

**Dudley-Charlton Regional School District**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **1**

**Dates of Onsite Visit:** **April 26-27, 2021**

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



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Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Dudley-Charlton Regional School District 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 Dudley-Charlton Regional School District 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.
* Observations of classrooms and other facilities: The chairperson reviewed floor plans and interviewed staff to confirm the locations of classrooms and school facilities used in the delivery of programs and services 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. |

**Dudley-Charlton Regional School District**

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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|  | **Universal Standards**  **Special Education** | **Universal Standards**  **Civil Rights and Other General Education Requirements** |
| **IMPLEMENTED** | SE 15, SE 35, SE 36, SE 44,  SE 45, SE 46, SE 47 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 10A, CR 10B, CR 10C, CR 12A, CR 16, CR 20, CR 21, CR 22, CR 23,  CR 24 |
| **PARTIALLY**  **IMPLEMENTED** | SE 32 | CR 17A |
| **NOT**  **IMPLEMENTED** |  | CR 25 |
| **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:** SE 32 - Parent advisory council for special education |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documentation and interviews indicated that although the district has established a parent advisory council for special education (SEPAC) that advises the district on matters pertaining to the education and safety of students with disabilities, the SEPAC is not involved in the planning, development, and evaluation of the district's special education programs and services. |
| **LEA Outcome:** The district will engage the SEPAC in the planning, development, and evaluation of the district's programs and services by holding quarterly consultation meetings and conducting annual SEPAC surveys. |
| **Action Plan:** By November 15, 2021, the district will develop operational procedures for engaging the SEPAC in the planning, development, and evaluation of the school district's special education programs and services. The plan will include quarterly consultation meetings and an annual SEPAC survey.  By January 22, 2022, the district will conduct consultation meetings with SEPAC officers to address special education program and service planning, development, and evaluation. The district will also work with the SEPAC to develop a survey to gather further information from parents of students with a disability.  By April 22, 2022, the district will send the survey to parents of students with a disability, review the survey results, and document the SEPAC recommendations. The Director of Special Education will discuss the SEPAC's recommendations with school district officials. |
| **Success Metric:** By April 22, 2022, the district will obtain SEPAC input on special education programs and services by conducting consultation meetings, implementing a survey, documenting the SEPAC's recommendations, and sharing recommendations with school district officials.  Evidence:   * Procedures for SEPAC engagement * Schedule of quarterly SEPAC consultation meetings * SEPAC survey, survey results, and recommendations |
| **Measurement Mechanism:** Continuing after the completion deadline, the Special Education Director will hold quarterly consultation meetings with SEPAC officers and work with them to conduct an annual SEPAC survey to ensure the district is engaging the council in the planning, evaluation, and development of district special education programs and services. |
| **Completion Timeframe:** 04/22/2022 |
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| **Improvement Area 2** |
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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 indicated that the district's physical restraint prevention procedures are inconsistent with 603 CMR 46.00. Specifically, the procedures include the use of seclusion, stating that any regularly used seclusion procedure shall be documented and agreed upon as part of a student's behavior intervention plan and/or IEP. The current physical restraint regulations prohibit the use of seclusion, which is defined as "the involuntary confinement of a student alone in a room or area from which the student is physically prevented from leaving." (603 CMR 46.02) |
| **LEA Outcome:** The district's physical restraint prevention and behavior support policy and procedures will be revised so that they include a statement prohibiting seclusion under any circumstance. The district will provide training to all district staff on the revised policy and procedures. |
| **Action Plan:** By November 15, 2021, the district will revise the physical restraint prevention and behavior support policy and procedures to be consistent with 603 CMR 46.00.  By January 22, 2022, the district will submit the revised policy to the School Committee for approval. Upon approval, the district will make the updates available to all members of the school community.  By April 22, 2022, the district will conduct training for all district staff on the revised physical restraint prevention and behavior support and policy and procedures. |
| **Success Metric:** By April 22, 2022, the district's restraint prevention and behavior support policy and procedures will be consistent with the current regulations and will include a statement prohibiting seclusion under any circumstance. All district staff will be trained on the revised policy and procedures.  Evidence:   * Revised restraint policy and procedures * 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:** Following the completion due date, the district will review the restraint prevention and behavior support policy and procedures annually and provide required training to all staff on annual basis. Any inconsistencies identified in the policy and procedures will be revised, additional staff training provided, and changes to the policies and procedures communicated to members of the school community. |
| **Completion Timeframe:** 04/22/2022 |
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| **Improvement Area 3** |
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| **Criterion:** CR 25 - Institutional self-evaluation |
| **Rating:** Not Implemented |
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| **Description of Current Issue:** A review of documentation indicated that the district does not evaluate 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. |
| **LEA Outcome:** The district will 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. |
| **Action Plan:** By November 15, 2021, the district will develop an evaluation plan and identify tools to use for gathering stakeholder input. The district will also develop procedures to ensure that an institutional self-evaluation occurs annually, and training is provided to the staff responsible for completing the evaluation.  By January 22, 2022, the district will conduct a data equity walk using achievement data, discipline data, graduation rates, advanced placement entrance criteria and enrollment, available student supports, and participation in athletics and other extracurricular activities to gauge student access.  By January 22, 2022, the district will conduct surveys of administrators, teachers, families, and students to obtain feedback on student access to the district's programs.  By April 22, 2022, the district will analyze and summarize data gathered from the data equity walk, surveys, and any other relevant data reviewed. The district will develop recommendations and action plans to address any identified lack of access. |
| **Success Metric:** By April 22, 2022, the district will complete and review the results of the institutional self-evaluation and develop recommendations and action plans to address any identified lack of access.  Evidence:   * District's plan for conducting an institutional self-evaluation * Tools to conduct evaluation activities * Procedures for ensuring an annual institutional self-evaluation * Surveys for staff, students, and families * Summary of results from data equity walk and surveys * Narrative summary of identified concerns, recommendations, and action plans |
| **Measurement Mechanism:** Continuing after the completion deadline, the district will maintain a schedule with clear timelines for the completion of an annual institutional self-evaluation of all aspects of its K-12 program to ensure 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 and implement action plans to address any identified lack of access. |
| **Completion Timeframe:** 04/22/2022 |
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