE

The general requirements will be reviewed to ensure a common understanding of inclusion

A plan will be created to rectify the classrooms

The team review budget implications

Based on the district's misunderstanding of inclusion, this will also be connected to SE 20 and SE 34.

Title/Role(s) of Responsible Persons:

Assistant Superintendent of Special Education

Expected Date of Completion:

**Completion:** 08/25/2022

#### **Evidence of Completion of the Corrective Action:**

Meeting agendas

Strategic plan for correcting this area

#### **Description of Internal Monitoring Procedures:**

The strategic plan will have timelines embedded to keep the work group on point with progress.

#### **CORRECTIVE ACTION PLAN APPROVAL SECTION**

Criterion:

SE 42 Programs for young children three and four years of age

Corrective Action Plan Status: Approved
Status Date: 11/09/2021
Correction Status: Not Corrected

#### Basis for Decision:

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By December 17, 2021, BPS will hold the first meeting of a newly established task force to address instructional grouping concerns. The task force will also analyze current district practices regarding special education placements in preschool to ensure students are always placed in the least restrictive environment.

By March 11, 2022, BPS will conduct training with appropriate special education personnel on instructional grouping requirements for preschool students, including those who solely receive related services. The training will address the comprehensive definition of inclusionary settings and substantially separate settings and the ratios required for such

settings. Evidence will include an agenda, training materials, and sign-in sheets.

By March 11, 2021, BPS will submit an updated list of groupings for all preschool programs in the district. For any classes that do not meet the required grouping ratios, the district will identify appropriate corrective action to address the noncompliance.

# Progress Report Due Date(s):

12/17/2021 03/11/2022

Criterion & Topic:TFM Rating:SE 43 Behavioral interventionsPartially Implemented

#### **Department TFM Findings:**

A review of student records and staff interviews indicated that for a student whose behavior impedes his or her learning or the learning of others, the district does not consistently consider the use of positive behavioral interventions and supports to address that behavior.

#### **Description of Corrective Action:**

OSE will work with the MTSS and SST work group to develop guidance for all schools on tiered behavioral interventions.

As part of this training, schools will be trained to use Panorama, a data platform, to track student data and tiered interventions over a period of time.

Title/Role(s) of Responsible Persons:Expected Date ofAssistant Superintendent of Special EducationCompletion:Director of Academics and Professional Learning08/25/2022

# **Evidence of Completion of the Corrective Action:**

MTSS Work Group Agendas

MTSS Work group implementation plan

Analysis of referral data

# **Description of Internal Monitoring Procedures:**

We will create a system for ongoing analysis of referral data.

# CORRECTIVE ACTION PLAN APPROVAL SECTION

Criterion:
SE 43 Behavioral interventions
Corrective Action Plan Status: Approved
Status Date: 11/09/2021
Correction Status: Not Corrected

#### Basis for Decision:

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

Please see CR 18 for progress reports related to behavioral interventions.

### **Progress Report Due Date(s):**

12/17/2021

03/11/2022

12/23/2022

Criterion & Topic: TFM Rating:

CR 18 Responsibilities of the school principal Partially Implemented

#### **Department TFM Findings:**

A review of documents and staff interviews indicated that although the district developed a curriculum accommodation plan, staff are not familiar with the plan, and it is not consistently implemented across the district. Furthermore, staff interviews indicated that students are not always provided with appropriate services and support within the general education classroom including, but not limited to, direct and systematic instruction in reading and services to address the needs of children whose behavior may interfere with learning.

#### **Description of Corrective Action:**

BPS will create a working group to review the Criterion 18 and the current DCAP.

The work group will be charged with creating a DCAP that will provide universal accommodations and resources that will be connected to the work of the MTSS team.

The working group will collaborate with the MTSS team to ensure that the DCAP is embedded in the tiers of interventions.

The DCAP working group will provide training to school leaders on the DCAP. School leaders will be provided resources for providing training to their schools around the DCAP.

#### **DCAP**

#### Title/Role(s) of Responsible Persons:

Assistant Superintendent of of Academics and Professional Learning

**Expected Date of Completion:** 08/25/2022

#### **Evidence of Completion of the Corrective Action:**

Completed DCAP

Agenda and PowerPoint on the DCAP training to School Leaders

#### **Description of Internal Monitoring Procedures:**

Evidence of theuse of the DCAP will be seen through the MTSS/SST(Student Support Team) process.

#### CORRECTIVE ACTION PLAN APPROVAL SECTION

Criterion: Corrective Action Plan Status: Approved Status Date: 11/09/202

CR 18 Responsibilities of the school principal Status Date: 11/09/2021 Correction Status: Not Corrected

Basis for Decision:

#### **Department Order of Corrective Action:**

#### Required Elements of Progress Report(s):

By December 17, 2021, BPS will convene a working group to review and revise behavioral interventions for special and general education students. Universal accommodations and services within the general education classroom, including direct and systematic reading

instruction, will also be addressed. The working group will collaborate with the district's MTSS team and SST team to ensure the integration of DCAP interventions and MTSS. Evidence will include an agenda, meeting materials, the updated DCAP, and signed attendance sheets.

By March 11, 2022, BPS will submit evidence of training to all relevant staff on positive behavioral interventions and supports (PBIS) and universal accommodations and services, as described in the DCAP. The training will provide staff with an overview of the newly developed guidance, PBIS's relationship to the DCAP and MTSS, and instruction on tracking tiered interventions and universal accommodations in the district's database. Evidence will include an agenda, training materials, and sign-in sheets.

BPS, in collaboration with the working group, will also develop an internal monitoring system to track referral data and the rates of success of various forms of behavioral interventions and services for special and general education students. BPS will also track the provision of general education accommodations and services, including direct and systematic reading instruction.

By December 23, 2022, BPS will implement their internal monitoring system and provide a summary of the results. The summary of results will describe the effectiveness of behavioral interventions for special and general education students. It will also describe the effectiveness of accommodations made within the general education classroom, including direct and systematic reading instruction. The district will develop and submit an action plan to address any areas of concern.

# **Progress Report Due Date(s):**

12/17/2021

03/11/2022

12/23/2022