

**Holliston Public Schools**

**Tiered Focused Monitoring Report**

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

**Tier Level** **2**

**Dates of Onsite Visit:** **December 9 & 10, 2019**

**Date of Final Report:** **March 10, 2020**



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Commissioner of Elementary and Secondary Education

During the 2019-2020 school year, Holliston Public Schools participated in a Tiered Focused Monitoring Review conducted by the Department’s Office of Public School Monitoring. The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on special education and civil rights.

Districts and charter schools are reviewed every three years through Tiered Focused Monitoring. This review process emphasizes elements most tied to student outcomes and alternates the focus of each review on either Group A Universal Standards or Group B Universal Standards.

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

In addition, the Department has reserved a specific set of criteria, collectively known as Targeted Standards, employed when LEA or school-level risk assessment data indicate that there is a potential issue. 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 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.

Tiered Focused Monitoring allows for differentiated monitoring based on a district/charter school’s level of need, the Tiers are defined as follows:

LEAs in Tiers 1 and 2 have been determined to have no or low risk:

* Tier 1/Self-Directed Improvement: Data points indicate no concern on compliance and performance outcomes – meets requirements.
* Tier 2/Directed Improvement: No demonstrated risk in areas with close link to student

outcomes – low risk.

LEAs in Tiers 3 and 4 have demonstrated greater risk:

* Tier 3/Corrective Action: Areas of concern include both compliance and student

outcomes – moderate risk.

* Tier 4/Cross-unit Support and Corrective Action: Areas of concern have profound effect on student outcomes and ongoing compliance – high risk.

The phases of Tiered Focused Monitoring for Holliston Public Schools included:

Self-Assessment Phase:

* District reviewed special education and civil rights documentation for required elements including document uploads.
* Upon completion of this internal review, the district’s self-assessment was submitted to the Department for review.

On-site Verification Phase:

* Review of additional documents for special education and civil rights.
* Surveys of parents of students with disabilities: Parents of students with disabilities were sent a survey to solicit information regarding their experiences with the district’s implementation of special education programs, related services, and procedural requirements.
* Interviews of staff consistent with those criteria selected for onsite verification.
* Interview of a parent advisory council (PAC) representative and other telephone interviews, as requested, by other parents.
* Observations of classrooms and other facilities: The onsite team visited a sample of classrooms and school facilities used in the delivery of programs and services to determine general levels of compliance with program requirements.

**Report: For Tier 1 & 2 Tiered Focused Monitoring Reviews**

Following the onsite visit, the onsite team holds an informal exit meeting to summarize its comments for the superintendent or charter school leader. Within approximately 20 business days of the onsite visit, the onsite chairperson forwards to the superintendent or charter school leader the findings from the Tiered Focused Monitoring Review. All districts/charter schools in Tiers 1 and 2, as part of the reporting process, 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 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. Districts and charter schools are expected to incorporate the CIMP actions into their district and school improvement plans, including their professional development plans.

# **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. |
| **Implemented** | The requirement is substantially met in all important aspects. |
| **Implementation in Progress** | This rating is used for criteria containing new or updated legal requirements and means that 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. |
| **Partially Implemented** | The requirement, in one or several important aspects, is not entirely met. |
| **Not Applicable** | The requirement does not apply to the school district or charter school. |

**Holliston 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 15, SE 35, SE 36,  SE 50, SE 52, SE 52A,  SE 54, SE 55 | CR 3, CR 7, CR 7A, CR 7B, CR 7C, CR 10A, CR 10B, CR 10C, CR 12A, CR 16,  CR 20, CR 21, CR 22, CR 23 |
| **PARTIALLY**  **IMPLEMENTED** | SE 32, SE 51, SE 56 | CR 17A, CR 24, CR 25 |
| **NOT**  **IMPLEMENTED** |  |  |

The Tiered Focused Monitoring Toolkit, which includes the regulatory requirements specific to the special education and civil rights criteria referenced in the table above, can be found at <http://www.doe.mass.edu/psm/resources/default.html>.

