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

##### INTEGRATED MONITORING REVIEW

## CORRECTIVE ACTION PLAN

Charter School or District: Sturgis Charter Public School

Monitoring Onsite Year: 2024-2025

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 Special Education and Civil Rights Monitoring Report dated 01/15/2025.

**Mandatory One-Year Compliance Date:** **01/15/2026**

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

| **Criterion** | **Criterion Title** | **Rating** |
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| CR 10A | Student handbooks and codes of conduct | Partially Implemented |
| CR 10B | Bullying Intervention and Prevention | Partially Implemented |
| CR 16 | Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | Partially Implemented |
| CR 17A | Use of physical restraint on any student enrolled in a publicly-funded education program | Partially Implemented |
| CR 24 | Curriculum review | Partially Implemented |

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| SPECIAL EDUCATION AND CIVIL RIGHTSMONITORING REVIEW**CORRECTIVE ACTION PLAN** |

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| **Criterion & Topic:** CR 10A Student handbooks and codes of conduct | **Rating:** Partially Implemented |
| **Department Findings:** A review of documents and staff interviews indicated that the student handbook does not include school-wide models to re-engage students in the learning process. Additionally, the procedures for discipline of students with disabilities are incomplete and do not include the following required information:A suspension of longer than 10 consecutive days or a series of suspensions that are shorter than 10 consecutive days but constitute a pattern are considered to represent a change in placement.When a suspension constitutes a change in placement of a student with disabilities, school personnel, the parent, and other relevant members of the Team, as determined by the parent and the school, convene within 10 days of the decision to suspend to review all relevant information in the student's file, including the IEP, any teacher observations, and any relevant information from the parents, to determine whether the behavior was caused by or had a direct and substantial relationship to the disability or was the direct result of the school's failure to implement the IEP "a manifestation determination." If school personnel, the parent, and other relevant members of the Team determine that the behavior is NOT a manifestation of the disability, then the suspension or expulsion may go forward consistent with policies applied to any student without disabilities, except that the school must still offer: * services to enable the student, although in another setting, to continue to participate in the general education curriculum and to progress toward IEP goals; and
* as appropriate, a functional behavioral assessment and behavioral intervention services and modifications, to address the behavior so that it does not recur.

If school personnel, the parent, and other relevant members of the Team determine that the behavior IS a manifestation of the disability, then the Team completes a functional behavioral assessment and behavioral intervention plan if it has not already done so. If a behavioral intervention plan is already in place, the Team reviews and modifies it, as necessary, to address the behavior. Except when he or she has been placed in an interim alternative educational setting, the student returns to the original placement unless the parents and school agree otherwise, or the hearing officer orders a new placement.Not later than the date of the decision to take disciplinary action, the school notifies the parents of that decision and provides them with the written notice of procedural safeguards.If the parent chooses to appeal or the school requests a hearing because it believes that maintaining the student's current placement is substantially likely to result in injury to the student or others, the student remains in the disciplinary placement, if any, until the decision of the hearing officer or the end of the time period for the disciplinary action, whichever comes first, unless the parent and the school agree otherwise. |
| **Description of Corrective Action:** The charter school will conduct a root cause analysis for the noncompliance and update the student handbook to include school-wide models to re-engage students in the learning process and all the required discipline procedures for students with disabilities. |
| **Title/Role(s) of Responsible Persons:**Principals | **Expected Date of Completion:**09/05/2025 |
| **Evidence of Completion of the Corrective Action:**The charter school will submit a root cause analysis, a revised student handbook that meets all requirements, and evidence that the handbook has been approved by charter school leadership and disseminated to staff, students, and families.  |
| **Description of Internal Monitoring Procedures:** The charter school will ensure that the student handbook is reviewed annually and updated as necessary to ensure consistency with the regulations. Additionally, the updated student handbook will be disseminated to members of the school community.  |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10A Student handbooks and codes of conduct | **Corrective Action Plan Status:** Approved **Status Date:** 02/05/2025 **Correction Status:** Not Corrected |
| **Required Elements of Progress Report(s):** By April 11, 2025, the charter school will submit a summary of the root cause analysis and a revised student handbook that meets all requirements, including school-wide models to re-engage students in the learning process and all the required discipline procedures for students with disabilities. By July 18, 2025, the charter school will submit evidence that the revised student handbook has been approved by the school leadership. By September 5, 2025, the charter school will submit evidence that the revised student handbook has been disseminated to staff, students, and families.  |
| **Progress Report Due Date(s):** 04/11/202507/18/202509/05/2025 |

