

# Bedford Public SchoolsINTEGRATED MONITORING REVIEW REPORT

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

**Dates of Onsite Visit:** **February 3-4, 2025**

**Date of Report: June 23, 2025**

**Corrective Action Plan Due: July 22, 2025**

**Department of Elementary and Secondary Education Onsite Team Members:**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**INTEGRATED MONITORING REVIEW REPORT**

**Bedford Public Schools**

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**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**OFFICE OF PUBLIC SCHOOL MONITORING**

INTEGRATED MONITORING REVIEW REPORT INTRODUCTION

During the 2024-2025 school year, Bedford Public Schools participated in an Integrated Monitoring Review (IMR) conducted by the Department of Elementary and Secondary Education’s (DESE or Department) Office of Public School Monitoring (PSM). The purpose of the Integrated Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

**Components of the Integrated Monitoring Review**



Integrated Monitoring is one of eight components of a state’s general supervision system. One aspect of Integrated Monitoring is the Integrated Monitoring Review. Each school district, charter school, vocational school, and virtual school undergoes an Integrated Monitoring Review every three years. The Department’s Office of Public School Monitoring (PSM) is responsible for conducting these reviews and works closely with offices throughout the Department including, but not limited to, the Office of Special Education Planning and Policy (SEPP), Problem Resolution System Office (PRS), and the Office of Approved Special Education Schools (OASES) to promote cohesion and collaboration across the Department’s general supervision system. As set forth in the diagram above, Integrated Monitoring Review is one of the multilayered, cohesive, and formal processes employed by the Department to examine and evaluate all LEAs’ implementation of IDEA with a particular emphasis on educational results, functional outcomes, and compliance.

The monitoring cycle is posted at [Integrated Monitoring Review Three Year Cycle](https://www.doe.mass.edu/psm/integrated/3year-cycle.docx).

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 Focused Standards, which are reviewed if the Department deems appropriate due to concerns with those particular standards. In those circumstances, the identified Focused Standards are assessed in addition to the Universal Standards.

Universal Standards and Focused Standards are aligned with the following regulations:

**Special Education (SE)**

* Selected requirements from the federal Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1400 *et seq* and accompanying regulations at 34 CFR Part 300.
* Massachusetts General Law Chapter 71B, and the Massachusetts Special Education regulations (603 CMR 28.00).

**Civil Rights Methods of Administration and Other General Education Requirements (CR)**

* Specific 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 select state requirements under M.G.L. c. 76, § 5 and M.G.L. c. 269 §§ 17 through 19.
* Specific requirements from the Massachusetts Physical Restraint regulations (603 CMR 46.00).
* Specific requirements from the Massachusetts Student Learning Time regulations (603 CMR 27.00).
* Specific requirements from the Massachusetts Student Records regulations (603 CMR 23.00).
* Various requirements under other federal and state laws and regulations.

**Integrated Monitoring Review Process:**

**Discovery:** During the Discovery stage, the PSM chairperson analyzes data and information to prepare for the onsite visit. The chairperson also reviews documents submitted by the district.

**Engagement:** The Engagement stage of the Integrated Monitoring Review includes all activities conducted onsite and/or virtually through the issuance of the Integrated Monitoring Review Report. Such activities may include record review, interviews, and observations.

**Close-out:** Once the Report is issued, the Close-out stage begins for the districts with any identified findings of noncompliance. The Close-out stage includes the development of the Correction Action Plan and completion of subsequent progress reports to ensure all instances of noncompliance are resolved within one year of the issuance of the Integrated Monitoring Review Report.

**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.

**Report for Integrated Monitoring Reviews:**

The Integrated Monitoring Review Report will be issued within approximately 30 days of the conclusion of the onsite visit.

**Pre-finding Corrections:**

During the Discovery and Engagement stages of the review, PSM staff may find that the district violated an IDEA requirement prior to the issuance of a finding in the Integrated Monitoring Review Report. In such cases, PSM staff may implement the pre-finding correction protocol. If PSM staff verify that the identified noncompliance is resolved prior to the issuance of the report, no finding is made. However, a list of any pre-finding corrections will be included in the Integrated Monitoring Review Report. More information regarding the pre-finding correction protocol can be found in the PSM procedures at <https://www.doe.mass.edu/psm/procedures.docx>.