| **Improvement Area** **1** |
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| **Criterion:** SE 32 - Parent advisory council for special education |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews and a review of documents indicated that the parent advisory council for special education duties do not include advising the district on matters that pertain to the education and safety of students with disabilities and meeting regularly with school officials to participate in the planning and evaluation of the school district's special education programs. |
| **LEA Outcome:** Holliston Public Schools will ensure that the district-wide parent advisory council for special education (SEPAC) advises the district on matters that pertain to the education and safety of students with disabilities and meets regularly with school officials to participate in the planning and evaluation of the school district's special education programs. |
| **Action Plan:** By April 15, 2020, the Director of Student Services (or designee) will identify specific dates to meet with the SEPAC to discuss matters that pertain to the education and safety of students with disabilities and provide an opportunity for SEPAC participation in the planning and evaluation of the district's special education programs. Evidence will include a list of meeting dates and corresponding topics that must address the education and safety of students and the planning and evaluation of special education programs.  By April 15, 2020, the Director of Student Services will support the SEPAC in amending the by-laws to make clear that the duties of the SEPAC include, but are not limited to, advising the district on matters that pertain to the education and safety of students with disabilities and participating in the planning and evaluation of the school district's special education programs. Evidence will include the revised by-laws.  By June 15, 2020, the Director of Student Services, in collaboration with the SEPAC, will review the Holliston Public Schools IEP Team meeting survey. The district will submit the results of the review and any recommendations to the school committee. Evidence will include the results, recommendations, and any necessary action plans.  By December 15, 2020, the district will submit evidence of ongoing collaboration with the SEPAC in the planning and evaluation of special education programs. Evidence will include meeting agendas and specific programmatic recommendations from the SEPAC. |
| **Success Metric:** By December 2020 and beyond, district administrators will meet regularly with the SEPAC so that members have the opportunity to advise the district on matters that pertain to the education and safety of students with disabilities and participate in the evaluation and planning of special education programs.  **Evidence:**  Director of Student Services and SEPAC meeting dates with corresponding topics  Amended by-laws  IEP Team meeting survey review results with SEPAC recommendations  Special education program evaluation results with SEPAC recommendations  Action plans |
| **Measurement Mechanism:** The Director of Student Services (or designee) will attend monthly SEPAC meetings. District leadership will work with the SEPAC to ensure that plans are in place to provide the SEPAC with the opportunity to advise the district on matters that pertain to the education and safety of students with disabilities and participate in the planning and evaluation of special education programs. The Director of Student Services will provide a clear outline of the SEPAC’s duties and roles at the annual welcome meeting that is co-hosted by the SEPAC. District leadership will work with the SEPAC to ensure the by-laws reflect all duties and roles. These roles and duties will also be shared with the school committee. |
| **Completion Timeframe:** 12/15/2020 |
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| **Improvement Area 2** |
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| **Criterion:** SE 51 - Appropriate special education teacher licensure |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews and a review of documents indicated that not all individuals who design and/or provide direct special education services described in IEPs are appropriately licensed. Specifically, two special education teachers at the elementary level and one special education teacher at the middle school level are not appropriately licensed. |
| **LEA Outcome:** Holliston Public Schools and the Superintendent of Schools will ensure all special education teaching staff who design and/or provide direct special education services described in IEPs are appropriately qualified and licensed. |
| **Action Plan:** By April 15, 2020, the district will submit the internal monitoring process developed to ensure that all special education teachers are appropriately licensed. The process will include periodic review of teacher licensure status.  By April 15, 2020, special education teachers identified by the Department will receive communication from the superintendent notifying them that their qualifications and licensure must match their current teaching position in the district. Evidence will include a copy of the notification and any updated license or waiver information.  By May 15, 2020, special education teachers on approved waivers will receive support from building administrators and the superintendent to complete the necessary steps for licensure. Evidence will include individual teacher support plans.  By June 15, 2020, the district will submit valid licenses and/or approved waivers for the special education teachers identified by the Department. |
| **Measurement Mechanism:** At the beginning of each school year, the district will ensure that returning and newly hired special education teachers are appropriately licensed or have an approved waiver. The superintendent will keep on file the current license status for all special education teachers and conduct periodic reviews to ensure compliance. |
| **Completion Timeframe:** 06/15/2020 |
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| **Improvement Area 3** |
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| **Criterion:** SE 56 - Special education programs and services are evaluated |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews and a review of documents indicated that special education programs and services are not regularly evaluated. |
