**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

Public School Monitoring

Integrated Monitoring Review

# Corrective Action Plan

Local Education Agency: Hilltown Cooperative Charter Public School

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 Integrated Monitoring Review Report dated 06/28/2025.

**Mandatory One-Year Compliance Date:** **6/27/2026**

## Summary of Required Corrective Action Plans

**Criterion:** CR 10A

**Criterion Title:** Student handbooks and codes of conduct

**Rating:** Partially Implemented

**Criterion:** CR 17A

**Criterion Title:** Use of physical restraint on any student enrolled in a publicly-funded education program

**Rating:** Partially Implemented

**Integrated Monitoring Review**

**Civil Rights Corrective Action**

**CR 10A Local Education Agency Response**

**Criterion & Topic:** CR 10A Student handbooks and codes of conduct

**Rating:** Partially Implemented

**Department Findings:**

Document review and staff interviews indicated that the following procedures were recently updated to include all requirements and approved by the Board of Trustees:

* Due process regarding the discipline of students with disabilities; and
* Superintendent's hearing to appeal the principal's decision to impose a long-term suspension.

However, these updates have not yet been added to the code of conduct and disseminated to the school community.

**Description of Corrective Action:**

While Hilltown administration revised our Due Process policy and procedures during the pre-finding stage of the recently completed PSM Integrated Monitoring Review, we were not able to incorporate the revised policy into our Family Handbook and have it approved by the HCCPS Board of Trustees in time for the onsite visit.

The root cause of this noncompliance was the timing of the policy update in relation to our annual handbook revision and approval process. Although the revised policy was completed in good faith and aligned with state requirements, it was finalized too late to be included in the handbook version presented to the Board prior to the review. Additionally, our handbook update process lacked a clear mechanism for rapid revision and mid-year dissemination, limiting our ability to reflect policy changes on a shorter timeline.

To address this, Hilltown will:

* Present a newly revised Family Handbook to the Board, including the updated Due Process policy, at the August 13th, 2025 meeting;
* Integrate the new policy into mandatory staff training to be delivered prior to the start of the school year in late August; and

Disseminate the updated Family Handbook electronically and post it to www.hilltowncharter.org prior to the start of the 2025-26 school year.

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

Head of School, Director of Teaching and Learning

**Expected Date of Completion:**

09/30/2025

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

The revised Due Process policy will be incorporated into our Family Handbook, and we anticipate approval of the revised handbook by the Board of Trustees at our meeting on August 13th.

All training related to due process will be updated to include the revisions. Evidence will include training materials and verification of attendance.

**Description of Internal Monitoring Procedures:**

The Family Handbook is reviewed and revised each year to ensure compliance with any new updates to procedure and policy.

## Department Approval Section

**Criterion:** CR 10A Student handbooks and codes of conduct

**Corrective Action Plan Status:** Approved

**Status Date:** 08/07/2025

**Correction Status:** Not Corrected

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

By August 29, 2025, the school will submit evidence that the Board of Trustees approved 2025-2026 Family Handbook that includes all required student discipline procedures including due process procedures for the discipline of students with disabilities. Evidence will include meeting minutes.

By September 30, 2025, staff from the Office of Public School Monitoring will verify dissemination of the 2025-2026 Family Handbook to the school community on the district's website. Additionally, the school will submit evidence of staff training on the revised procedures. Evidence will include training materials or agenda and verification of staff attendance.

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

08/29/2025

09/30/2025

**Integrated Monitoring Review**

**Civil Rights Corrective Action**

**CR 17A Local Education Agency Response**

**Criterion & Topic:** CR 17A Use of physical restraint on any student enrolled in a publicly-funded education program

**Rating:** Partially Implemented

**Department Findings:**

Document review and staff interviews indicated that the school's restraint prevention and behavior support policy and procedures are inconsistent with regulations under 603 CMR 46.00 and do not include the following requirements:

* A statement indicating that prone restraint shall be prohibited except on an individual student basis and only under the circumstances of 603 CMR 46.03(1)(b)(1-6); and
* Training content requirements for all staff.

Additionally, the school's restraint prevention and behavior support training does not include the following requirements:

* The role of the student and family in preventing restraint;
* Information regarding the increased risk of injury to a student when any restraint is used; and
* Administering physical restraint in accordance with medical or psychological limitations, known or suspected trauma history, and/or behavior intervention plans applicable to an individual student.

Furthermore, the school's training materials contain erroneous information regarding reporting requirements.

**Description of Corrective Action:**

Hilltown updated its physical restraint policy in preparation for the Integrated Monitoring Review; however, the accompanying procedures and training materials were not revised in full alignment with the requirements of 603 CMR 46.00. Specifically, our written procedures did not yet include language prohibiting prone restraint except under limited regulatory exceptions, and our annual staff training did not include several key content areas, including the role of students and families in prevention, trauma-informed considerations, and accurate reporting requirements.

The root cause of this noncompliance is closely tied to the school's transition during the 2024-2025 school year, which included significant leadership restructuring and the onboarding of two new administrators. While the administrative team worked diligently and in good faith to respond to the IMR process, the absence of a centralized system for policy management created obstacles in ensuring that policy updates, training content, and internal documentation remained aligned. In this context, gaps emerged between the revised policy and supporting procedures and training materials.

To address this, Hilltown will:

* Revise and clarify our physical restraint procedures to align fully with 603 CMR 46.00, including required language on prone restraint and other procedural expectations;
* Update our staff training materials to ensure all required content is included and that reporting guidance is accurate and aligned with current regulations;
* Deliver the revised training to all staff as part of our mandatory August 2025 professional development; and

Establish a coordinated annual review process led by the Head of School and Director of Teaching and Learning to maintain alignment across policy, procedure, and training content.

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

Head of School, Director of Teaching and Learning

**Expected Date of Completion:**

09/30/2025

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

Revised restraint prevention and behavior support procedures, updated to reflect full compliance with 603 CMR 46.00, including:

* A clear statement prohibiting prone restraint except as allowed under 603 CMR 46.03(1)(b)(1-6);
* Accurate and current reporting protocols;
* Updated staff training materials, including slides focusing on:

- The role of students and families in preventing restraint

- The increased risk of injury associated with any use of restraint

- Administering restraint in consideration of medical or psychological limitations, known or suspected trauma history, and individual behavior intervention plans

- Accurate reporting timelines and procedures;

- Training agenda and attendance documentation from August 2025 staff training (e.g.) participation logs for asynchronous modules); and

- Links to updated policy and procedures posted on the Hilltown Charter website and shared with staff through email.

**Description of Internal Monitoring Procedures:**

Each spring, the Head of School and Director of Teaching and Learning will review restraint policies, procedures, and training materials to ensure alignment with 603 CMR 46.00.

Updated training will be delivered to all staff during August PD, with attendance tracked. New hires will receive the same training during onboarding.

The Head of School will review all restraint incident reports to ensure timely reporting and alignment with policy, including documentation of trauma-informed practices and individual student needs.

## Department Approval Section

**Criterion:** CR 17A Use of physical restraint on any student enrolled in a publicly-funded education program

**Corrective Action Plan Status:** Approved

**Status Date:** 08/07/2025

**Correction Status:** Not Corrected

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

Upon receiving the Integrated Monitoring Review Report, the school revised the restraint prevention and behavior support procedures, which now contain all required elements.

By August 29, 2025, the school will submit evidence that the revised restraint prevention and behavior support procedures were made available to the school community.

By September 30, 2025, the school will submit evidence that all staff have received the required training. Evidence will include training materials and evidence of staff attendance.

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

08/29/2025

09/30/2025