**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**Public School Monitoring**

**Integrated Monitoring Review**

# Corrective Action Plan

Local Education Agency: Westford Public Schools

Monitoring Onsite Year: 2024-2025

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 Special Education and Civil Rights Monitoring Report dated 08/01/2025.

**Mandatory One-Year Compliance Date:** **08/01/2026**

## Summary of Required Corrective Action Plans

**Criterion:** SE 3

**Criterion Title:** Special requirements for determination of specific learning disability

**Rating:** Partially Implemented

**Criterion:** SE 7

**Criterion Title:** Transfer of parental rights at age of majority and student participation and consent at the age of majority

**Rating:** Partially Implemented

**Criterion:** SE 9

**Criterion Title:** Timeline for determination of eligibility

**Rating:** Partially Implemented

**Criterion:** SE 18B

**Criterion Title:** Determination of placement; provision of IEP to parent

**Rating:** Partially Implemented

**Criterion:** SE 39

**Criterion Title:** Procedures used to provide services to eligible students enrolled in private schools at private expense

**Rating:** Partially Implemented

**Criterion:** SE 44

**Criterion Title:** Procedure for recording suspensions

**Rating:** Partially Implemented

**Criterion:** SE 46

**Criterion Title:** Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district

**Rating:** Partially Implemented

**Criterion:** SE 47

**Criterion Title:** Procedural requirements applied to students not yet determined to be eligible for special education

**Rating:** Partially Implemented

**Integrated Monitoring Review**

**Special Education Corrective Action**

## SE 3 Corrective Action Plan

**Criterion & Topic:** SE 3 Special requirements for determination of specific learning disability

**Rating:** Partially Implemented

**Department Findings:**

A review of student records and staff interviews indicated that when a student suspected of having a specific learning disability is evaluated, the Team does not always create a written determination as to whether or not the student has a specific learning disability, which is signed by all members of the Team, or if there is disagreement as to the determination, one or more Team members document their disagreement.

**Description of Corrective Action:**

Due to challenges around consistency with the structure and agenda of meetings, the Team did not consistently utilize a form where a written determination for a specific disability was used. This was often "overlooked" at meetings or done verbally, and the written determination was not done in every meeting.

**Title/Role of Responsible Person:**

Director of Special Education and Social Emotional learning

**Expected Date of Completion:**

05/31/2026

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

* Procedures to ensure the written determination is completed
* Evidence of staff training, including training materials (e.g., agendas, presentation slides, handouts), verification forms indicating staff participation, and acknowledgment of content understanding

Internal monitoring of procedures to ensure the written determination is completed

**Description of Internal Monitoring Procedures:**

The Office of Special Education and Social Emotional Learning, every quarter, will conduct a sampling of student files for those students identified with a specific learning disability that underwent an initial or re-evaluation to verify that the written determination was completed. For any noncompliance identified, coaching or additional training, as required.

## Department Approval Section

**Criterion:** SE 3 Special requirements for determination of specific learning disability

**Corrective Action Plan Status:** Approved

**Status Date:** 09/02/202

**Correction Status:** Not Corrected

**Required Elements of Progress Reports:**

By October 24, 2025, the district will submit updated procedures that address requirements for determination of specific learning disability.

By January 9, 2026, the district will submit training materials, agenda (s), and verification of attendance to demonstrate that relevant staff are trained on the district's updated procedures.

By March 20, 2026, staff from the Office of Public School Monitoring (PSM) will conduct a review of student records for evidence that when a student is suspected of having a specific learning disability the Team creates a written determination, which is signed by all members of the Team, or if there is disagreement as to the determination, one or more Team members document their disagreement.

For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective actions. Upon completion of any such corrective actions, PSM staff will conduct an additional review of student records

**Progress Report Due Dates:**

10/24/2025

01/09/2026

03/20/2026

**Integrated Monitoring Review**

**Special Education Corrective Action**

**SE 7 Corrective Action Plan**

**Criterion & Topic:** SE 7 Transfer of parental rights at age of majority and student participation and consent at the age of majority

**Rating:** Partially Implemented

**Department Findings:**

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, the district does not always obtain consent from the student with shared decision-making authority to continue their special education program.

**Description of Corrective Action:**

The district conducted a root cause analysis which indicated that insufficient training or lack of awareness among staff; the lack of an effective system to track students approaching or having reached the age of majority; and failure to document consent in the student record led to the noncompliance.

**Title/Role of Responsible Person:**

Director of Special Education and Social Emotional learning

**Expected Date of Completion:**

05/31/2026

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

* Procedures to ensure timely and compliant transfer of parental rights at the age of majority;
* Evidence of staff training at Westford Academy, including training materials (e.g., agendas, presentation slides, handouts), verification forms indicating staff participation, and acknowledgment of content understanding; and

A formal compliance tracking report for Westford Academy, outlining the status of each student's transfer of parental rights at the age of majority.

