

**Easton Public Schools**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **1**

**Dates of Onsite Visit:** **May 22-23, 2023**

**Date of Final Report: November 9, 2023**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**TIERED FOCUSED MONITORING REPORT**

**Easton Public Schools**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **TIERED FOCUSED MONITORING REPORT INTRODUCTION**

During the 2022-2023 school year, Easton 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 September 20, 2022.

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

For the 2022-2023 school year, the tier assignments are based on:

* Annual drop-out rate for students with disabilities
* 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 SPP/APR compliance Indicator data for Indicators 4B, 9 & 10
	+ Indicator 4B: Significant discrepancy by race or ethnicity in removal of students with

 IEPs greater than 10 days

* + Indicator 9: Overall disproportionate representation of racial and ethnic groups identified

 as eligible for special education

* + Indicator 10: Disproportionate representation of racial and ethnic groups within specific

 disability categories

* Special education SPP/APR performance Indicator data for Indicators 5 & 6
	+ Indicator 5: Education Environments (6-21)
	+ Indicator 6: Preschool Environments
* Significant Disproportionality data 2021-2022 & 2022-2023

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. **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 Easton Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review in Easton Public Schools during the week of May 22, 2023, to evaluate the implementation of Group A 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 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.
* District review of a sample of special education student records selected across grade levels, disability categories, and levels of need.
* District review of student records related to the Indicator Data Collection for Indicators 11, 12, and 13.
* Upon completion of the self-assessment, the district submitted the data to the Department for review.

**On-site Verification Phase:**

* Interviews of administrative and support staff consistent with those criteria selected for onsite verification.
* Interviews of parent advisory council (PAC) representatives.
* 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.
* 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 have been met.
* Observations of classrooms and other facilities.

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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.) 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. |
|  |
| **Not Implemented** | The requirement is totally or substantially not met. |
| **Not Applicable**  | The requirement does not apply to the school district or charter school. |

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

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

# **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 PSM team reviewed the results of Indicator data submissions for Indicators 11, 12 and 13. The Indicator review is completed prior to the onsite visit and helps inform the scope of the onsite review. 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 district’s submissions for these Indicators are as follows:

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

The district submitted evidence of corrective action, including an additional data set, to address the non-compliance identified for Indicator 12. The submissions have been reviewed and approved by the Department; no further action is required.

| **CONTINUOUS IMPROVEMENT AND MONITORING PLAN** |
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| **Improvement Area** **1** |
| **Criterion:** SE 9 - Timeline for determination of eligibility |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of student records and staff interviews indicated that within 45 school-working days after receipt of the parent's/guardian's written consent to an initial evaluation or a re-evaluation, the district does not consistently provide the parent/guardian with the proposed IEP and proposed placement for eligible students. |
| **LEA Outcome:** Within 45 school-working days after receipt of the parent's/guardian's written consent to an initial evaluation or a re-evaluation, the district will consistently provide the parent/guardian with the proposed IEP and proposed placement for eligible students. |
| **Action Plan:** By November 28, 2023, the Director of Special Services will review and update the procedures for providing the proposed IEP and placement following an initial evaluation or a re-evaluation to ensure the required timelines are met. The revised procedures will include a description of an internal monitoring system to track timelines. By February 26, 2024, the district will provide training to all relevant staff on the revised procedures and the internal monitoring system. By May 24, 2024, the district will submit the results of a review of ten evaluation records to determine whether the IEP and placement are provided within 45 school-working days of receipt of evaluation consent. For any identified noncompliance, the district will conduct a root cause analysis and implement appropriate corrective action. |
| **Success Metric:** By May 2024 and beyond, the district will always provide the proposed IEP and placement to parents/guardians of eligible students within the required timelines. Evidence: * Written procedures
* Description of internal monitoring system
* Training agendas, materials, and attendance sheets
* Results of internal record review
* Root cause analysis and corrective actions, if necessary
 |
| **Measurement Mechanism:** Continuing after the completion deadline, the district will provide training to all relevant staff, at least annually, on the required IEP provision timelines and the internal monitoring system. The Director of Special Services will conduct quarterly internal monitoring activities to ensure ongoing compliance. For any identified noncompliance, the district will conduct a root cause analysis and implement appropriate corrective action. |
| **Completion Timeframe:** 05/24/2024 |
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| **Improvement Area 2** |
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| **Criterion:** SE 14 - Review and revision of IEPs |
| **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 always provide parents/guardians with a proposed IEP and a proposed placement immediately following the development of the IEP. |
| **LEA Outcome:** The district will always provide parents/guardians with a proposed IEP and a proposed placement immediately following the development of the IEP. |
| **Action Plan:** By November 28, 2023, the Director of Special Services will review and update the district's procedures to ensure immediate provision of the IEP and placement. The procedures will include a description of an internal monitoring system to ensure ongoing compliance. By February 26, 2024, the district will provide training to all relevant staff on the revised procedures and the internal monitoring system. By May 24, 2024, the district will submit the results of a review of ten student records to determine whether the proposed IEP and placement are provided to parents/guardians within the required timelines. For any identified noncompliance, the district will conduct a root cause analysis and implement appropriate corrective action. |
| **Success Metric:** By May 2024 and beyond, the district will always provide parents/guardians with a proposed IEP and proposed placement immediately following the development of the IEP. Evidence: * Written procedures
* Description of internal monitoring system
* Training agendas, materials, and attendance sheets
* Results of internal record review
* Root cause analysis and corrective actions, if necessary
 |
| **Measurement Mechanism:** Continuing after the completion deadline, all relevant staff will be trained at least annually on the requirements for immediate provision of the IEP and placement and the internal tracking and monitoring system. The Director of Special Services will conduct quarterly internal monitoring activities to ensure ongoing compliance. For any identified noncompliance, the district will conduct a root cause analysis and implement appropriate corrective action. |
| **Completion Timeframe:** 05/24/2024 |
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| **Improvement Area 3** |
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| **Criterion:** SE 42 - Programs for young children three and four years of age |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that, although the district opened an additional preschool classroom during the 2022-2023 school year, 5 of the district's 7 preschool classes do not meet the following requirements for appropriate student ratios and class sizes: Inclusionary programs: * For public school programs that integrate students with and without disabilities, the class size should not exceed 20 with 1 teacher and 1 aide and no more than 5 students with disabilities. If the number of students with disabilities is 6 or 7 then the class size does not exceed 15 students with 1 teacher and 1 aide.