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| **Criterion & Topic:** CR 10B Bullying Intervention and Prevention | **Rating:** Partially Implemented |
| **Department Findings:** A review of documents and staff interviews indicated that although the school's Bullying Prevention and Intervention Plan (Plan) recognizes that certain students may be more vulnerable to bullying or harassment based on actual or perceived characteristics, the Plan does not address all required characteristics including race; religion; ancestry; national origin; sex; socioeconomic status; academic status; physical appearance; pregnant or parenting status; mental, physical, or developmental disability; or by association with a person who has or is perceived to have one or more of these characteristics.Additionally, the Plan is missing the following required components: * Specific steps the charter school will take to support vulnerable students;
* A statement assuring protection for all students regardless of legal status;
* Administration of a student survey every four years to assess school climate and the prevalence, nature, and severity of bullying in schools; and
* Information for parents or guardians about the Department's problem resolution system process for seeking assistance or filing a claim.
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| **Description of Corrective Action:** The charter school will update the bullying prevention and intervention plan to include all the required elements. |
| **Title/Role(s) of Responsible Persons:**Executive Director, Principals | **Expected Date of Completion:**07/18/2025 |
| **Evidence of Completion of the Corrective Action:**The charter school will submit the revised bullying prevention and intervention plan, evidence of approval, and evidence of dissemination to staff, students, and families. |
| **Description of Internal Monitoring Procedures:** The Executive Director will annually review the charter school's bullying prevention and intervention plan to ensure it addresses all the required components. The plan shall be updated at least biennially in accordance with M.G.L.c.71, s.37O. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 10B Bullying Intervention and Prevention | **Corrective Action Plan Status:** Approved **Status Date:** 02/05/2025 **Correction Status:** Not Corrected |
| **Required Elements of Progress Report(s):** By April 11, 2025, the charter school will submit a revised bullying prevention and intervention plan that meets all requirements, including: * Recognizing that certain students may be more vulnerable to bullying or harassment based on actual or perceived characteristics, including race, color, religion, ancestry, national origin, sex, socioeconomic status, homelessness, academic status, gender identity or expression, physical appearance, pregnant or parenting status, sexual orientation, mental, physical, developmental or sensory disability or by association with a person who has or is perceived to have one or more of these characteristics;
* Specific steps the charter school will take to support vulnerable students;
* A statement assuring protection for all students regardless of legal status;
* Administration of a student survey every four years to assess school climate and the prevalence, nature, and severity of bullying in schools; and
* Information for parents or guardians about the Department's problem resolution system process for seeking assistance or filing a claim.

By July 18, 2025, the charter school will submit evidence that the revised bullying prevention and intervention plan has been approved and disseminated to staff, students, and families. |
| **Progress Report Due Date(s):** 04/11/202507/18/2025 |

