

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY  
EDUCATION  
Public School Monitoring**

**TIERED FOCUSED MONITORING REVIEW**

**CORRECTIVE ACTION PLAN**

**Charter School or District: Worcester**

**TFM Onsite Year: 2021-2022**

**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 Tiered Focused Monitoring Final Report dated 04/02/2022.*

**Mandatory One-Year Compliance Date: 04/02/2023**

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

<b>Criterion</b>	<b>Criterion Title</b>	<b>TFM Rating</b>
SE 7	Transfer of parental rights at age of majority and student participation and consent at the age of majority	Partially Implemented
SE 8	IEP Team composition and attendance	Partially Implemented

**TIERED FOCUSED MONITORING REVIEW  
CORRECTIVE ACTION PLAN**

<p><b>Criterion &amp; Topic:</b> SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority</p>	<p><b>TFM Rating:</b> Partially Implemented</p>
<p><b>Department TFM Findings:</b> A review of student records indicated that at least one year prior to the student reaching age 18, the district does not consistently inform the student and parent/guardian of the rights that will transfer from the parent/guardian to the student upon the student's 18th birthday. In addition, upon reaching the age of majority, the district does not always obtain consent from the student with decision-making authority to continue his or her special education program.</p>	
<p><b>Description of Corrective Action:</b> The Worcester Public Schools conducted an analysis of data, policies, and procedures to determine the root causes for identified issues of noncompliance. Based upon that analysis the district, with technical support from the Department, has identified corrective actions necessary to address the root causes and ensure future compliance to meet the requirements related to the transfer of parental rights at age of majority and student participation and consent at the age of majority. Worcester Public Schools will complete the following corrective actions:</p> <ul style="list-style-type: none"> <li>- By October 1, 2022, the district will update its procedures to ensure that at least one year prior to the student reaching age 18, the district informs the student and parent/guardian of the rights that will transfer from the parent/guardian to the student upon the student's 18th birthday. Additionally, the procedures will ensure that, upon reaching the age of majority, the district always obtains consent from the student with decision-making authority to continue his or her special education program. The procedures will include an internal monitoring system to ensure future compliance.</li> <li>- By December 1, 2022, the district will ensure all relevant staff receive training on the revised procedures.</li> <li>- By March 1, 2023, the district will conduct a review of a representative sample of 10 student records, subsequent to corrective actions, to ensure full compliance.</li> </ul>	
<p><b>Title/Role(s) of Responsible Persons:</b> Kay Seale- Manager of Special Education</p>	<p><b>Expected Date of Completion:</b> 03/31/2023</p>
<p><b>Evidence of Completion of the Corrective Action:</b> Evidence of completed corrective actions will include:</p> <ul style="list-style-type: none"> <li>- Revised procedures to ensure full compliance to the requirements related to the transfer of parental rights at age of majority and student participation and consent at the age of majority.</li> <li>- Evidence of staff training will include; training materials, meeting agendas, and attendance sheets.</li> <li>- The results of a review of a representative sample of student records indicating 100% compliance.</li> </ul>	
<p><b>Description of Internal Monitoring Procedures:</b> The Assistant Director of Special Education and the Department Head for Evaluation Team Coordination (ETC) will review the transfer of rights procedures at the first ETC meeting of each school year. Additionally, the Assistant Director of Special Education will conduct an annual review of student records in March of each school year to ensure future compliance. The review will evaluate the records of a representative sample of students</p>	

who have reached the age of majority from across the district to determine whether, at least one year prior to the student reaching age 18, the district informed the student and parent/guardian of the rights that will transfer from the parent/guardian to the student upon the student's 18th birthday. In addition, upon reaching the age of majority, the district has obtained consent from the student with decision-making authority to continue his or her special education program, unless there is a court appointed guardian. If there are any instances of non-compliance identified, the Assistant Director of Special Education will conduct a root cause analysis and take appropriate corrective actions to address the issue(s) based upon that analysis.

**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:** 05/12/2022  
**Correction Status:** Not Corrected

**Basis for Decision:**

**Department Order of Corrective Action:**

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

By October 3, 2022, the district will submit updated procedures to ensure that at least one year prior to the student reaching age 18, the district informs the student and parent/guardian of the rights that will transfer from the parent/guardian to the student upon the student's 18th birthday. Additionally, the procedures will ensure that, upon reaching the age of majority, the district always obtains consent from the student with decision-making authority to continue his or her special education program. The procedures will include an internal monitoring system to ensure future compliance.

By November 7, 2022, the district will submit evidence of training provided to relevant staff on the revised procedures. Evidence will include training materials, meeting agendas, and attendance sheets.