Substantially separate programs: * Substantially separate programs are programs in which more than 50% of the students have disabilities.
* Substantially separate programs operated by the district limit class sizes to 9 students with 1 teacher and 1 aide.

Specifically, the instructional grouping sizes and ratios for the five identified groups are as follows:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Class Name | Students with Disabilities | Students without disabilities | Teacher | Aide |
| PK Integrated AM  | 8 | 7 | 1 | 2 |
| PK Integrated Full Day  | 7 | 9 | 1 | 2 |
| PK Integrated Full Day  | 7 | 9 | 1 | 2 |
| PK Integrated Full Day  | 7 | 9 | 1 | 2 |
| PK Substantially Separate  | 10 | 0 | 1 | 3 |

 |
| **LEA Outcome:** The district will ensure all preschool classes meet the requirements for appropriate student ratios and class sizes. |
| **Action Plan:** By November 28, 2023, the district will submit procedures for ensuring the preschool instructional groupings meet requirements throughout each school year. The procedures will include a description of the internal monitoring and tracking system to ensure ongoing compliance. The district will also upload a preschool instructional grouping worksheet demonstrating compliance for the five identified preschool classes. By February 26, 2024, the district will submit evidence that all relevant staff have been trained on the requirements for preschool instructional groupings, district procedures, and the internal monitoring system. The district will also submit evidence that any additional parties necessary for the approval of procedure elements, such as budgeting and staffing, have been informed of the preschool special education grouping requirements. By May 24, 2024, the district will confirm that the internal monitoring system is utilized to track compliance and proactively address any potential issues. |
| **Success Metric:** By May 2024 and beyond, the district will ensure that all preschool groupings meet requirements. Evidence: * Preschool instructional grouping worksheets
* Grouping procedures, including internal monitoring/tracking system
* Training agendas, materials, and attendance sheets
* Confirmation of implementation of tracking system
 |
| **Measurement Mechanism:** Continuing after the completion due date, the district will implement internal monitoring activities to ensure ongoing compliance with the requirements. For any noncompliance identified, the district will conduct a root cause analysis and implement appropriate corrective actions. Additionally, all relevant staff and any additional parties necessary for budgeting and staffing approval will receive annual training on requirements. |
| **Completion Timeframe:** 05/24/2024 |
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| **Improvement Area 4** |
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| **Criterion:** CR 18 - Responsibilities of the school principal |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** The district updated the District Curriculum Accommodation Plan (DCAP) in the spring of 2023, trained staff on the revised plan, and implemented a student support system incorporating general education teacher documentation of in-class DCAP interventions. However, a review of documents and interviews indicated that the current DCAP does not include direct and systematic instruction in reading and is not yet implemented consistently across the district. |
| **LEA Outcome:** The district will ensure that the DCAP includes direct and systematic instruction in reading and is consistently implemented across the district. |
| **Action Plan:** By November 28, 2023, the district will submit an updated DCAP that includes direct and systematic instruction in reading that has been approved by district leadership. The district will also submit a description of an internal monitoring system to ensure the DCAP is implemented consistently across the district. By February 26, 2024, the district will provide training to all relevant staff on the revised DCAP and the internal monitoring system to ensure that students receive appropriate services and support within the general education setting, including direct reading instruction when appropriate. By May 24, 2024, the district will submit evidence of conducting internal monitoring activities to determine if the DCAP is implemented across the district. The district will conduct a root cause analysis and implement appropriate corrective actions to address any inconsistency in implementation. |
| **Success Metric:** By May 2024 and beyond, the DCAP will include direct and systematic instruction in reading and will be implemented consistently across the district to ensure students are provided with appropriate services and support within the general education program. Evidence: * Updated DCAP
* Evidence of district leadership approval
* Description of internal monitoring
* Training agendas, materials, and attendance sheets
* Results of internal monitoring and evidence of DCAP implementation
* Root cause analysis and corrective action, if necessary
 |
| **Measurement Mechanism:** Continuing after the completion deadline, the district will train all relevant staff at least annually on DCAP implementation. Additionally, the district will conduct regular monitoring activities to ensure consistent implementation across the district. For any inconsistencies identified, the district will conduct a root cause analysis and implement corrective actions, including, but not limited to, additional teacher training and coaching. |
| **Completion Timeframe:** 05/24/2024 |
|  |