**Ratings:** In the Integrated Monitoring Review Report, the onsite team gives a rating for each compliance criterion it has reviewed; those ratings are “Commendable,” “Implemented,” “Implementation in Progress,” “Partially Implemented,” “Not Implemented,” “Not Applicable,” and “Prior Noncompliance - Corrective Action Under Review.”

The onsite team includes a comment in the Integrated Monitoring Review Report for each criterion that it rates “Commendable,” “Partially Implemented,” “Not Implemented,” or “Prior Noncompliance - Corrective Action Under Review,” explaining the basis for the rating.

**Corrective Action:** Where criteria are found “Partially Implemented” or “Not Implemented,” a corrective action plan (CAP) is developed to bring those areas into compliance with the relevant statutes and regulations. Department staff work with districts on the development of an appropriate CAP.

PSM staff also provide ongoing technical assistance as the district is implementing the approved CAP. **School districts 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 Final Monitoring Report.**

Where criteria are rated “Prior Noncompliance - Corrective Action Under Review,” the district will work with staff from the specific Department office that identified the noncompliance to develop a corrective action plan.

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

## INTEGRATED MONITORING REVIEW DETAILS

 **for** **Bedford Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted an Integrated Monitoring Review in Bedford Public Schools during the week of February 3, 2025, 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 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:

**District Civil Rights Self-Assessment Phase**

* Review of civil rights documentation for required elements including document uploads.
* Upon completion, the civil rights self-assessment was submitted to the Department for review.

**Discovery Phase:**

* District review of student records related to the Indicator Data Collection for Indicators 11, 12, and 13.
* Upon completion, the results of the Indicator Data Collection for Indicators 11, 12, and 13 were submitted to the Department for review.
* Review of key data points focused on educational results and functional outcomes. For more details regarding the data review, please see the PSM procedures at <https://www.doe.mass.edu/psm/procedures.docx>.

**Engagement Phase:**

* Interviews of administrative, instructional, and support staff consistent with those criteria selected for onsite verification.
* Interviews of special education parent advisory council (SEPAC) representatives and other telephone interviews, as requested by other parents or members of the general public.
* 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 the district’s special education student roster. The onsite team conducted this review, using standard Department procedures, to determine whether procedural and programmatic requirements were met.
* Observations of time-out rooms.

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| The Integrated Monitoring Review 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," “Implementation in Progress”, and “Prior Noncompliance - Corrective Action Under Review.” (Refer to the “Definition of Compliance Ratings” section of the report.) 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/schools 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. |
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| **Prior Noncompliance - Corrective Action Under Review** | A finding of noncompliance was made by another office in the Department and the school/district is currently undergoing corrective action activities. |
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| **Not Applicable**  | The requirement does not apply to the school district or charter school. |

**Bedford 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 5, SE 6, SE 7, SE 9, SE 9A, SE 10, SE 11, SE 12, SE 14, SE 17, SE 18A, SE 18B, 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 42, SE 43, SE 44, SE 45, SE 46, SE 47, SE 48, SE 49 | CR 13, CR 14, CR 18 |
| **PARTIALLY****IMPLEMENTED** | SE 8, SE 13 |  |
| **NOT** **APPLICABLE** | SE 38 |  |
| **NOT** **IMPLEMENTED** | None |  |

## SUMMARY OF PRE-FINDING CORRECTIONS

The pre-finding correction protocol was implemented prior to the issuance of the Integrated Monitoring Report and all instances of noncompliance were resolved by the district. Evidence of correction was reviewed and verified by the Department for the following criteria:

**SE 9:** Timelines for determination of eligibility

**SE 18:** Determination of placement; provision of IEP to parent

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 Department’s analysis regarding these Indicators are as follows:

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

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| SPECIAL EDUCATION **LEGAL STANDARDS,** **COMPLIANCE RATINGS AND** **FINDINGS** |

