

**Plymouth Public Schools**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

**For** **Group B Universal Standards**

**Tier Level** **2**

**Dates of Onsite Visit:** **April 13-14, 2021**

**Date of Final Report:** **October 7, 2021**



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Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Plymouth Public Schools participated in a Tiered Focused Monitoring Review conducted by the Department’s Office of Public School Monitoring. The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

Districts/charter schools are reviewed every three years through Tiered Focused Monitoring. This review process emphasizes elements most tied to student outcomes and alternates the focus of each review on either Group A Universal Standards or Group B Universal Standards.

Group A Universal Standards address:

* Student identification
* IEP development
* Programming and support services
* Equal opportunity

Group B Universal Standards address:

* Licensure and professional development
* Parent/student/community engagement
* Facilities and classroom observations
* Oversight
* Time and learning
* Equal access

In addition, the Department has reserved a specific set of criteria, collectively known as Targeted Standards, employed when LEA or school-level risk assessment data indicate that there is a potential issue. Identified Targeted Standards are assessed in addition to the Universal Standards.

Universal Standards and Targeted Standards are aligned with the following regulations:

Special Education (SE)

* Selected requirements from the federal Individuals with Disabilities Education Act (IDEA-2004); the federal regulations promulgated under that Act at 34 CFR Part 300; M.G.L. c. 71B, and the Massachusetts Board of Education’s Special Education regulations (603 CMR 28.00), as amended effective March 1, 2007.

Civil Rights Methods of Administration and Other General Education Requirements (CR)

* Selected federal civil rights requirements, including requirements under Title VI of the Civil Rights Act of 1964; the Equal Educational Opportunities Act of 1974; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, together with selected state requirements under M.G.L. c. 76, Section 5 as amended by Chapter 199 of the Acts of 2011 and M.G.L. c. 269 §§ 17 through 19.
* Selected requirements from the Massachusetts Board of Education’s Physical Restraint regulations (603 CMR 46.00).
* Selected requirements from the Massachusetts Board of Education’s Student Learning Time regulations (603 CMR 27.00).
* Various requirements under other federal and state laws.

Tiered Focused Monitoring allows for differentiated monitoring based on a district/charter school’s level of need, the Tiers are defined as follows:

LEAs in Tiers 1 and 2 have been determined to have no or low risk:

* Tier 1/Self-Directed Improvement: Data points indicate no concern on compliance and performance outcomes – meets requirements.
* Tier 2/Directed Improvement: No demonstrated risk in areas with close link to student

outcomes – low risk.

LEAs in Tiers 3 and 4 have demonstrated greater risk:

* Tier 3/Corrective Action: Areas of concern include both compliance and student

outcomes – moderate risk.

* Tier 4/Cross-unit Support and Corrective Action: Areas of concern have profound effect on student outcomes and ongoing compliance – high risk.

The phases of Tiered Focused Monitoring for Plymouth Public Schools included:

Self-Assessment Phase:

* District reviewed special education and civil rights documentation for required elements including document uploads.
* District reviewed a sample of special education student records selected across grade levels, disability categories and levels of need.
* Upon completion of these two internal reviews, the district’s self-assessment was submitted to the Department for review.

On-site Verification Phase:

* Review of student records for special education: The Department selected a sample of student records from those the district reviewed as part of its self-assessment, as well as records chosen by the Department from the special education student roster. The onsite team conducted this review, using standard Department procedures, to determine whether procedural and programmatic requirements are being met.
* Review of additional documents for special education and civil rights.
* Surveys of parents of students with disabilities: Parents of students with disabilities were sent a survey to solicit information regarding their experiences with the district’s implementation of special education programs, related services, and procedural requirements.
* Interviews of staff consistent with those criteria selected for onsite verification.
* Interview of a parent advisory council (PAC) representative and other telephone interviews, as requested, by other parents.
* Review of classrooms and other facilities: The chairperson interviewed staff and reviewed floor plans and photographs to determine general levels of compliance with program requirements.