| **LEA Outcome:** Holliston Public Schools will regularly evaluate special education programs and services. |
| **Action Plan:** By May 15, 2020, the district will develop evaluation protocols to ensure that special education programs are evaluated on annual basis.  By May 15, 2020, the district will develop a calendar for reviewing the continuum of special education programs and services (Transitions, BASIS, Network, therapeutic, language-based, extended school year, preschool, co-teaching, etc.) offered to meet the needs of the special education student population. Evidence will include a copy of the evaluation calendar that indicates the programs and services to be evaluated, the person/role leading the evaluation, and inclusion of the SEPAC.  By July 15, 2020, the district will submit identified data sources and methods of analysis for the program evaluations. Data sources may include, but are not limited to, the following: formal and informal assessment results; classroom observations; and sample IEPs.  By December 15, 2020, the district will submit evidence of implementation of the evaluation review cycle. Evidence will include all evaluation activities, corresponding recommendations and an action plan. The district will identify areas of SEPAC involvement.  By December 15, 2020, the district will share the results of the evaluation, recommendations and action plan with the school committee and SEPAC. Evidence will include school committee and SEPAC agendas and meeting minutes. |
| **Success Metric:** By December 2020 and beyond, the district will conduct a regular review of the district’s special education programs and services.    **Evidence:**  Evaluation protocol  Evaluation calendar/cycle  Evaluation results with SEPAC recommendations  Action plan  School committee and SEPAC agenda and minutes |
| **Measurement Mechanism:** On an annual basis, the district will conduct an evaluation and ensure that the SEPAC is provided with the opportunity to be involved. The district will analyze the results and share recommendations and any actions plans with the school committee, SEPAC, Administrative Council, and the continuum of service professionals. |
| **Completion Timeframe:** 12/15/2020 |
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| **Improvement Area 4** |
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| **Criterion:** CR 17A - Use of physical restraint on any student enrolled in a publicly-funded education program |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents indicated that the district's written restraint prevention and behavior support procedures do not include the following: methods for preventing student violence, self-injurious behavior and suicide; methods for engaging parents and youth in discussions about restraint prevention and use; and a description and explanation of the program's alternatives to physical restraint and method of physical restraint in emergency situations. |
| **LEA Outcome:** Holliston Public Schools’ written restraint prevention and behavior support policy and procedures will be consistent with regulations 603 CMR 46.00 regarding appropriate responses to student behavior that may require immediate intervention. Specifically, the policy and procedures will include the following: methods for preventing student violence, self-injurious behavior and suicide; methods for engaging parents and youth in discussions about restraint prevention and use; and a description and explanation of the program's alternatives to physical restraint and method of physical restraint in emergency situations. |
| **Action Plan:** By April 15, 2020, the district will submit revised written restraint prevention and behavior support policy and procedures consistent with regulations 603 CMR 46.00. Upon Department approval of the revised policy and procedures, the district will present the policy and procedures to the school committee.  By May 15, 2020, the school committee will ratify the Department approved written restraint prevention and behavior support policy and procedures (SC Policy JKAA). Evidence will include the school committee agenda and meeting minutes.  By July 15, 2020, the newly developed and approved written restraint prevention and behavior support policy and procedures will be reviewed at a SEPAC Board meeting. Evidence will include SEPAC agenda and meeting minutes.  By August 31, 2020, the district will post the newly developed and approved policy and procedures manual and update each school handbook as necessary. Evidence will include annual notification to parents and staff and a link to the online policy and procedures.  By October 9, 2020, all staff will be trained on the updated policy and procedures. Evidence will include training materials, agendas and signed attendance sheets. |
| **Success Metric:** Holliston Public Schools’ approved written restraint prevention and behavior support policy and procedures will be consistent with regulations 603 CMR 46.00. The district will annually disseminate the policy and procedures to the school community. All staff will receive the required training related to restraint prevention and behavior support policy and procedures. The policy and procedures will be reviewed annually.  **Evidence:**  Revised restraint prevention and behavior support policy and procedures  School committee agenda and meeting minutes indicating approval  SEPAC agenda and meeting minutes  Dissemination to school community, including a link to online policy and notice to parents  Training materials, agendas, and signed attendance sheets |
| **Measurement Mechanism:** The assistant superintendent will annually review the written restraint prevention and behavior support policy and procedures to ensure compliance, as well as review the means of dissemination to the school community. The district will provide and track staff training to ensure all staff are trained within the first month of the school year and for employees hired after the start of the school year, within one month of hire. |
| **Completion Timeframe:** 10/09/2020 |
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| **Improvement Area 5** |
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| **Criterion:** CR 24 - Curriculum review |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews and a review of documents indicated that the district does not ensure individual teachers review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation. Likewise, the district does not ensure that appropriate activities, discussions and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in materials. |