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| **CRITERION****NUMBER** |       |
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|  | **Legal Standard** |
| **SE 8** | IEP Team composition and attendanceThe following persons are members of the IEP Team and may serve in multiple roles:1. The student's parents.
2. A representative of the school district who acts as Chairperson and who is (1) qualified to supervise or provide special education; (2) is knowledgeable about the general curriculum; and (3) is knowledgeable about the availability of resources of the district.
3. A representative of the school district who has the authority to commit the resources of the district (and who may act as the Chairperson).
	1. If the student *may* be involved in a regular education program, a regular education teacher. If the student *is* involved in a regular education program, a regular education teacher of the student.
	2. If the student is participating in a special education program, a special education teacher of the student or, if appropriate, a special education provider for the student.
4. The student, if one purpose of the meeting is to discuss transition services or if otherwise appropriate and if he/she chooses.
5. Other individuals at the request of the student's parents.
6. An individual who is qualified to interpret the instructional implications of evaluation results, who may be any one of the persons identified in parts 2 - 4 above.
7. Other individuals who may be necessary to write an IEP for the child, as determined by the Administrator of Special Education.
8. When one purpose of the Team meeting is to discuss transition services, with the consent of the parent(s) or student who has reached the age of majority, the public agency must invite a representative of any participating agency that is likely to be responsible for providing or paying for transition services.
9. When one purpose of the Team meeting is to discuss placement, a person knowledgeable about placement options is present at the meeting.
10. Members of the Team attend Team meetings unless:
	1. the parent and district agree to use alternative means, such as a video conference or a conference call, for any Team meeting OR
	2. the district and the parent agree, in writing, that the attendance of the Team member is not necessary because the member's area of the curriculum or related services is not being modified or discussed OR
	3. the district and the parent agree, in writing, to excuse a required Team member's participation and the excused member provides written input into the development of the IEP to the parent and the IEP Team prior to the meeting.
 |
|  | State Requirements | Federal Requirements |
|  | 603 CMR 28.02(21). Part 1 of this criterion is related to State Performance Plan Indicator 8. Parts 5, 10, are related to Performance Plan Indicators 13 and 14. (See Massachusetts State Performance Plan (MA SPP) and Annual Performance Reports (MA APR) - Special Education.) | 34 CFR 300.116(a), 300.321, 300.328.See also, in the IDEA 97 regulations, 34 CFR Part 300, Appendix A, to State Question #22 |
|  | **Rating:** |  **Partially Implemented**  | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and staff interviews indicated that when a Team member does not attend the Team meeting, the district does not consistently follow the required procedures, including the following:** *Documenting, in writing, that the district and the parent agree the attendance of the Team member is not necessary because the member's area of the curriculum or related services is not being modified or discussed; or*
* *Documenting, in writing, the district and the parent agree to excuse a required Team member's participation and the excused member provides written input into the development of the IEP to the parent and the IEP Team prior to the meeting.*
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| **CRITERION****NUMBER** |       |
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|  | **Legal Standard** |
| **SE 13** | Progress Reports and content 1. Parents receive reports on the student's progress toward reaching the goals set in the IEP at least as often as parents are informed of the progress of non-disabled students.
2. Progress report information sent to parents includes written information on the student's progress toward the annual goals in the IEP.
3. Where a student's eligibility terminates because the student has graduated from secondary school or exceeded the age of eligibility, the school district provides the student with a summary of his or her academic achievement and functional performance, including recommendations on how to assist the student in meeting his or her postsecondary goals.
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|  | State Requirements | Federal Requirements |
|  | 603 CMR 28.07(3) | 34 CFR 300.305(e)(3); 300.320(a)(3) |
|  | **Rating:** |  **Partially Implemented**  | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of student records and staff interviews indicated that progress reports sent to parents do not consistently include written information on the student's progress towards the annual goals in the IEP.* |

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| This Integrated Monitoring Review Report is also available at:<https://www.doe.mass.edu/psm/tfm/reports/>.Profile information supplied by each charter school and school district, including information for individual schools within districts, is available at <http://profiles.doe.mass.edu/>. |

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