**Report: For Tier 1 & 2 Tiered Focused Monitoring Reviews**

Following the onsite visit, the onsite team holds an informal exit meeting to summarize its comments for the superintendent or charter school leader. Within approximately 20 business days of the onsite visit, the onsite chairperson forwards to the superintendent or charter school leader the findings from the Tiered Focused Monitoring Review. All districts/charter schools in Tiers 1 and 2, as part of the reporting process, then develop a Continuous Improvement and Monitoring Plan (CIMP) for any criteria receiving a rating of "Partially Implemented," "Not Implemented," and “Implementation in Progress.” The CIMP outlines an action plan, identifies the success metric, describes the measurement mechanism and provides a completion timeframe to bring those areas into compliance with the controlling statute or regulation. Districts and charter schools are expected to incorporate the CIMP actions into their district and school improvement plans, including their professional development plans.

**DEFINITION OF COMPLIANCE RATINGS**

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| **Commendable** | Any requirement or aspect of a requirement implemented in an exemplary manner significantly beyond the requirements of law or regulation. |
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| **Implemented** | The requirement is substantially met in all important aspects. |
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| **Implementation in Progress** | This rating is used for criteria containing new or updated legal requirements and means that the district has implemented any old requirements contained in the criterion and is training staff or beginning to implement the new requirements in such a way that the onsite team anticipates that the new requirements will be implemented by the end of the school year. |
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| **Partially Implemented** | The requirement, in one or several important aspects, is not entirely met. |
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| **Not Implemented** | The requirement is totally or substantially not met. |
| **Not Applicable** | The requirement does not apply to the school district or charter school. |

**Plymouth Public Schools**

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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|  | **Universal Standards**  **Special Education** | **Universal Standards**  **Civil Rights and Other General Education Requirements** | **Targeted Standards** |
| **IMPLEMENTED** | SE 15, SE 32, SE 35, SE 36, SE 50, SE 51, SE 52, SE 52A, SE 54, SE 55, SE 56 | CR 3, CR 7, CR 7A, CR 7B, CR 7C, CR 8, CR 10A, CR 10B, CR 12A, CR 20, CR 21, CR 22, CR 23, CR 24 | SE 44, SE 45,  SE 46, SE 47 |
| **PARTIALLY**  **IMPLEMENTED** |  | CR 10C, CR 16,  CR 17A, CR 25 |  |
| **NOT**  **IMPLEMENTED** | None |  |  |
| **NOT**  **APPLICABLE** | None |  |  |

The review instruments, that include the regulatory requirements specific to the special education and civil rights criteria referenced in the table above, can be found at [www.doe.mass.edu/psm/resources/default.html](http://www.doe.mass.edu/psm/resources/default.html).

