

**Natick Public Schools**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **2**

**Dates of Onsite Visit:** **May 3-4, 2022**

**Date of Final Report: October 31, 2022**



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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**TIERED FOCUSED MONITORING REPORT**

**Natick Public Schools**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **TIERED FOCUSED MONITORING REPORT INTRODUCTION**

During the 2021-2022 school year, Natick Public Schools participated in a Tiered Focused Monitoring Review (TFM) conducted by the Department’s Office of Public School Monitoring (PSM). The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

Each school district, charter school, vocational school, and virtual school undergoes a Tiered Focused Monitoring Review every three years. The statewide Tiered Focused Monitoring cycle is posted at <<https://www.doe.mass.edu/psm/tfm/6yrcycle.html>>.

Regularly monitored standards are divided into two groups, known as Group A Universal Standards and Group B Universal Standards. Districts and schools are monitored on an alternate set of Universal Standards every three years.

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

The Department has also reserved a specific set of criteria, collectively known as Targeted Standards, employed if LEA or school level risk assessment data indicate there is a potential issue; the 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 the Every Student Succeeds Act (ESSA); 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.

**PSM Team:**

Depending upon the size of a school district and the number of special education programs to be reviewed, a team of one to four Department staff members conducts onsite activities over one to five days in a school district or charter school.

**Tier Level:**

The level of monitoring varies based on tier designation, aligning supports to the level of need and ensuring that districts and schools with greater needs receive appropriate supports to make sustained improvements.

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| Tier | Title | Description | Level of Risk |
| 1 | Self-Directed Improvement | Data points indicate no concern on compliance and student outcomes. | Meets requirements |
| 2 | Directed Improvement | No demonstrated risk in areas with close link to student outcomes. | Low |
| 3 | Corrective Action | Areas of concern include both compliance and student outcomes. | Moderate |
| 4 | Cross-unit Support and Corrective Action | Areas of concern have a profound effect on student outcomes and ongoing compliance. | High |

For the 2021-2022 school year, the tier assignments are based on:

* Five-year cohort graduation rate for students with disabilities
* Public School Monitoring compliance data from the previous review
* Problem Resolution System data, specifically findings of noncompliance
* Special education State Performance Plan/Annual Performance Reports (SPP/APR) compliance Indicator data for Indicators 11, 12, and 13 (Group A only)
* Indicator 11: Child Find
* Indicator 12: Early Childhood Transition
* Indicator 13: Secondary Transition
* Special education SPP/APR performance Indicator data for Indicators 5 & 6
* Indicator 5: Education Environments (6-21)
* Indicator 6: Preschool Environments
* Significant Disproportionality data 2019-2020 & 2020-2021

Tiering adjustments may be made for districts engaged in work with the Department’s Statewide System of Support and have schools identified as requiring assistance and intervention. Tiering assignments may also be adjusted for schools and districts unable to remedy noncompliance within one year of the previous TFM review, as well as for charter schools requiring additional oversight based on conditions of their charter.

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

Following the onsite visit, the PSM team holds an informal exit meeting to summarize the review for the superintendent or charter school leader. Within approximately 20 business days of the onsite visit, the chairperson forwards the TFM Feedback Summary that includes findings from the Tiered Focused Monitoring Review to the superintendent or charter school leader.

As part of the reporting process, all districts/charter schools in Tiers 1 and 2, 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 is due to the Department within 20 business days after the issuance of the Feedback Summary and is subject to the Department’s review and approval.

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. Department staff provide support and assistance to districts and charter schools on the development of a CIMP.

Once the CIMP is approved, it is issued as the Final Report.

Department staff also provide ongoing technical assistance as the school or district is implementing the approved CIMP or CAP. **School districts and charter schools must demonstrate effective resolution of noncompliance identified by the Department as soon as possible but in no case later than one year from the issuance of the Department’s Feedback Summary.**

For more information regarding the TFM Review Process, including district and parent resources, please visit < <https://www.doe.mass.edu/psm/tfm/default.html>>.

# **TIERED FOCUSED MONITORING FINAL REPORT**

**for Natick Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review at Natick Public Schools during the week of May 3, 2022, to evaluate the implementation of Group B Universal Standards in the program areas of special education, civil rights, and other related general education requirements. The team appreciated the opportunity to interview staff and parents, to observe classroom facilities, and to review the programs underway in the district.