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| **Criterion & Topic:** CR 16 Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | **Rating:** Partially Implemented |
| **Department Findings:** A review of documents and staff interviews indicated that the notice sent to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion does not meet all requirements. Specifically, the notice is sent after 15 consecutive absences instead of 10, as required, and inaccurately states that unless documented explanations are furnished for the absences, the student will be dropped from the charter school roster 10 days from the date of the letter. Furthermore, the notice does not indicate that the time and date of the exit interview may be extended at the request of the parent/guardian from 10 days from the notice date to no longer than 14 days. Additionally, the charter school does not send annual written notice to former students from the previous two years who have not yet earned their Competency Determination to inform them of available academic support options. |
| **Description of Corrective Action:** The charter school will conduct a root cause analysis and implement an action plan to ensure that all requirements are met when students 16 or over leave school or consider leaving school. The charter school will also review all relevant procedures, practices, and notice templates and revise as necessary to ensure they meet requirements, including sending notice to students within five days of the student’s tenth consecutive absence and indicating that the time and date of the exit interview may be extended at the request of the parent/guardian from 10 days from the notice date to no longer than 14 days. The procedures will also ensure the annual written notice is sent to former students who attended the high school within the past two years, have not yet earned their competency determination, and have not transferred to another school, to inform them of the available academic support options. |
| **Title/Role(s) of Responsible Persons:**Executive Director, Principals | **Expected Date of Completion:**09/05/2025 |
| **Evidence of Completion of the Corrective Action:**The charter school will submit a root cause analysis, any revised procedures and notice templates, evidence of implementing internal monitoring, and evidence of staff training. |
| **Description of Internal Monitoring Procedures:** Annually, the charter school will train all relevant staff on the requirements for notice to students over 16 leaving school, charter school procedures to ensure the requirements are met, any updated notices, and the charter school internal monitoring system. At least quarterly, Principals will review the internal tracking system to ensure the required procedures are implemented. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 16 Notice to students 16 or over leaving school without a high school diploma, certificate of attainment, or certificate of completion | **Corrective Action Plan Status:** Approved **Status Date:** 02/05/2025 **Correction Status:** Not Corrected |
| **Required Elements of Progress Report(s):** By April 11, 2025, the charter school will submit a root cause analysis, any revised procedures and notice templates, and a description of the charter school’s internal monitoring system. The revised procedures will ensure that notice is sent within 5 days of a student’s tenth consecutive absence and that the notice indicates that the time and date of the exit interview may be extended at the request of the parent/guardian from 10 days from the notice date to no longer than 14 days. The charter school will ensure that the revised notice eliminates barriers to student enrollment, such as the requirement that documented explanations be furnished for absences. Additionally, the charter school will submit notice templates for students who attended the high school within the past two years, have not yet earned their competency determination, and have not transferred to another school to inform them of academic support options. By July 18, 2025, the charter school will submit evidence that all relevant staff have been trained on the requirements, procedures, notices, and internal monitoring system. By September 5, 2025, the charter school will submit evidence of implementation of the internal monitoring system to ensure the required procedures are implemented. For any identified noncompliance, the district will conduct a root cause analysis and implement appropriate corrective actions.  |
| **Progress Report Due Date(s):** 04/11/202507/18/202509/05/2025 |

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| **Criterion & Topic:** CR 17A Use of physical restraint on any student enrolled in a publicly-funded education program | **Rating:** Partially Implemented |
| **Department Findings:** A review of documents and staff interviews indicated that although the charter school updated the restraint policy and restraint procedures to meet all requirements, there is no evidence that the updated policy and procedures have been disseminated to the school community. The student handbook includes an out-of-date restraint policy that is missing required information on prohibited restraints. Additionally, the restraint training provided to all staff does not address the following requirements:* The role of the student, family, and staff in preventing restraint;
* The school's restraint prevention and behavior support policy and procedures;
* Interventions that may preclude the need for restraint, including de-escalation of problematic behaviors and other alternatives to restraint in emergency circumstances;
* When behavior presents an emergency that requires physical restraint, the types of permitted physical restraints and related safety considerations, including information regarding the increased risk of injury to a student when any restraint is used, in particular a restraint of extended duration; and
* Administering physical restraint in accordance with medical or psychological limitations, known or suspected trauma history, and/or behavioral intervention plans applicable to an individual student.
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| **Description of Corrective Action:** The charter school will disseminate the revised procedures related to use of physical restraint to the school community. The charter school will also update the student handbook to ensure the information contained is consistent with the current physical restraint regulations and disseminate the updated handbook to the school community. The charter school will also revise restraint training materials to address all requirements and provide evidence of training all staff on the revised materials.  |
| **Title/Role(s) of Responsible Persons:**Executive Director, Principals | **Expected Date of Completion:**09/05/2025 |
| **Evidence of Completion of the Corrective Action:**Revised training materials that meet all requirements and evidence of staff training. Revised student handbook and evidence of dissemination of the revised handbook and the updated restraint prevention policy and procedures. |
| **Description of Internal Monitoring Procedures:** The Executive Director will review the restraint and behavior support policy, procedures, and training materials annually to ensure alignment with the current regulations prior to the start of the school year.   |
| CORRECTIVE ACTION PLAN 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:** 02/05/2025 **Correction Status:** Not Corrected |
| **Required Elements of Progress Report(s):** By April 11, 2025, the charter school will submit an updated student handbook and revised restraint training materials that address: * The role of the student, family, and staff in preventing restraint;
* The school's restraint prevention and behavior support policy and procedures;
* Interventions that may preclude the need for restraint, including de-escalation of problematic behaviors and other alternatives to restraint in emergency circumstances;
* When behavior presents an emergency that requires physical restraint, the types of permitted physical restraints and related safety considerations, including information regarding the increased risk of injury to a student when any restraint is used, in particular a restraint of extended duration; and
* Administering physical restraint in accordance with medical or psychological limitations, known or suspected trauma history, and/or behavioral intervention plans applicable to an individual student.