**Description of Internal Monitoring Procedures:**

The Office of Special Education and Social Emotional Learning, every quarter, will conduct a sampling of Westford Academy student files to verify timely and compliant transfer of parental rights at the age of majority. For any noncompliance identified, coaching or additional training, as required.

## Department 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:** 09/02/2025

**Correction Status:** Not Corrected

**Required Elements of Progress Reports:**

By October 24, 2025, the district will submit updated procedures that address transfer of parental rights at age of majority and student participation and consent at the age of majority.

By January 9, 2026, the district will submit training materials, agenda (s) and verification of attendance to demonstrate relevant staff are trained on the updated procedures.

By March 20, 2026, staff from the Office of Public School Monitoring (PSM) will conduct a review of student records for evidence that 1) 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; and 2) the district obtains consent from the student with shared decision-making authority to continue their special education program.

For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective actions. Upon completion of any such corrective actions, PSM staff will conduct an additional review of student records.

**Progress Report Due Dates:**

10/24/2025

01/09/2026

03/20/2026

**Integrated Monitoring Review**

**Special Education Corrective Action**

**SE 9 Corrective Action Plan**

**Criterion & Topic:** SE 9 Timeline for determination of eligibility

**Rating:** Partially Implemented

**Department Findings:**

A review of student records and staff interviews indicated that within 45 school working days after receipt of the parent's written consent to an initial evaluation or re-evaluation, the district does not always determine whether the student is eligible for special education and provide the parent with a proposed IEP and proposed placement.

**Description of Corrective Action:**

Due to several contributing factors, including staffing shortages, onboarding of new personnel, and an overall increase in student numbers, the district was found to be out of compliance with certain requirements related to the 30 and 45-day timelines. Further, there was a long-standing misunderstanding of the timelines. Specifically, staff thought they were allowed 10 days past the 45 days to write and present the Individualized Education Plan (IEP). This was clarified by the recent DESE Policy Memo: Special Education Policy Memo SY 2024-2025 6 Implementation of 603 CMR 28.05(7): Parent response to proposed IEP and proposed placement

**Title/Role of Responsible Person:**

Director of Special Education and Social Emotional learning

**Expected Date of Completion:**

05/31/2026

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

* A copy of the IEP Team Meeting Checklist, along with procedures to ensure a compliant IEP process;
* Evidence of staff training, including training materials (e.g., agendas, presentation slides, handouts), verification forms indicating staff participation, and acknowledgment of content understanding; and
* A compliance tracking report for each school site, outlining the status of IEP implementation and adherence to timelines.

**Description of Internal Monitoring Procedures:**

The Office of Special Education and Social Emotional Learning, every quarter, will conduct a sampling of student files to verify that Individualized Education Programs (IEPs) are provided to caregivers within 45 days of receiving signed caregiver consent. For any noncompliance identified, coaching or additional training, as required.

## Department Approval Section

**Criterion:** SE 9 Timeline for determination of eligibility

**Corrective Action Plan Status:** Approved

**Status Date:** 09/02/2025

**Correction Status:** Not Corrected

**Required Elements of Progress Reports:**

By October 24, 2025, the district will reconvene the Individualized Education Program (IEP) Teams for the three students identified by staff from the Office of Public School Monitoring (PSM). Evidence will include Evidence will include the IEP Meeting Invitation, Attendance Sheet, revised IEP, and Notice of Proposed School District Action (N1). Evidence will also include a summary of the discussion regarding compensatory services, along with the Team's decision. If compensatory services are determined necessary by the Team, the district will provide a description of such services, the amount provided, and the internal tracking or scheduling system developed to ensure services are delivered.

By October 24, 2025, the district will submit procedures that address the timeline for determining eligibility. The updated procedures will include a description of how compensatory services are considered by the Team whenever there is a noncompliant delay in IEP implementation.

By January 9, 2026, the district will submit training materials, agenda (s), and verification of attendance to demonstrate that relevant staff are trained on the district's updated procedures.

By March 20, 2026, staff from PSM will conduct a review of student records for evidence that within 45 school working days after receipt of the parent's written consent to an initial evaluation or re-evaluation, the district determines whether the student is eligible for special education and provides the parent with a proposed IEP and proposed placement.

For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective actions. Upon completion of any such corrective actions, PSM staff will conduct an additional review of student records.

**Progress Report Due Dates:**

10/24/2025

01/09/2026

03/20/2026

**Integrated Monitoring Review**

**Special Education Corrective Action**

**SE 18B Corrective Action Plan**

**Criterion & Topic:** SE 18B Determination of placement; provision of IEP to parent

**Rating:** Partially Implemented

**Department Findings:**

A review of student records and staff interviews indicated that the district does not consistently issue the proposed IEP and proposed placement to the parent immediately following the development of the IEP.

