

**Bridge Boston Charter School**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

**For** **Group A Universal Standards**

**Tier Level** **1**

**Dates of Onsite Visit:** **May 3-4, 2021**

**Date of Final Report:** **September 9, 2021**



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Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Bridge Boston Charter School 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.

School districts and 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 the Bridge Boston Charter School included:

Self-Assessment Phase:

* The charter school reviewed special education and civil rights documentation for required elements including document uploads.
* The charter school 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 charter school’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 charter school 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 charter school’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.

**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. |

**Bridge Boston Charter School**

**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 1, SE 3, SE 3A, SE 8, SE 9, SE 9A, SE 10, SE 11, SE 12, SE 13, SE 14, SE 18A, SE 19, SE 20, SE 22, SE 25,  SE 26, SE 34, SE 35,  SE 40, SE 41, SE 43,  SE 48, SE 49 | CR 13, CR 14, CR 18 | SE 44, SE 45, SE 46, SE 47 |
| **PARTIALLY**  **IMPLEMENTED** | SE 2, SE 6, SE 29 |  |  |
| **NOT IMPLEMENTED** | None |  |  |
| **NOT APPLICABLE** | SE 7, SE 17, SE 37, SE 38, SE 39, SE 42 |  |  |

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).

**SUMMARY OF INDICATOR DATA REVIEW**

As part of the self-assessment process for districts or charter schools undergoing a review for Group A Universal Standards, the onsite team reviewed the results of Indicator data submissions for Indicators 11, 12 and 13. For any Indicator data noncompliance found, the district or charter school must develop and implement corrective action that includes correcting noncompliance for the individual students affected by it, addressing the root cause and underlying reasons for the identified noncompliance, and reviewing additional records as evidence that the issues have been corrected and that requirements are being met. The Office of Special Education Programs (OSEP) requires correction of noncompliance within one year of the finding.

The results of the Department’s analysis regarding these Indicators are as follows:

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|  | **Compliant** | **Non-Compliant** | **Not Applicable** |
| **Indicator 11 – Initial**  **Evaluation Timelines** | X |  |  |
| **Indicator 12 – Early**  **Childhood Transition** |  |  | X |
| **Indicator 13 –**  **Secondary Transition** |  |  | X |