By September 5, 2025, the charter school will submit evidence that the updated restraint policy and procedures have been disseminated to staff, students, and families; and that all staff have been trained on the physical restraint requirements and charter school procedures, including all required elements. The charter school will also submit evidence that the revised student handbook has been disseminated to staff, students, and families. |
| **Progress Report Due Date(s):** 04/11/202509/05/2025 |

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| **Criterion & Topic:** CR 24 Curriculum review | **Rating:** Partially Implemented |
| **Department Findings:** A review of documents and staff interviews indicated that the charter school does not ensure that all individual teachers review all educational and instructional materials for simplistic and demeaning generalizations on the basis of race, color, sex, gender identity, religion, national origin, and sexual orientation. Furthermore, the charter school does not ensure that teachers use appropriate activities, discussions, and/or supplementary materials to provide balance and context for such stereotypes that may be depicted in such materials. |
| **Description of Corrective Action:** The charter school will conduct a root cause analysis of the noncompliance and develop, tools, protocols, and procedures to ensure that individual teachers review all educational materials for bias and use appropriate activities, discussions, and/or supplementary materials to provide balance and context for any stereotypes depicted in such learning materials. The school will also provide teachers with training on the tools, protocols and procedures, and providing balance and context for stereotypes.  |
| **Title/Role(s) of Responsible Persons:**Executive Director, Principals | **Expected Date of Completion:**11/07/2025 |
| **Evidence of Completion of the Corrective Action:**A root cause analysis, revised curriculum review procedures, evidence of training all teachers on curriculum review protocols, and evidence of curriculum review implementation. |
| **Description of Internal Monitoring Procedures:** The charter school will conduct annual reviews of curriculum review implementation and conduct a teacher survey on curriculum review at least twice per year to ensure the curriculum review procedures are implemented consistently. |
| CORRECTIVE ACTION PLAN APPROVAL SECTION |
| **Criterion:** CR 24 Curriculum review | **Corrective Action Plan Status:** Approved **Status Date:** 02/05/2025 **Correction Status:** Not Corrected |
| **Required Elements of Progress Report(s):** By April 11, 2025, the charter school will submit a root cause analysis, revised curriculum review procedures, tools and protocols, and curriculum review training materials. By September 5, 2025, the charter school will submit evidence that all relevant staff have been trained on the curriculum review procedures; appropriate activities, discussions, and/or supplementary materials to provide balance and context for any stereotypes depicted in learning materials; and the internal monitoring system. By November 7, 2025, the charter school will submit evidence of implementation of the curriculum review procedures. The charter school will also submit a summary of the results of the review and any proposed actions secondary to the results.  |
| **Progress Report Due Date(s):** 04/11/202509/05/202511/07/2025 |