**Description of Corrective Action:**

Due to several contributing factors, including staffing shortages, onboarding of new personnel, and an overall increase in student numbers, the district was found to be out of compliance with certain requirements related to the 30 and 45-day timelines. Further, there was a long-standing misunderstanding of the timelines. Specifically, staff thought they were allowed 10 days past the 45 days to write and present the IEP. This was clarified by the recent DESE Policy Memo.

**Title/Role of Responsible Person:**

Director of Special Education and Social Emotional learning

**Expected Date of Completion:**

05/31/2026

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

* A copy of the IEP Team Meeting Checklist, along with procedures to ensure a compliant IEP process;
* Evidence of staff training, including training materials (e.g., agendas, presentation slides, handouts), signed attendance sheets or verification forms indicating staff participation, and acknowledgment of content understanding; and

A compliance tracking report for each school site, outlining the status of IEP implementation and adherence to timelines.

**Description of Internal Monitoring Procedures:**

The Office of Special Education and Social Emotional Learning, every quarter, will conduct a random sampling of student files to verify that Individualized Education Plans (IEPs) are proposed to caregivers no later than five (5) school days following the IEP Team Meeting. For any noncompliance identified, coaching or additional training, as required.

## Department Approval Section

**Criterion:** SE 18B Determination of placement; provision of IEP to parent

**Corrective Action Plan Status:** Approved

**Status Date:** 09/02/2025

**Correction Status:** Not Corrected

**Required Elements of Progress Reports:**

By October 24, 2025, the district will submit updated procedures that address immediate provision of the IEP to the parent. The updated procedures will include a description of how compensatory services are considered by the Team whenever there is a noncompliant delay in IEP implementation.

By January 9, 2026, the district will submit training materials, agenda (s), and verification of attendance to demonstrate that relevant staff are trained on the district's updated procedures.

By March 20, 2026, staff from the Office of Public School Monitoring (PSM) will conduct a review of student records for evidence that the proposed IEP and proposed placement is provided to the parent immediately following the development of the IEP.

For any identified non-compliance, the district will submit a root cause analysis and a description of appropriate corrective actions. Upon completion of any such corrective actions, PSM staff will conduct an additional review of student records.

**Progress Report Due Dates:**

10/24/2025

01/09/2026

03/20/2026

**Integrated Monitoring Review**

**Special Education Corrective Action**

**SE 39 Corrective Action Plan**

**Criterion & Topic:** SE 39 Procedures used to provide services to eligible students enrolled in private schools at private expense

**Rating:** Partially Implemented

**Department Findings:**

A review of documents and staff interviews indicated that the district has not developed procedures regarding the provision of services to eligible students enrolled in private schools at private expense.

**Description of Corrective Action:**

While the district does work and currently provides services to eligible students who are currently home-schooled, as there are no private schools within Westford boundaries, the procedures are not whole and clearly defined, nor are they regularly monitored.

**Title/Role of Responsible Person:**

Director of Special Education and Social Emotional learning

**Expected Date of Completion:**

05/31/2026

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

Evidence of a committee convening to create and review equitable services policy, procedure, and implementation; and

Procedures for equitable services that are clearly advertised and laid out on the district website and in the Student Support Handbook

**Description of Internal Monitoring Procedures:**

The Office of Special Education and Social Emotional Learning will conduct a tri-annual review of homeschooled students with disabilities and their services.

## Department Approval Section

**Criterion:** SE 39 Procedures used to provide services to eligible students enrolled in private schools at private expense

**Corrective Action Plan Status:** Partially Approve

**Status Date:** 09/02/2025

**Correction Status:** Not Corrected

**Basis for Decision:**

The district's description of internal monitoring does not address how the updated procedures regarding the provision of services to eligible students enrolled in private schools at private expense will be regularly monitored for required content to ensure sustaining compliance.

**Department Order of Corrective Action:**

The district will submit internal monitoring procedures that address regular monitoring of the newly developed provision of services to eligible students enrolled in private schools at private expense procedures.

**Required Elements of Progress Report:**

By October 24, 2025, the district will submit newly developed procedures that address the provision of services to eligible students enrolled in private schools at private expense, inclusive of home-school students as well as its internal monitoring procedures that address regular monitoring for required content.

**Progress Report Due Date:**

10/24/2025

**Integrated Monitoring Review**

**Special Education Corrective Action**

**SE 44 Corrective Action Plan**

**Criterion & Topic:** SE 44 Procedure for recording suspensions

**Rating:** Partially Implemented

**Department Findings:**

A review of documents indicated that the district has not developed a procedure to record the number and duration of suspensions from any part of the student's program, including suspensions from special transportation prescribed by the IEP.

**Description of Corrective Action:**

While the district is recording suspensions for students with disabilities, the procedure is not consistent, and staffing changes have brought on the administrative teams who are less familiar with suspension.