| **Improvement Area** **1** |
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| **Criterion:** CR 10C - Student Discipline |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documentation, student records, and staff interviews indicated that the district's discipline procedures are inconsistent with 603 CMR 53.00. Specifically, the district does not consistently provide the student and the parent with a written notice for a hearing prior to imposing a short-term or long-term suspension; include provision of interpreter services in the notice when issued; and provide information on the opportunity to receive education services and make academic progress during the period of removal from school. Additionally, the district does not invite the parent to a meeting to discuss the student's academic performance and behavior, strategies for student engagement, and possible responses to the behavior when imposing an in-school suspension. |
| **LEA Outcome:** The district will be 100% compliant with 603 CMR 53.00. Specifically, the district will consistently provide students and parents with written notice for a hearing prior to imposing a short-term or long-term suspension; include provision of interpreter services in the notice; and provide information regarding educational services and the opportunity to make academic progress during the period of removal from school. In addition, the district will always invite the parent to a meeting to discuss the student's academic performance and behavior, strategies for engagement, and possible responses to the behavior when imposing an in-school suspension. |
| **Action Plan:** By November 15, 2021, the district will revise and submit discipline procedures and notices to ensure compliance with 603 CMR 53.00. The district will also submit evidence that all members of the administrative team responsible for implementation have participated in professional development to review the revised discipline procedures and notices.    By December 17, 2021, the district will submit evidence of dissemination of the revised procedures to members of the school community, including the link to the updated family handbooks on the district website. The district will also submit evidence of an internal review of applicable student records to ensure that the requirements of 603 CMR 53.00 are met. The district will conduct a root cause analysis and implement appropriate corrective actions for any identified noncompliance. |
| **Success Metric:** By December 17, 2021, all discipline procedures and notices will be updated to ensure that all students and parents are provided with written notice that meets all the requirements of 603 CMR 53.00. Additionally, the parent will always be invited to a meeting to discuss the student's academic performance and behavior, strategies for student engagement, and possible responses to the behavior when imposing an in-school suspension.  Evidence:  • Revised discipline procedures  • Revised hearing and suspension notices  • Invitations to parent meetings for students assigned an in-school suspension  • Attendance sheets, agendas, and training materials  • Link to updated family handbooks  • Results of internal record review, root cause analysis, and corrective action steps, as appropriate |
| **Measurement Mechanism:** Continuing after the completion deadline, the Assistant Superintendent will review all discipline procedures, suspension notices, and handbooks annually to ensure they are consistent with 603 CMR 53.00. Additionally, administrative staff responsible for implementing the discipline procedures will be provided with annual professional development. At least once per school year, the district will review student records to ensure ongoing compliance. The district will conduct a root cause analysis and implement appropriate corrective actions for any identified noncompliance. |
| **Completion Timeframe:** 12/17/2021 |
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| **Improvement Area 2** |
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| **Criterion:** 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 |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that although the district sends notice to students and parents for an exit interview to occur prior to the student permanently leaving school without a high school diploma, the notice is not sent within five days from the student's tenth consecutive absence as required by M.G.L. c. 76, s. 18. The district sends this notice after a student has been absent for 15 consecutive days and the notice does not always offer at least two dates and times for an exit interview. |
| **LEA Outcome:** The district will ensure that students who are permanently leaving school without a high school diploma and parents of the student receive a notice within five days from the student's tenth consecutive absence that provides at least two dates and times for an exit interview. |
| **Action Plan:** By November 15, 2021, the district will submit a revised notice that includes at least two dates and times for an exit interview. The district will also submit revised procedures to ensure students and parents receive the notice within five days of a student's tenth consecutive absence. The district will also submit evidence that all members of the administrative team responsible for implementation have participated in professional development to review the revised procedures and notice.  By November 15, 2021, the district will develop an internal monitoring system that includes an automatically generated email that alerts guidance counselors to send the notice within five days from the student’s tenth consecutive absence.  By March 1, 2022, the district will submit evidence of an internal review of attendance records to ensure that notices are sent within five days from a student's tenth consecutive absence. The district will conduct a root cause analysis and implement appropriate corrective actions for any identified noncompliance. |
| **Success Metric:** By March 1, 2022, the district will always send the student and parents the appropriate notice that includes at least two dates and times for an exit interview within five days from the student's tenth consecutive absence.  Evidence:  • Revised procedures and notice  • Attendance sheets, agendas, and training materials  • Results of internal monitoring review, root cause analysis, and corrective action steps, as appropriate |
| **Measurement Mechanism:** Continuing after the completion deadline, the Assistant Superintendent will ensure that all relevant staff are trained on the M.G.L. c. 76, s. 18 requirements at the start of each school year. Additionally, the district will review student records annually to ensure letters are sent to the student and the parent within five days from the student's tenth consecutive absence. The district will conduct a root cause analysis and implement appropriate corrective actions for any identified noncompliance. |
| **Completion Timeframe:** 03/01/2022 |
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| **Improvement Area 3** |
