

**Truro Public Schools**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **1**

**Dates of Onsite Visit:** **April 26-28, 2022**

**Date of Final Report:** **August 5, 2022**



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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**TIERED FOCUSED MONITORING REPORT**

**Truro Public Schools**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **TIERED FOCUS MONITORING REPORT INTRODUCTION**

During the 2021-2022 school year, Truro 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**

**Truro Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review at Truro Public Schools during the week of April 25, 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. |

# **SUMMARY OF COMPLIANCE CRITERIA RATINGS**

**Truro Public Schools**

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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 | CR 3, CR 7, CR 7A, CR 7B, CR 8, CR 10C, CR 12A, CR 20, CR 21,  CR 22, CR 23, CR 24 |
| **PARTIALLY**  **IMPLEMENTED** | SE 56 | CR 10A, CR 10B, CR 17A |
| **NOT IMPLEMENTED** |  | CR 25 |
| **NOT APPLICABLE** |  | CR 7C, CR 16 |

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:** SE 56 - Special education programs and services are evaluated |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that although the district recently contracted with a vendor to evaluate the preschool program, the district does not currently evaluate its special education programs and services on a regular basis. |
| **LEA Outcome:** Truro Public Schools, in partnership with the SEPAC, will evaluate special education programs and services on a regular basis. As a result of the evaluations, the district will identify any areas of growth or concern and develop necessary actions steps. |
| **Action Plan:** By October 7, 2022, the district will develop evaluation protocols, along with a multi-year calendar to ensure that the continuum of special education programs and services are evaluated. The protocols will include data sources, methods of analysis, SEPAC involvement, and the person/role leading the evaluation.    By March 7, 2023, the district will review the comprehensive special education preschool program evaluation provided by the vendor and, in partnership with the SEPAC, develop a plan for implementation of recommendations.  By March 7, 2023, the district will share the results of the evaluation of the preschool program with the school community, including parents, staff, and school committee. |
| **Success Metric:** By March 2023 and beyond, special education program and service evaluations will be completed on a regular basis.  Evidence:   * Evaluation protocols and schedule for future review * Special education preschool program evaluation report and implementation plan * Dissemination to the school community |
| **Measurement Mechanism:** The district will plan and schedule a review of special education programs and services to occur on a regular basis. The district, in partnership with SEPAC, will utilize information from evaluation reports to create action plans for continuous improvement in the special education programs. |
| **Completion Timeframe:** 03/07/2023 |
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| **Improvement Area 2** |
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| **Criterion:** CR 10A - Student handbooks and codes of conduct |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated the district has not developed a staff code of conduct. |
| **LEA Outcome:** Truro Public Schools will develop a staff code of conduct that includes all requirements under M.G.L. c. 71, § 37H and distribute it to all members of staff at the beginning of each year, and any new staff joining the district during the year. |
| **Action Plan:** By October 7, 2022, the district will develop a staff code of conduct that includes all requirements under M.G.L. c. 71, § 37H.  By December 7, 2022, the district will obtain school committee approval of the staff code of conduct.  By December 7, 2022, the district will distribute the code of conduct to all members of staff and provide staff training. |
| **Success Metric:** By December 2022 and beyond, the district will maintain a staff code of conduct that meets all regulatory requirements.  Evidence:   * Staff code of conduct * School committee approval * Agenda and attendance sheets * Dissemination to staff |
| **Measurement Mechanism:** Annually, the Superintendent and administrative team will review the staff code of conduct to ensure consistency with the regulations and disseminate the code of conduct to all staff at the beginning of the school year. |
| **Completion Timeframe:** 12/07/2022 |
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| **Improvement Area 3** |
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| **Criterion:** CR 10B - Bullying Intervention and Prevention |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that the definition of bullying in the Bullying Prevention and Intervention Plan and the student handbook do not include staff as a potential aggressor. |
| **LEA Outcome:** Truro Public Schools will update the existing Bullying Prevention and Intervention Plan (Plan) and student handbook to include staff as a potential aggressor. |
| **Action Plan:** By October 7, 2022, the district will update and submit for school committee approval an updated Plan that includes staff as a potential aggressor. The Plan will make clear that members of school staff, include, but are not limited to, educators, administrators, school nurses, cafeteria workers, custodians, bus drivers, athletic coaches, advisors to an extracurricular activity and paraprofessionals.    By December 7, 2022, the district will revise the student handbook to include the staff as a potential aggressor and will post the updated Bullying Prevention and Intervention Plan and student handbook on the district website. |
