

**Upper Cape Cod Regional Technical School**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **2**

**Dates of Onsite Visit:** **April 27-28, 2021**

**Date of Final Report:** **September 24, 2021**



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Commissioner of Elementary and Secondary Education

During the 2020-2021 school year, Upper Cape Cod Regional Technical 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.

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 Upper Cape Cod Regional Technical School included:

Self-Assessment Phase:

* School reviewed special education and civil rights documentation for required elements including document uploads.
* 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 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 student record from those the 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 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 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. |

**Upper Cape Cod Regional Technical 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 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 8, CR 10A, CR 10B, CR 10C, CR 12A, CR 16, CR 17A, CR 20, CR 21, CR 22, CR 23, CR 24 | SE 44, SE 45,  SE 47 |
| **PARTIALLY**  **IMPLEMENTED** |  | CR 7C, CR 25 | SE 46 |
| **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:** SE 46 - Procedures for suspension of students with disabilities when suspensions exceed 10 consecutive school days or a pattern has developed for suspensions exceeding 10 cumulative days; responsibilities of the Team; responsibilities of the district. |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of student records and staff interviews indicated that the district does not provide parents with the written notice of procedural safeguards on the date that the decision is made for suspension of a student with disability that constitutes a change of placement, as required by 34 CFR 300.530. |
| **LEA Outcome:** Upper Cape Cod Regional Technical School will ensure that parents are provided with the written notice of procedural safeguards on the date that the decision is made for the suspension of a student with a disability that constitutes a change of placement, as required by 34 CFR 300.530. The school will document such provision in the student’s record. |
| **Action Plan:** By October 29, 2021, Upper Cape Cod Regional Technical School will submit updated discipline procedures to ensure parents are provided with the written notice of procedural safeguards and that such provision is documented in the student record. The school will also develop an internal monitoring system that includes an annual review of student records to ensure compliance.  By December 17, 2021, Upper Cape Cod Regional Technical School will provide evidence of training for all relevant staff on the updated discipline procedures.  By March 18, 2022, Upper Cape Cod Regional Technical School will submit the results of an internal review of relevant student records for evidence that the written notice of procedural safeguards is provided to parents on the appropriate date. The school will conduct a root cause analysis and implement appropriate corrective actions for any identified noncompliance. |
| **Success Metric:** By March 18, 2022 and beyond, Upper Cape Cod Regional will always provide parents with the written notice of procedural safeguards on the date that the decision is made for the suspension of a student with a disability that constitutes a change of placement.  Evidence:   * Updated procedures * Internal monitoring system * Agenda, training materials, and signed attendance sheets * Results of record review, root cause analysis, and corrective action steps, as appropriate |
| **Measurement Mechanism:** Continuing after the completion deadline:  Upper Cape Cod Regional Technical School will conduct an annual review of relevant student records to ensure that parents are provided with written notice of procedural safeguards on the date that the decision is made for suspension of a student with disability that constitutes a change of placement, as required by 34 CFR 300.530. The school will conduct a root cause analysis and implement appropriate corrective actions for any noncompliance found. |
| **Completion Timeframe:** 03/18/2022 |
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| **Improvement Area 2** |
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| **Criterion:** CR 7C - Early release of high school seniors |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that the seniors' last school day is more than 12 school days before the regular scheduled closing date of the school. |
| **LEA Outcome:** Upper Cape Cod Regional Technical School will ensure that the final academic school day for seniors no more than 12 school days before the regular scheduled closing date of the school, as required by 603 CMR 27.05. |
| **Action Plan:** By October 29, 2021, Upper Cape Cod Regional Technical School will revise and submit the 2021-2022 school calendar and relevant school policy to meet the requirements of 603 CMR 27.05.  By December 17, 2021, Upper Cape Cod Regional Technical School will submit the school committee minutes indicating approval of the revised 2021-2022 school calendar. The school will also submit evidence that the revised calendar was disseminated to the school community and posted on the school website. |
| **Success Metric:** By August 2022 and beyond, Upper Cape Cod Regional Technical School will always schedule the last academic school day for the senior class no more than 12 school days before the regular scheduled closing date of the school, as required by 603 CMR 27.05.  Evidence:   * Revised 2021-2022 school calendar * Updated policy * School committee minutes documenting approval of the revised calendar * Notification to school community * School website link to revised calendar |
| **Measurement Mechanism:** Continuing after the completion deadline:  Each year, Upper Cape Cod Regional Technical School will present the school committee with a proposed calendar that meets the requirements of 603 CMR 27.05. The school will ensure that the senior class is released no more than 12 school days before the regular closing date of the school. |
| **Completion Timeframe:** 12/17/2021 |
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| **Improvement Area 3** |
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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 evaluate all aspects of its 9-12 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. The district's most recent self-evaluation took place in the 2018-2019 school year. |
| **LEA Outcome:** Upper Cape Cod Regional Technical School will evaluate all aspects of its 9-12 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 October 29, 2021, Upper Cape Cod Regional Technical School will submit a revised School Improvement Plan that explicitly includes the following institutional self-evaluation activities:  • Equity walks conducted by the Assistant Principal, Facilities Director, and Director of Student  Services.  • Data equity walk conducted by the Assistant Principal and Director of Student Services; and  • Surveys completed by students, parents/guardians, and staff members.  The school will also submit copies of the surveys to be distributed to students, parents/guardians, and staff, including those responsible for athletics and other extracurricular activities.  By December 17, 2021, Upper Cape Cod Regional Technical School will submit a summary of the results from the survey, equity walks, and data equity walk, along with initial impressions.  By March 18, 2022, Upper Cape Cod Regional Technical School will submit an institutional self-evaluation report that includes any identified concerns, a corresponding root cause analysis, and proposed action steps to address concerns. |
| **Success Metric:** By March 18, 2022 and beyond, the Leadership Team will complete and review the results of the institutional self-evaluation and develop recommendations based upon identified areas of concern.  Evidence:   * Revised School Improvement Plan with description of institutional self-evaluation activities * Surveys for staff, students, and families * Summary of results from the survey, equity walks, and data equity walk * A narrative summary of identified concerns, root cause analysis, and recommendations |
| **Measurement Mechanism:** Continuing after the completion deadline:  Upper Cape Cod Regional Technical School will maintain a schedule with clear timelines for the completion of an annual evaluation of all aspects of its 9-12 program 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 school will develop and implement action plans to address any access gaps identified in the institutional self-evaluation. |
| **Completion Timeframe:** 03/18/2022 |
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