By January 9, 2023, the district will conduct a review of a representative sample of student records, subsequent to corrective actions, to ensure full compliance. Evidence of completion will include the results of the student record review indicating: the number of student records reviewed, the number of records in compliance, and for any records not in compliance, the root cause of the non-compliance and the district's plan to remedy the non-compliance. Please note that when monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the record review; b) Date of the review; c) Name of person(s) who conducted the review, their roles(s), and their signature(s).

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

10/03/2022  
11/07/2022  
01/09/2023

**TIERED FOCUSED MONITORING REVIEW  
CORRECTIVE ACTION PLAN**

<b>Criterion &amp; Topic:</b> SE 8 IEP Team composition and attendance	<b>TFM Rating:</b> Partially Implemented
<b>Department TFM Findings:</b> A review of student records and staff interviews indicated that when a Team member does not attend the Team meeting, the district does not always follow the required procedures, including the following: Documenting, in writing, that the district and parent agree the attendance of the Team member is not necessary because the member's area of the curriculum or related services is not being modified or discussed; or Documenting, in writing, the district and parent agree to excuse a required Team member's participation and the excused member provides written input into the development of the IEP to the parent and the IEP Team prior to the meeting.	
<b>Description of Corrective Action:</b> The Worcester Public Schools conducted an analysis of data, policies, and procedures to determine the root causes for identified issues of noncompliance. Based upon that analysis the district, with technical support from the Department, has identified corrective actions necessary to address the root causes and ensure future compliance to meet the requirements related to IEP Team composition and attendance. Worcester Public Schools will complete the following corrective actions: - By October 1, 2022, the district will update its procedures to ensure that when a Team member does not attend the Team meeting, the district documents, in writing, that the district and parent agree the attendance of the Team member is not necessary because the member's area of the curriculum or related services is not being modified. Likewise, the procedures will ensure that the district documents, in writing, that the district and parent agree to excuse a required Team member's participation and the excused member provides written input into the development of the IEP to the parent and the IEP Team prior to the meeting. The procedures will include an internal monitoring system to ensure future compliance. - By December 1, 2022, the district will ensure all relevant staff receive training on the revised procedures. - By March 1, 2023, the district will conduct a review of a representative sample of student records, subsequent to corrective actions, to ensure full compliance.	
<b>Title/Role(s) of Responsible Persons:</b> Kay Seale-Manager of Special Education	<b>Expected Date of Completion:</b> 03/31/2023
<b>Evidence of Completion of the Corrective Action:</b> Evidence of completed corrective actions will include: - Revised procedures to ensure full compliance to the requirements related to IEP Team composition and attendance. - Evidence of staff training will include; training materials, meeting agendas, and attendance sheets. - The results of a review of a representative sample of student records indicating 100% compliance.	
<b>Description of Internal Monitoring Procedures:</b> The Assistant Director of Special Education and the Department Head for Evaluation Team Coordination (ETC) will review the procedures to ensure that when a Team member does not attend the Team meeting, the district documents, in writing, that the district and	

parent agree the attendance of the Team member is not necessary because the member's area of the curriculum or related services is not being modified. Additionally, the Assistant Director of Special Education will conduct an annual review of student records in March of each school year to ensure future compliance. The review will evaluate the records of a representative sample in which a team member was excused for all or part of the meeting. If there are any instances of non-compliance identified, the Assistant Director of Special Education will conduct a root cause analysis and take appropriate corrective actions to address the issue(s) based upon that analysis.

**CORRECTIVE ACTION PLAN APPROVAL SECTION**

**Criterion:**  
SE 8 IEP Team composition and attendance

**Corrective Action Plan Status:** Approved  
**Status Date:** 05/10/2022  
**Correction Status:** Not Corrected

**Basis for Decision:**

**Department Order of Corrective Action:**

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

By October 3, 2022, the district will submit updated procedures to ensure that when a Team member does not attend the Team meeting, the district documents, in writing, that the district and parent agree the attendance of the Team member is not necessary because the member's area of the curriculum or related services is not being modified. Likewise, the procedures will ensure that the district documents, in writing, that the district and parent agree to excuse a required Team member's participation and the excused member provides written input into the development of the IEP to the parent and the IEP Team prior to the meeting. The procedures will include an internal monitoring system to ensure future compliance.

By November 7, 2022, the district will submit evidence of training provided to relevant staff on the revised procedures. Evidence will include training materials, meeting agendas, and attendance sheets.

By January 9, 2023, the district will conduct a review of a representative sample of student records, subsequent to corrective actions, to ensure full compliance. Evidence of completion will include the results of the student record review indicating: the number of student records reviewed, the number of records in compliance, and for any records not in compliance, the root cause of the non-compliance and the district's plan to remedy the non-compliance. Please note that when monitoring the district must maintain the following documentation and make it available to the Department upon request: a) List of student names and grade levels for the record review; b) Date of the review; c) Name of person(s) who conducted the review, their roles(s), and their signature(s).

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