| **Improvement Area** **1** |
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| **Criterion:** SE 2 - Required and optional assessments |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of student records and administrative interviews indicated that the charter school does not complete educational assessments, specifically a history of the student's educational progress in the general education curriculum, and teacher assessments that address attention skills, participation behaviors, communication skills, memory and social relations with groups, peers and adults. |
| **LEA Outcome:** Bridge Boston Charter School (BBCS) will ensure the completion of all required assessments for all eligibility determinations, including a history of the student's educational progress in the general curriculum and a teacher's assessment of the student's attention skills, participation behaviors, communication skills, memory and social relations with groups, peers and adults (Educational Assessment Part A and B). |
| **Action Plan:** By October 20, 2021, BBCS will develop a data collection system to compile the information necessary to complete the Educational Assessment Part A and B. The charter school will also develop an internal monitoring system to ensure that all required assessments are completed.  By November 24, 2021, BBCS will train general education and special education staff on the newly developed data collection system that will provide the information necessary to complete the Educational Assessment Part A and B.  By November 24, 2021, BBCS will complete the Educational Assessment Part A and B and reconvene the Teams for the four students identified by the Department. For each student, the charter school will submit a copy of the completed Educational Assessment Part A and B and the Notice of Proposed School District Action (N1).    By March 25, 2022, BBCS will conduct a review of records for students who had an initial evaluation or a reevaluation after the November 2021 training to ensure that all required assessments were completed. For any records found out of compliance, the charter school will conduct a root cause analysis and develop an action plan for the correction of identified issues. |
| **Success Metric:** By the end of the 2021-2022 school year and beyond, 100% of BBCS's eligibility determinations (initial and reevaluations) will include complete educational assessments, including a history of the student's educational progress in the general education curriculum, and teacher assessments that address attention skills, participation behaviors, communication skills, memory and social relations with groups, peers and adults.  Evidence:   * Data collection system to inform Educational Assessment Part A and B * Description of the internal monitoring system * Training materials, agenda, and signed attendance sheets * Copies of Educational Assessment A and B and N1 for the four students identified * Record review summary with root cause analysis for any records out of compliance and corresponding corrective actions |
| **Measurement Mechanism:** Continuing after the completion deadline:  The Special Education Director will provide training at the beginning of each academic year for all academic staff on the use of the data collection system to gather the information necessary to complete the Educational Assessment Part A and B.  The Special Education Director will implement a quarterly tracking system to ensure the completion of required evaluations, including the Educational Assessment Part A and B, for all initial and re-evaluations. For any noncompliance found, the Special Education Director will conduct a root cause analysis and implement appropriate corrective actions. |
| **Completion Timeframe:** 03/25/2022 |
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| **Improvement Area 2** |
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| **Criterion:** SE 6 - Determination of transition services |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of student records and administrative interviews indicated that beginning no later than when the student is 14 years old, the Team discusses the student's transition needs annually. However, the IEP and the Transition Planning Form do not always include appropriate measurable post-secondary goals related to the student's transition service needs. |
| **LEA Outcome:** Bridge Boston Charter School (BBCS) will ensure that beginning no later than when the student is 14 years old, the IEP and Transition Planning Form (TPF) always include appropriate measurable post-secondary goals that address student employment, education/training, and, when appropriate, independent living skills. |
| **Action Plan:** By October 20, 2021, BBCS will submit transition planning procedures to ensure that the IEP and TPF always include appropriate measurable post-secondary goals. The charter school will also develop an internal monitoring system to ensure compliance.  By November 24, 2021, BBCS will train special educators and upper division general education teachers on the transition procedures and their role as a Team member as it relates to post-secondary goals.  By November 24, 2021, BBCS will reconvene the Team for the two students identified by the Department to update the IEP Vision Statement and TPF so that they include appropriate post-secondary goals. For each student, the charter school will submit copies of the IEP Vision Statement, TPF, and the Notice of Proposed School District Action (N1).  By March 25, 2022, BBCS will conduct a review of five student records for students 14 and older who had Team meetings after the November 2021 training to ensure the IEP and the TPF include appropriate measurable post-secondary goals related to the student's transition service needs. For any records found out of compliance, the charter school will conduct a root cause analysis and develop an action plan for the correction of any identified issues. |
| **Success Metric:** By the end of the 2021-2022 school year and beyond, 100% of IEPs and Transition Planning Forms for students 14 years and older will include appropriate measurable post-secondary goals that address student employment, education/training, and, when appropriate, independent living needs.  Evidence:   * Procedures for the transition process * Description of the internal monitoring system * Training materials, agenda, and signed attendance sheet * Copies of IEP Vision Statement, TPF, and N1 for the two students identified * Record review summary with root cause analysis for any records out of compliance and corresponding corrective actions |
| **Measurement Mechanism:** Continuing after the completion deadline:  The Special Education Director will provide a training at the beginning of each academic year for all special educators and upper division general education teachers on secondary transition procedures.  The Special Education Director will perform a quarterly review of all IEP Vision Statements and TPFs for students 14 years and older to ensure that they contain appropriate measurable post-secondary goals. For any noncompliance found, the Special Education Director will conduct a root cause analysis and implement appropriate corrective actions. |
| **Completion Timeframe:** 03/25/2022 |
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| **Improvement Area 3** |
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| **Criterion:** SE 29 - Communications are in English and primary language of home |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of student records and administrative interviews indicated that special education documents, such as progress reports and assessment summaries, are not consistently translated into the primary language of the home when the primary language is other than English. |
| **LEA Outcome:** Bridge Boston Charter School (BBCS) will ensure that special education documents, such as progress reports and assessment summaries, are translated into the primary language of the home. The charter school will also ensure that notices provided orally or in another mode of communication are documented to include the following:  \* confirmation the charter school has provided such notice in an alternate manner;  \* the content of the notice; and  \* the steps taken to ensure that the parent understands the content of the notice. |
| **Action Plan:** By October 20, 2021, BBCS will develop and disseminate translation procedures and internal office protocols. The charter school will also develop an internal monitoring system to ensure the appropriate provision and documentation of translations.  By November 24, 2021, BBCS will train all staff on the translation procedures and office protocols.  By November 24, 2021, BBCS will submit translations of all special education documents related to the most recent IEP activity for each of the three students identified by the Department.  By March 25, 2022, BBCS will conduct a review of five student records whose parents/guardians require oral and/or written translation. The summary report will indicate the documents translated. For any records found out of compliance, the charter school will conduct a root cause analysis and develop an action plan for the correction of identified issues. |
| **Success Metric:** By the end of the 2021-2022 school year and beyond, 100% of special education documents will be translated for parents/guardians who require translation. For any oral translations, BBCS will maintain written documentation.  Evidence:   * Translation procedures and internal office protocols * Description of the internal monitoring system * Training materials, agenda, and signed attendance sheets * Copies of translated special education documents for the three students identified * Record review summary with root cause analysis for any records out of compliance and corresponding corrective actions |
| **Measurement Mechanism:** Continuing after the completion deadline:  The Special Education Director will provide a training at the beginning of each academic year for all staff on the translation procedures for oral and written translations.  The Special Education Director will perform a quarterly review of all records of students whose parents/guardians require oral and/or written translation. For any noncompliance found, the Special Education Director will conduct a root cause analysis and implement appropriate corrective actions. |
| **Completion Timeframe:** 03/25/2022 |
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