| **LEA Outcome:** The district will ensure that individual teachers review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin, and sexual orientation. The district will also ensure that appropriate activities, discussions and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in materials. |
| **Action Plan:** By May 15, 2020, a subset of central office and building administrators will participate in an in-depth training specific to developing cultural proficiency, diversity, equity and inclusive practices in the learning environment. Evidence will include training materials and signed attendance sheets or course completion certificates.  By August 31, 2020, the district will submit the newly developed procedures, protocols and tools created to ensure individual teacher review of all educational materials and the provision of appropriate activities, discussions and/or supplementary materials, as appropriate.  By September 25, 2020, the district will train all administrators on the newly developed procedures, protocols, and tools. Evidence will include agendas, training materials and signed attendance sheets.  By November 2, 2020, the district will train all teachers and other relevant staff on the newly developed procedures, protocols, and tools. Evidence will include, agendas, training materials and signed attendance sheets.  By December 15, 2020, the district will develop and implement an internal monitoring system that includes administrative oversight of training, classroom observations, and the completion of curriculum review tools by individual teachers. Completed review tools will be collected and reviewed by administrators. Evidence will include a description of the internal monitoring systems and examples of curriculum review tools completed by individual teachers. |
| **Success Metric:** By December 2020 and beyond, all individual teachers in the district will review all educational materials for simplistic and demeaning generalizations, lacking intellectual merit, on the basis of race, color, sex, gender identity, religion, national origin and sexual orientation. In addition, the district will ensure that appropriate activities, discussions and/or supplementary materials are used to provide balance and context for any such stereotypes depicted in materials.  **Evidence:**  Cultural proficiency workshop training materials and attendance sheets  Protocol for individual teacher review  Internal monitoring tools  Administrator and teacher training materials, agenda, and signed attendance sheets  Samples of implemented internal monitoring tools |
| **Measurement Mechanism:** The assistant superintendent will conduct an annual review of protocols and data gathered through the internal monitoring process to identify areas of improvement and ensure ongoing compliance. The assistant superintendent will ensure that all staff is trained on the revised procedures and protocols to ensure ongoing compliance. |
| **Completion Timeframe:** 12/15/2020 |
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| **Improvement Area 6** |
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| **Criterion:** CR 25 - Institutional self-evaluation |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews and a review of documents indicated that the district does not evaluate all aspects of its K-12 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. |
| **LEA Outcome:** The district will evaluate all aspects of its K-12 program annually to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. The district will make changes as are indicated by the evaluation. |
| **Action Plan:** By May 15, 2020, a subset of central office and building administrators will participate in an in-depth training specific to developing cultural proficiency, diversity, equity and inclusive practices in the learning environment. Evidence will include training materials and signed attendance sheets or course completion certificates.  By August 31, 2020, the district will submit the newly developed protocols, procedures and tools created to conduct an annual equal access self-evaluation.  By November 2, 2020, the district will train all administrators and relevant staff members on the procedures, protocols, and tools developed to conduct the annual self-evaluation. Evidence will include training materials, agendas and signed attendance sheets.  By December 15, 2020, the district will conduct a self-evaluation of all aspects of its K-12 program to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. Evidence will include the results of the self-evaluation, identification of needs, targeted root cause analysis, and development of action steps. |
| **Success Metric:** By December 2020 and beyond, the district will evaluate all aspects of its K-12 program to ensure that all students, regardless of race, color, sex, gender identity, religion, national origin, limited English proficiency, sexual orientation, disability, or housing status, have equal access to all programs, including athletics and other extracurricular activities. The district will make changes as are indicated by the evaluation. Going forward, this evaluation will be conducted on an annual basis.  **Evidence:**  Cultural proficiency workshop training materials and attendance sheets  Revised procedures and protocols  Evaluation tools  Administrator and relevant staff training materials, agenda, and signed attendance sheets  Results of the completed annual self-evaluation  Root cause analysis  Action plan |
| **Measurement Mechanism:** The assistant superintendent and the Director of Student Services will lead the district leadership team in the development of protocols, procedures, and tools to conduct the annual self-evaluation. The assistant superintendent will ensure that appropriate training occurs annually for those involved in conducting the self-evaluation. The district leadership team will annually evaluate all aspects of its K-12 program to ensure equal access for all students. As part of the process, areas of need will be identified, and action steps will be taken as indicated by the evaluation. The district leadership team will annually review the protocols, procedures, and tools for the self-evaluation in order to make changes and improve the process. |
| **Completion Timeframe:** 12/15/2020 |
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