In preparing this report, the team reviewed extensive written documentation regarding the operation of the district's programs, together with information gathered by means of the following Department program review methods:

**Self-Assessment Phase:**

* District review of special education and civil rights documentation for required elements including document uploads.
* Upon completion of the self-assessment, the district submitted the data to the Department for review.

**On-site Verification Phase:**

* Interviews of administrative, instructional, and support staff consistent with those criteria selected for onsite verification.
* Interview of a parent advisory council (PAC) representative.
* Review of additional documents for special education and civil rights.
* Surveys of parents of students in special education: Parents of students in special education were sent a survey that solicited information regarding their experiences with the district’s implementation of special education programs, related services, and procedural requirements.
* Observations of classrooms and other facilities: The onsite team visited a sample of classrooms and other school facilities used in the delivery of programs and services to determine general levels of compliance with program requirements.

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| The Tiered Focused Monitoring Report includes those criteria that were found by the team to be implemented in a “Commendable” manner, as well as criteria receiving a rating of "Partially Implemented," "Not Implemented," and “Implementation in Progress.” (Refer to the “Definition of Compliance Ratings” section of the report.) The Tiered Focused Monitoring Reports do not include criteria receiving a rating of “Implemented” or “Not Applicable.” This will allow the district/school and the Department to focus their efforts on those areas requiring corrective action. Districts are expected to incorporate the corrective actions into their district and school improvement plans, including their professional development plans. |
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# **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; 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. |

**Natick Public Schools**

# **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 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 10C, CR 12A, CR 20,  CR 21, CR 22, CR 23, CR 24 |
| **PARTIALLY**  **IMPLEMENTED** |  | CR 16, CR 17A, CR 25 |
| **NOT**  **IMPLEMENTED** | None |  |
| **NOT**  **APPLICABLE** | None |  |

The full list of criteria and information regarding the requirements for each can be found in Appendix B of the Tiered Focused Monitoring Toolkit available at < <https://www.doe.mass.edu/psm/resources/tfm-toolkit.docx>>.

