

# Dracut Public SchoolsINTEGRATED MONITORING REVIEW REPORT

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

**Dates of Onsite Visit:** **March 17-18, 2025**

**Date of Report: July 21, 2025**

**Corrective Action Plan Due: August 18, 2025**

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

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Commissioner of Elementary and Secondary Education

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION**

**INTEGRATED MONITORING REVIEW REPORT**

**Dracut 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, Dracut 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 [procedures.docx](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.doe.mass.edu%2Fpsm%2Fintegrated%2Fprocedures.docx&wdOrigin=BROWSELINK)

**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 and charter schools on the development of an appropriate CAP.

PSM staff also provide ongoing technical assistance as the district is implementing the approved 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 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

**Dracut Public Schools**

The Massachusetts Department of Elementary and Secondary Education conducted an Integrated Monitoring Review in Dracut during the week of March 17, 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 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 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 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. |
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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. |

**Dracut 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 8, SE 9, SE 9A, SE 10, SE 11, SE 12, SE 13, SE 14, SE 17, SE 18A, SE 19, SE 20, SE 22, SE 25, SE 26, SE 29, SE 34, SE 35, SE 37, SE 38, SE 39, SE 41, SE 42, SE 43, SE 44, SE 45, SE 46, SE 47, SE 48, SE 49 | CR 13, CR 14 |
| **PARTIALLY****IMPLEMENTED** | SE 18B, SE 40 |  |
| **NOT** **IMPLEMENTED** | None |  |
| **NOT APPLICABLE** | None |  |
| **PRIOR NONCOMPLIANCE -****Corrective Action Under****Review** | CR 18 |  |

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 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:

**Transfer of parental rights at the age of majority SE 7**

**IEP Team composition and attendance SE 8**

**Procedures used to provide services to eligible students enrolled in private schools at private expense SE 39**

**Procedures for recording suspensions SE 44**

## 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 18B | Determination of placement; provision of IEP to parent1. At the Team meeting, after the IEP has been fully developed, the Team determines the appropriate placement to deliver the services on the student's IEP.
2. Unless the student's IEP requires some other arrangement, the student is educated in the school that he or she would attend if the student did not require special education.
3. The decision regarding placement is based on the IEP, including the types of related services that are to be provided to the student, the type of settings in which those services are to be provided, the types of service providers, and the location at which the services are to be provided.
4. Reserved.
5. Immediately following the development of the IEP, the district provides the parent with two (2) copies of the proposed IEP and proposed placement along with the required notice, except that the proposal of placement may be delayed according to the provisions of 603 CMR 28.06(2)(e) in a limited number of cases.
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|  | State Requirements | Federal Requirements |
|  | 603 CMR 28.05(6) and (7); 28.06(2) | 34 CFR 300.116; 300.325 |
|  | **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 the district does not consistently issue the proposed IEP and proposed placement to the parent immediately following the development of the IEP.* |

| **CRITERION****NUMBER** |       |
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|  | **Legal Standard** |
| **SE 40** | Instructional grouping requirements for students aged five and older1. The size and composition of instructional groupings for eligible students receiving services outside the general education classroom are compatible with the methods and goals stated in each student's IEP.
2. Instructional grouping size requirements are maximum sizes and the school district exercises judgment in determining appropriate group size and supports for smaller instructional groups serving students with complex special needs.
3. When eligible students are assigned to instructional groupings outside of the general education classroom for 60% or less of the students' school schedule, group size does not exceed
	1. 8 students with a licensed special educator,
	2. 12 students if the licensed special educator is assisted by 1 aide, and
	3. 16 students if the licensed special educator is assisted by 2 aides
4. For eligible students served in settings that are substantially separate, serving solely students with disabilities for more than 60% of the students' school schedule, the district provides instructional groupings that do not exceed
	1. 8 students to 1 licensed special educator, or
	2. 12 students to 1 licensed special educator and 1 aide.
5. After the school year has begun, if instructional groups have reached maximum size as delineated in paragraphs 3 and 4 of this criterion, the administrator of special education and the licensed special educator(s) providing services in an instructional group may decide to increase the size of an instructional grouping by no more than 2 additional students if the additional students have compatible instructional needs and then can receive services in their neighborhood school.
6. In such cases, the administrator provides written notification to the Department and the parents of all group members of the decision to increase the instructional group size and the reasons for such decision. Such increased instructional group sizes are in effect only for the year in which they are initiated.
7. The district takes all steps necessary to reduce the instructional groups to the sizes outlined in paragraph 3 or 4 of this criterion for subsequent years. Such steps are documented by the district.
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|  | State Requirements | Federal Requirements |
|  | 603 CMR 28.06(6) |  |
|  | **Rating:** |  **Partially Implemented**  | **District Response Required:** | **Yes** |

