

**Mohawk Trail /Hawlemont Regional School Districts**

**Tiered Focused Monitoring Report**

**Continuous Improvement and Monitoring Plan**

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

**Tier Level** **2**

**Dates of Onsite Visit:** **December 13-14, 2022**

**Date of Final Report: March 23, 2023**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**TIERED FOCUSED MONITORING REPORT**

**Mohawk Trail /Hawlemont Regional School Districts**

[TIERED FOCUSED MONITORING REPORT INTRODUCTION 3](#_Toc130474692)

[TIERED FOCUSED MONITORING FINAL REPORT 6](#_Toc130474693)

[DEFINITION OF COMPLIANCE RATINGS 7](#_Toc130474694)

[SUMMARY OF COMPLIANCE CRITERIA RATINGS 8](#_Toc130474695)

[CONTINUOUS IMPROVEMENT AND MONITORING PLAN 9](#_Toc130474696)

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

# **TIERED FOCUSED MONITORING REPORT INTRODUCTION**

During the 2022-2023 school year, Mohawk Trail/Hawlemont Regional School Districts 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 |
| 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 Mohawk Trail /Hawlemont Regional School Districts**

The Massachusetts Department of Elementary and Secondary Education conducted a Tiered Focused Monitoring Review in Mohawk Trail/Hawlemont Regional School Districts during the week of December 12, 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 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 solicits information regarding their experiences with the districts’ implementation of special education programs, related services, and procedural requirements.
* 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 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. |

**Mohawk Trail /Hawlemont Regional School Districts**

# **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 50, SE 51, SE 52, 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, CR 25 |
| **PARTIALLY****IMPLEMENTED** | SE 32 | CR 16, CR 17A |
| **NOT** **IMPLEMENTED** | None | None |
| **NOT** **APPLICABLE** | SE 52A |  |

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>>.

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| **CONTINUOUS IMPROVEMENT AND MONITORING PLAN** |
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| **Improvement Area** **1** |
| **Criterion:** SE 32 - Parent advisory council for special education |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that the district has established a district-wide parent advisory council on special education (SEPAC). Membership is offered to all parents of students with disabilities and other interested parties. The SEPAC has established by-laws, officers, and operational procedures, and a workshop on the rights of students and parents/guardians is conducted annually with the school district. However, the SEPAC does not participate in the planning, development, and evaluation of the school district's special education programs and does not advise the district on matters that pertain to the education and safety of students with disabilities. |
| **LEA Outcome:** The district will include SEPAC members in the planning, development, and evaluation of the school district's special education programs and provide opportunities for the SEPAC to advise the district on matters that pertain to the education and safety of students with disabilities. |
| **Action Plan:** By May 9, 2023, the Director of Pupil Personnel Services, in collaboration with the SEPAC, will collect, review, and analyze the results of the 2022 parent survey that was sent to solicit feedback on topics including parent participation in Team meetings, IEP development, staff preparedness for Team meetings, and access to educational assessments. Evidence will include a summary of the survey responses and action steps. By October 6, 2023, the Director of Pupil Personnel Services, in collaboration with the SEPAC, will submit a schedule of meetings for the 2023-2024 school year, as well as a description of how the SEPAC will participate in the planning, development, and evaluation of the district's special education programs and how the SEPAC will advise the district on matters that pertain to the education and safety of students with disabilities. |
| **Success Metric:** By October 2023 and beyond, the SEPAC will regularly advise district administration on matters that pertain to the education and safety of students with disabilities and participate in the planning, development, and evaluation of special education programs. Evidence: • Summary of SEPAC survey results and action plan • Meeting schedule • Narrative description of how SEAPC will advise district |
| **Measurement Mechanism:** The Director of Pupil Personnel Services will ensure that the SEPAC is involved annually in the planning, development, and evaluation of the district's special education programs and advises the district on matters that pertain to the education and safety of students with disabilities. This will be completed through collaboration at SEPAC meetings and the use of an annual parent survey. |
| **Completion Timeframe:** 10/06/2023 |
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| **Improvement Area 2** |
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| **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 documents and staff interviews indicated that the notice sent to the student and the parent/guardian within five days from the student's tenth consecutive absence does not offer at least two dates and times for an exit interview between the superintendent (or designee), the student, and the parent/guardian prior to the student permanently leaving school. Also, the annual written notice sent to former students who have not yet earned their competency determination and who have not transferred to another school is addressed only to the student’s parent/guardian, not the student. |
| **LEA Outcome:** The district will ensure that the notice sent to the student and the parent/guardian within five days from the student's tenth consecutive absence will offer at least two dates and times for an exit interview between the superintendent (or designee), the student, and the parent/guardian prior to the student permanently leaving school. The annual written notice sent to former students who have not yet earned their competency determination and who have not transferred to another school will be addressed to the student and parent/guardian. |
| **Action Plan:** By May 9, 2023, the district will submit the updated notices and a description of an internal monitoring system to ensure compliance. By November 30, 2023, the district will conduct an internal review of applicable student records to ensure that the updated notices were sent to students with ten consecutive absences and to former students who have not yet earned their competency determination and who have not transferred to another school. The district will conduct a root cause analysis and implement appropriate corrective actions for any identified noncompliance. |
| **Success Metric:** By November 2023 and beyond, the district will ensure that students receive the updated written notices from the district, as appropriate. Evidence: • Revised notice sent to the student and the parent/guardian within five days from the student's tenth consecutive absence • Revised annual notice sent to former students who have not yet earned their competency determination and who have not transferred to another school • Internal monitoring system • Results of internal monitoring review, root cause analysis, and corrective action steps, as appropriate |
| **Measurement Mechanism:** The Director of Pupil Personnel Services will annually monitor the two notices to ensure they contain all required information. |
| **Completion Timeframe:** 11/30/2023 |
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| **Improvement Area 3** |
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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 although the district has a restraint prevention and behavior support policy (JKAA) and procedures (JKAA-P), these do not include procedures for: * Engaging parents and youth in discussions about restraint prevention and use;
* Receiving and investigating complaints;
* Periodic review of data and documentation on the program's use of restraint;
* Reporting requirements;
* Use of time-out; and
* Providing both oral and written notification to the parent.
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| **LEA Outcome:** The district’s restraint prevention and behavior support procedures will include: * Engaging parents and youth in discussions about restraint prevention and use;
* Receiving and investigating complaints;
* Periodic review of data and documentation on the program's use of restraint;
* Reporting requirements;
* Use of time-out; and
* Providing both oral and written notification to the parent.
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| **Action Plan:** By May 9, 2023, the district will submit revised restraint prevention and behavior support procedures prior to seeking approval from the school committee. By October 6, 2023, the district will submit evidence demonstrating school committee approval of the revised procedures. By October 6, 2023, the district will submit evidence (agenda, signed attendance sheets, training materials) that all staff have received training on the updated restraint prevention and behavior support procedures. |
| **Success Metric:** By October 2023 and beyond, the district's restraint prevention and behavior support procedures will be consistent with 603 CMR 46.00. Additionally, all district staff will be trained annually on the physical restraint prevention and behavior support policy and procedures. Evidence: * Revised restraint prevention and behavior support procedures
* School committee minutes indicating approval
* Attendance sheets, agendas, and training materials
 |
| **Measurement Mechanism:** The Director of Pupil Personnel Services and School Committee Policy Chairperson will annually review the restraint prevention and behavior support policy (JKAA) and procedures (JKAA-P) for consistency with the current regulations. All staff will be trained annually as required by 603 CMR 46.00. |
| **Completion Timeframe:** 10/06/2023 |