| **CONTINUOUS IMPROVEMENT AND MONITORING PLAN** |
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| **Improvement Area** **1** |
| **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 documentation and interviews indicated that although the district sends a notice within five days of a student's tenth consecutive absence to the student and the parent/guardian, the notice does not include the following requirements:  • Two suggested dates and times for an exit interview;  • The date and time for the exit interview may be extended at the request of the parent/guardian,  but for no longer than 14 days;  • The exit interview shall occur within 10 days of the notice; and  • The parties shall agree to the date and time for the exit interview. |
| **LEA Outcome:** Natick Public Schools will ensure that the notice sent to students 16 or over who have ten consecutive absences always includes the following requirements:  • Two suggested dates and times for an exit interview;  • The date and time for the exit interview may be extended at the request of the parent/guardian, but for no longer than 14 days;  • The exit interview shall occur within 10 days of the notice; and  • The parties shall agree to the date and time for the exit interview.  In addition, the district will always send annual written notices to former students who have not yet earned their competency determination and who have not transferred to another school to inform them of the availability of publicly funded post-high school academic support programs and encourage them to participate in those programs. The notice will be sent for at least two years after a student's departure from high school. |
| **Action Plan:** By December 12, 2022, the district will submit the revised notice sent to students 16 or older within five days of the student's tenth consecutive absence that includes all the requirements. The district will also submit an annual written notice sent to former students who have not yet earned their competency determination and who have not transferred to another school. Additionally, the district will submit updated outreach procedures for ensuring the requirements for both notices are met.  By March 23, 2023, the district leadership will submit evidence of training applicable staff on the updated notices and procedures.  By May 19, 2023, the district will submit the results of an administrative review of student records to ensure that both updated notices are sent as required and include all necessary information. For any non-compliance identified, the district will submit the results of a root cause(s) analysis and description of corrective actions implemented. |
| **Success Metric:** By May 2023 and beyond, the district will ensure that all notices sent to students 16 or over within five days of the student's tenth consecutive absence include all requirements. In addition, the district will send an annual written notice to former students who have not yet earned their competency determination and who have not transferred to another school to inform them of the availability of publicly funded post-high school academic support programs and encourage them to participate in those programs. At a minimum, this notice will be sent to each such student who attended high school within the past two years.  Evidence:   * Revised notice templates * Updated procedures * Staff training agendas, training materials, and signed attendance sheets * Results of an administrative record review * Root cause analysis and corrective action taken for any non-compliance found |
| **Measurement Mechanism:** Continuing after the completion deadline, the Director of Student Services will conduct an annual review of all notices to ensure that the contents are compliant with regulations and that information related to availability of publicly funded post-high school academic support is current and accurate. Additionally, the Director of Student Services will conduct an annual review of student records to ensure that the updated notices are sent as required. For any non-compliance identified, the district leadership will determine the root cause(s) and implement necessary corrective actions. |
| **Completion Timeframe:** 05/19/2023 |
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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 documentation and interviews indicated that the district's physical restraint prevention and behavior support policy and procedures have not been updated to include methods for preventing student violence, self-injurious behavior, and suicide; methods for engaging parents in discussions about restraint prevention and use; a description and explanation of the program's alternatives to physical restraint; and methods of physical restraint in emergency situations. |
| **LEA Outcome:** Natick Public Schools will ensure the district's restraint prevention and behavior support policy and procedures are consistent with the regulations under 603 CMR 46.00 regarding appropriate responses to student behavior that may require immediate intervention. |
| **Action Plan:** By December 12, 2022, the district will submit restraint prevention and behavior support policy and procedures that are consistent with regulations under 603 CMR 46.00.  By March 23, 2023, the district will submit evidence that the updated restraint prevention and behavior support policy and procedures have been approved by the school committee.  By May 19, 2023, district will submit evidence of all staff training on the revised restraint prevention and behavior support policy and procedures and dissemination to members of the school community. |
| **Success Metric:** By May 2023 and beyond, the district's restraint prevention and behavior support policy and procedures will be consistent with regulations under 603 CMR 46.00.  Evidence:   * Revised restraint prevention and behavior support policy and procedures * School committee meeting agenda and minutes demonstrating policy approval * Training materials and staff training records * Documentation of dissemination including link to updated websites |
| **Measurement Mechanism:** Continuing after the completion deadline, the district will conduct an annual review of the physical restraint policy and procedures to ensure ongoing compliance with current state and federal regulations. The district will also ensure that all staff receive the required annual training. |
| **Completion Timeframe:** 05/19/2023 |
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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 documentation and interviews indicated that the district does not annually evaluate all aspects of its K-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. |
| **LEA Outcome:** Natick Public Schools 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 homelessness, have equal access to all programs, including athletics and other extracurricular activities. The district will make changes as indicated by the evaluation. |
| **Action Plan:** By December 12, 2022, principals will develop and present their School Improvement Plans to the School Committee. Such plans will include goals and strategies to implement equity-based practices for achievement, bullying and discipline, athletics and extracurriculars, and distribution of students in programs.  By December 12, 2022, the Administrative Council, which includes principals and assistant principals, will review the district’s strategic plan around diversity, equity, and inclusion. The Council will review the required data collection and analysis procedures to ensure that data regarding achievement, bullying and discipline, athletics and extracurriculars, and distributions of students in programs is included.  By December 12, 2022, a new building walk-through "look-for" document will be implemented by all district evaluators that identifies specific equity practices in the classroom setting and other school-based environments.  By March 23, 2023, principals will provide their mid-year State of the Union reports (which include an analysis of school program data for equal access) to the full Administrative Council and report out on current data regarding equal access. Recommendations for any changes to programming to ensure equal access will be made and incorporated through the remainder to the school year, as appropriate.  By July 20, 2023, principals will provide their end-of-year State of the Union reports to the full Administrative Council and report out on end-of-year end data regarding equal access to all programs. Recommendations based on the State of the Union analyses (data from the entire district) regarding equitable practices will be provided to the Superintendent to inform the new District-wide Strategic Plan and School Improvement Plans for the 2022-2023 school year. |
| **Success Metric:** By July 2023 and beyond, the district will complete its annual State of the Union data analysis and recommendation process for the next year's Strategic Plan goals and School Improvement Plans.  Evidence:   * Administrative Council minutes * Data collection and analysis procedures * Copy of “look-for” tool and summary of results * Mid-Year and End-of-Year State of the Union reports/district data analysis * District Strategic Plan * School Improvement Plans |
| **Measurement Mechanism:** Annually, the district will conduct an institutional self-evaluation through strategic planning, school improvement plans, and state of the union process 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 district programs, including athletics and other extracurricular activities. As a result of the evaluation, the district will take appropriate actions to address identified issues of access. |
| **Completion Timeframe:** 07/20/2023 |
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