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| **Department of Elementary and Secondary Education Findings:** |
| *A review of documents and staff interviews indicated that three instructional groupings are not staffed by a licensed special educator.* |

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| **CIVIL RIGHTS** **METHODS OF ADMINISTRATION (CR)** **AND** **OTHER RELATED GENERAL EDUCATION REQUIREMENTS****LEGAL STANDARDS,** **COMPLIANCE RATINGS AND** **COMMENTS** |

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| **CRITERION****NUMBER** | CIVIL RIGHTS METHODS OF ADMINISTRATION (CR)AND OTHER RELATED GENERAL EDUCATION REQUIREMENTS**VI. FACULTY, STAFF AND ADMINISTRATION** |
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|  | **Legal Standard** |
| **CR 18** | Responsibilities of the school principal1. Instructional support. The principal in each of the district's schools promotes instructional practices responsive to student needs and ensures that adequate instructional support is available within the general education program for students and teachers. Instructional support includes remedial instruction for students, consultative services for teachers, availability of reading instruction at the elementary level, appropriate services for linguistic minority students, and other services consistent with effective educational practices and the requirements of M.G.L. c. 71B, §2. The principal consults with the administrator of special education regarding accommodations and interventions for students. Such efforts and their results are documented and placed in the student record. Additionally, when an individual student is referred for an evaluation to determine eligibility for special education, the principal ensures that documentation on the use of instructional support services for the student is provided as part of the evaluation information reviewed by the Team when determining eligibility. The school district does not limit a parent's right to refer a student for timely special education evaluation because the district has not fully explored and/or attempted some or all of the available instructional support programs or other interventions available in general education that may be described in the district's curriculum accommodation plan, including any pre-referral program.
2. Curriculum Accommodation Plan. The principal implements a curriculum accommodation plan developed by the district's general education program to ensure that all efforts have been made to meet the needs of diverse learners in the general education program. The plan assists the regular classroom teacher in analyzing and accommodating diverse learning styles of all children in the regular classroom and in providing appropriate services and support within the general education program including, but not limited to, direct and systematic instruction in reading and provision of services to address the needs of children whose behavior may interfere with learning. The plan includes provisions encouraging teacher mentoring and collaboration and parental involvement. (*The plan may be part of a multi-year strategic plan.)*
3. Early Literacy Screening. Effective July 31, 2023, each school district shall at least twice per year assess each student's reading ability and progress in literacy skills, from kindergarten through at least third grade, using a valid, developmentally appropriate screening instrument approved by the Department. Consistent with section 2 of chapter 71B of the general laws and the Department's dyslexia and literacy guidelines, if such screenings determine that a student is significantly below relevant benchmarks for age-typical development in specific literacy skills, the school shall determine which actions within the general education program will meet the student's needs, including differentiated or supplementary evidence-based reading instruction and ongoing monitoring of

progress. Within 30 school days of a screening result that is significantly below the relevant benchmarks, the school shall inform the student's parent or guardian of the screening results and the school's response and shall offer them the opportunity for a follow-up discussion.1. Coordination with special education. The principal, with the assistance of the administrator of special education, coordinates the delivery and supervision of special education services within each school building.
2. Educational services in home or hospital. Upon receipt of a physician's written order verifying that any student enrolled in a public school or placed by the public school in a private setting must remain at home or in a hospital on a day or overnight basis, or any combination of both, for medical reasons and for a period of not less than fourteen school days in any school year, the principal arranges for provision of educational services in the home or hospital. Such services are provided with sufficient frequency to allow the student to continue his or her educational program, as long as such services do not interfere with the medical needs of the student. The principal coordinates such services with the Administrator for Special Education for eligible students. Such educational services are not considered special education unless the student has been determined eligible for such services, and the services include services on the student's IEP.
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|  | M.G.L. c. 71, § 38Q 1/2; 603 CMR 28.03(3); 603 CMR 28.03(1)(f) |
|  | **Rating:** | **Prior Noncompliance: Corrective Action Under Review**  | **District Response Required:** | **No** |

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| **Department of Elementary and Secondary Education Comments:*****Prior Noncompliance – Corrective Action Under Review****: During the 2024-2025 monitoring review conducted by the Office of Language Acquisition (OLA), it was determined that the school does not consistently provide appropriate services for linguistic minority students. In March 2025, OLA issued an ELE 5 finding that included the following:** *The district does not have enough ESL staff to implement its ELE program with fidelity.*
* *The district does not implement an ESL curriculum to ensure students at all grades and proficiency levels become English proficient at a rapid pace.*

*Corrective action for the ELE 5 finding will be reviewed and approved by the Office of Language Acquisition (OLA) through the Continuous Improvement and Monitoring Plan (CIMP).* |

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| This Special Education and Civil Rights Final 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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| Last Revised on:  | July 18, 2025 |
| Prepared by: | AP/AM/JB |