| **Success Metric:** By December 2023 and beyond, the district's Bullying Prevention and Intervention Plan and student handbook will include staff as a potential aggressor.  Evidence:   * Revised Bullying Prevention and Intervention Plan * Revised student handbook * Links to updated Plan and handbook on school website |
| **Measurement Mechanism:** Annually, the Superintendent and administrative team will review the Bullying Prevention and Intervention Plan and the school handbook to ensure consistency with the regulations. Additionally, the district will provide parents, guardians, and staff annual written notice of the Bullying Prevention and Intervention Plan. |
| **Completion Timeframe:** 12/07/2022 |
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| **Improvement Area 4** |
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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 recently developed written physical restraint prevention and behavior support policy and procedures consistent with 603 CMR 46.00. However, the district has not obtained school committee approval or conducted staff training on the new policy and procedures, as required by 603 CMR 46.04(2). |
| **LEA Outcome:** Truro Public Schools will obtain school committee approval for the district's written restraint prevention and behavior support policy. In addition, the district will train all staff on physical restraint prevention, behavioral supports, and reporting procedures. |
| **Action Plan:** By October 7, 2022, the school committee will approve the district's written restraint prevention and behavior support policy.  By December 7, 2022, the district will ensure that all staff have received training on the physical restraint prevention and behavior support policy and procedures. Additionally, the district will submit evidence of dissemination of the revised policy and procedures to members of the school community. |
| **Success Metric:** By December 2023 and beyond, the district will obtain school committee approval for any changes to the restraint prevention and behavior support policy. Additionally, all district staff will be trained annually on the physical restraint prevention and behavior support policy and procedures.  Evidence:   * School committee approval of the restraint prevention and behavior support policy * Attendance sheets, agendas, and training materials * Evidence of dissemination to the school community |
| **Measurement Mechanism:** Continuing after the completion deadline, the Superintendent and administrative team will ensure that the restraint prevention and behavior support policy and procedures are reviewed and updated annually for consistency with the current regulations. All policy changes will be presented to the school committee for approval. The Superintendent and administrative team will also ensure that all mandated training materials are updated, and that all staff are trained annually on the most current restraint regulations. |
| **Completion Timeframe:** 12/07/2022 |
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| **Improvement Area 5** |
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| **Criterion:** CR 25 - Institutional self-evaluation |
| **Rating:** Not 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 K-6 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:** Truro Public Schools will evaluate all aspects of its K-6 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. The evaluation will incorporate equity walks, surveys, and review of data. Feedback from administrators, content supervisors, teachers, students, and families will be included in the evaluation. The district will create an action plan to address any concerns identified. |
| **Action Plan:** By October 7, 2022, district leadership will receive training from the Department on conducting an institutional self-evaluation.  By December 7, 2022, administrators will conduct equity walks and observe a variety of classrooms to evaluate teachers' ability to support equity and inclusion for all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability or housing status.  By December 7, 2022, administrators will conduct data walks to analyze and discuss equity using achievement data, supports for students, policies and handbook procedures, bullying and discipline data, complaints about accessibility, and distribution of students in programs.    By March 7, 2023, the district will conduct surveys for administrators, teachers, families, and students to obtain feedback about equal access for all students.  By March 7, 2023, the district will analyze survey results, identify discrepancies or concerns, and set goals and timelines to address any identified areas of concern. |
| **Success Metric:** By March 2023 and beyond, the district will complete an institutional self-evaluation, review the results of the evaluation, and develop recommendations and corresponding action steps based upon identified areas of concern.  Evidence:   * Procedures for conducting an annual institutional self-evaluation * Surveys for staff, students, and families * Summary of results from the equity walks, data equity walks, and surveys * A narrative summary of identified concerns, root cause analysis, recommendations, and action plans |
| **Measurement Mechanism:** Continuing after the completion deadline, the district will conduct annual institutional self-evaluations 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 the district's programs and take appropriate actions to address identified issues. |
| **Completion Timeframe:** 03/07/2023 |
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