**Title/Role of Responsible Person:**

Director of Special Education and Social Emotional Learning

**Expected Date of Completion:**

05/31/2026

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

* Procedures to ensure suspension from any part of a student with disabilities day are recorded in the district's information system (PowerSchool);
* Training building-based administrators on the procedures; and

Internal monitoring of the procedures to ensure suspension is recorded.

**Description of Internal Monitoring Procedures:**

The Office of Special Education and Social Emotional Learning, every month, will review PowerSchool data and cross-reference that with school data to ensure that all suspensions are recorded within PowerSchool.

## Department Approval Section

**Criterion:** SE 44 Procedure for recording suspensions

**Corrective Action Plan Status:** Approved

**Status Date:** 09/02/2025

**Correction Status:** Not Corrected

**Required Elements of Progress Reports:**

By October 24, 2025, the district will submit newly developed procedures that address recording suspensions, including suspensions from special transportation prescribed by the IEP.

By January 9, 2026, the district will submit training materials, agenda (s), and verification of attendance to demonstrate relevant staff are trained on the procedures

**Progress Report Due Dates:**

10/24/2025

01/09/2026

**Integrated Monitoring Review**

**Special Education Corrective Action**

**SE 46 Corrective Action Plan**

**Criterion & Topic:** SE 46 Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district

**Rating:** Partially Implemented

**Department Findings:**

A review of documents indicated that the district's procedures for the discipline of students with disabilities do not include the provision of the written notice of procedural safeguards to parents no later than the date of the decision to take disciplinary action.

**Description of Corrective Action:**

While the district is providing the written notice of procedural safeguards to some parents, this procedure is not consistent across the district. Additionally, staffing changes have brought on the administrative teams who are less familiar with the process of suspension.

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

Director of Special Education and Social Emotional learning

**Expected Date of Completion:**

05/31/2026

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

* Procedures to ensure the provision of the written notice of procedural safeguards to parents no later than the date of the decision to take disciplinary action;
* Training building-based administrators on the procedures; and

Internal monitoring of the procedures for the dissemination of procedural safeguards.

**Description of Internal Monitoring Procedures:**

When a suspension occurs, the Director of Special Education and Social Emotional Learning and building-based special education administrators will be notified.

The Office of Special Education and Social Emotional Learning, twice a year, will review student files with 10 or more days of suspension for evidence that procedural safeguards were provided to parents no later than the date of the decision to take disciplinary action.

## Department Approval Section

**Criterion:** SE 46 Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district

**Corrective Action Plan Status:** Approved

**Status Date:** 09/02/2025

**Correction Status:** Not Corrected

**Required Elements of Progress Reports:**

By October 24, 2025, the district will submit updated procedures for the discipline of students with disabilities to include the provision of the written notice of procedural safeguards to parents no later than the date of the decision to take disciplinary action.

By January 9, 2026, the district will submit training materials, agenda (s), and verification of attendance to demonstrate that relevant staff are trained on the district's updated procedures.

**Progress Report Due Dates:**

10/24/2025

01/09/2026

**Integrated Monitoring Review**

**Special Education Corrective Action**

**SE 47 Corrective Action Plan**

**Criterion & Topic:** SE 47 Procedural requirements applied to students not yet determined to be eligible for special education

**Rating:** Partially Implemented

**Department Findings:**

A review of documents indicated that the district has not developed procedures for the discipline of students who are not yet determined to be eligible for special education.

**Description of Corrective Action:**

While the district does provide support for students not yet to be determined for special education involving discipline, there is no consistent, documented procedure for this in all schools throughout the district.

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

Director of Special Education and Social Emotional learning

**Expected Date of Completion:**

05/31/2026

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

* Procedures for the discipline of students who are not yet determined to be eligible for special education;
* Including procedures in student handbooks, the district’s special education manual, and on the school’s website;
* Training building-based administrators on the procedures; and

Internal monitoring of the procedures for the discipline of students who are not yet determined to be eligible for special education.

**Description of Internal Monitoring Procedures:**

The Office of Special Education and Social Emotional Learning, twice a year, will review student files for the discipline of students who are not yet determined to be eligible for special education to ensure procedures were followed.

## Department Approval Section

**Criterion:** SE 47 Procedural requirements applied to students not yet determined to be eligible for special education

**Corrective Action Plan Status:** Approved

**Status Date:** 09/02/2025

**Correction Status:** Not Corrected

**Required Elements of Progress Reports:**

By October 24, 2025, the district will submit newly developed procedures for the discipline of students who are not yet determined to be eligible for special education.

By January 9, 2026, the district will submit training materials, agenda (s), and verification of attendance to demonstrate that relevant staff are trained on the district's updated procedures.

**Progress Report Due Dates:**

10/24/2025

01/09/2026