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| **Criterion:** CR 17A - Use of physical restraint on any student enrolled in a publicly-funded education program |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that the district's restraint prevention and behavior support policies are not consistent with 603 CMR 46.00. Specifically, the district's written policies require reporting only restraints lasting more than five minutes or resulting in an injury; state that chemical and mechanical restraints may be used if explicitly authorized by a physician and approved by a parent or guardian; include a provision allowing physical restraint pursuant to a student's IEP; and allow school staff to seek parental consent to waive reporting requirements for students who require frequent use of restraint. District policies do not include methods for preventing student violence, self-injurious behavior, and suicide; methods for engaging parents in discussions about restraint prevention and the use of restraint solely as an emergency procedure; a description of the program's alternatives to physical restraint and method of physical restraint in emergency situations; a procedure for receiving and investigating complaints regarding restraint practices; or a procedure for conducting a periodic review of data and documentation on the use of physical restraints as required by 603 CMR 46.04. Additionally, the district's restraint tracking sheet lists only restraints lasting more than five minutes or resulting in an injury. |
| **LEA Outcome:** The district will be 100% compliant with 603 CMR 46.00. Physical restraint will be used only in emergency situations of last resort, after other lawful and less intrusive alternatives have failed or been deemed inappropriate, and with extreme caution. Specifically, the district policy will prohibit medication (chemical) and mechanical restraint; ensure no individual behavior plan or individualized education program includes the use of physical restraint as a standard response to any behavior; and not allow school staff to seek parental consent to waive reporting requirements for any student. The policy will also address the district’s obligation to track and report all restraints. Additionally, district policies will include methods for preventing student violence, self-injurious behavior, and suicide; methods for engaging parents in discussions about restraint prevention and the use of restraint solely as an emergency procedure; a description of the program's alternatives to physical restraint and method of physical restraint in emergency situations; a procedure for receiving and investigating complaints regarding restraint practices; and a procedure for conducting a periodic review of data and documentation on the use of physical restraints as required by 603 CMR 46.04. All staff will be trained in physical restraint prevention, behavioral supports, and reporting requirements. |
| **Action Plan:** By November 15, 2021, the district will submit a draft of the revised physical restraint and behavior support policies and procedures consistent with 603 CMR 46.00. Additionally, the district will submit the updated restraint tracking sheet that includes all physical restraints, regardless of length.  By December 17, 2021, the district will submit evidence that the physical restraint and behavior support policy has been approved by the School Committee and has been made available to members of the school community. The district will also submit evidence that all staff have received training on physical restraint prevention, behavioral supports, and reporting requirements. |
| **Success Metric:** By March 1, 2022, the district's restraint prevention and behavior support policy and procedures will be 100% compliant with 603 CMR 46.00. Additionally, the district will track and report all restraints. All staff will be trained in physical restraint prevention, behavioral supports, and reporting requirements.  Evidence:  • Revised restraint prevention and behavior support policy and procedures  • Physical restraint tracking sheet  • Minutes of School Committee meeting documenting approval of the revised policy  • Evidence of dissemination of the revised policy and procedures to the school community  • Attendance sheets, agendas, and training materials |
| **Measurement Mechanism:** Continuing after the completion deadline, the Assistant Superintendent will ensure that the restraint prevention and behavior support policy and procedures and school handbooks are reviewed and updated annually for consistency with the current regulations. The Assistant Superintendent will also ensure that all mandated training materials are updated, and all staff are trained on the most current restraint regulations. Additionally, all physical restraints will be tracked and reported, regardless of length. |
| **Completion Timeframe:** 12/17/2021 |
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| **Improvement Area 4** |
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| **Criterion:** CR 25 - Institutional self-evaluation |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that the district does not consistently evaluate all aspects of its K-12 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities, as required by 603 CMR 26.07(1), (4). The district has not conducted a formal institutional evaluation since February 2019. |
| **LEA Outcome:** The district will ensure that all aspects of its K-12 program are reviewed annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status have equal access to all programs, including athletics and other extra-curricular activities. |
| **Action Plan:** By November 15, 2021, the district will submit a plan to conduct an institutional self-evaluation, including the tools that will be used to gather stakeholder input. The district will also submit procedures to ensure that an institutional self-evaluation occurs annually.  By December 17, 2021, the district will submit evidence that data collection, including stakeholder input, has been initiated. The district will provide evidence of professional development for all staff responsible for evaluating its K-12 programs.  By March 1, 2022, the district will submit a summary of the results from the institutional self-evaluation, including the data collected, any identified concerns, a corresponding root cause analysis, and proposed action steps to address concerns. |
| **Success Metric:** By March 1, 2022, the district will complete an institutional self-evaluation, review the results of the evaluation, and develop recommendations based upon identified areas of concern.  Evidence:  • Plan for conducting the 2021-2022 institutional self-evaluation  • Procedures for ensuring an annual institutional self-evaluation  • Tools for gathering stakeholder input  • Attendance sheets, agenda, and training materials  • Narrative summary of data reviewed, identified concerns, root cause analysis, and recommendations |
| **Measurement Mechanism:** Continuing after the completion deadline, the Assistant Superintendent will ensure that all aspects of the district’s K-12 program are evaluated annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. The district will develop an action plan to address any identified issues. |
| **Completion Timeframe:** 03/01/2022 |
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