

**Norfolk County Agricultural High School**

**Tiered Focused Monitoring Report**

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

**Tier Level** **1**

**Date of Onsite Visit:** **February 27, 2020**

**Date of Final Report:** **June 19, 2020**



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Commissioner of Elementary and Secondary Education

During the 2019-2020 school year, Norfolk County Agricultural High School 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 Norfolk County Agricultural High School included:

Self-Assessment Phase:

* School reviewed special education and civil rights documentation for required elements including document uploads.
* School reviewed a sample of special education student records selected across grade levels, disability categories and levels of need.
* Upon completion of these two internal reviews, the school’s self-assessment was submitted to the Department for review.

On-site Verification Phase:

* Review of student records for special education: The Department selected a sample of student records from those the school 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 are being met.
* Review of additional documents for special education or 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 school’s implementation of special education programs, related services, and procedural requirements.
* Interviews of staff consistent with those criteria selected for onsite verification.
* Interviews of parent advisory council (PAC) representatives and other telephone interviews, as requested by other parents or members of the general public.

**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.

**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 onsite team reviewed the results of Indicator data submissions for Indicators 11, 12 and 13. 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 |  |  |

# **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 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. |
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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. |

**Norfolk County Agricultural High School**

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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|  | **Universal Standards**  **Special Education** | **Universal Standards**  **Civil Rights and Other General Education Requirements** | **Targeted Standards** |
| **IMPLEMENTED** | SE 1, SE 2, SE 3, SE 3A, SE 6,  SE 7, SE 8, SE 9, SE 9A, SE 10, SE 11, SE 12,  SE 13, SE 14,  SE 18A, SE 19, SE 20, SE 22,  SE 25, SE 26,  SE 29, SE 34,  SE 35, SE 40,  SE 41, SE 43,  SE 49 | CR 13, CR 14 | SE 44, SE 45,  SE 46, SE 47 |
| **PARTIALLY**  **IMPLEMENTED** | SE 48 | CR 18 |  |
| **NOT APPLICABLE** | SE 17, SE 37,  SE 38, SE 39,  SE 42 |  |  |

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 48 - Equal opportunity to participate in educational, nonacademic, extracurricular and ancillary programs, as well as participation in regular education |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff and parent interviews indicated that, due to the school's scheduling, not all students with IEPs have an equal opportunity to participate in educational programming. Specifically, some students must miss physical education in order to receive IEP services. Additionally, some high school juniors must choose between taking a science course or taking an Academic Strategies course required by their IEP; while students receive credit for the science course, they do not receive credit for the Academic Strategies course. |
| **LEA Outcome:** NCAHS will fully comply with SE 48. Students with disabilities will have equal opportunity to participate in physical education and wellness. Students who participate in the Academic Strategies course will receive credit for it. 11th grade students with IEPs will have the same opportunity to take science as 11th grade students without IEPs. |
| **Action Plan:** By August 16, 2020, Norfolk County Agricultural High School (NCAHS) will revise the school's master schedule so that:  - students with IEPs will have an equal opportunity to participate in physical education, wellness, 11th grade science and other courses in the general education program; and  - students will receive credit for taking the Academic Strategies course.  By September 30, 2020, NCAHS will create an internal monitoring system to ensure that students with IEPs have equal opportunity to participate in physical education and other courses.  By October 9, 2020, NCAHS will complete a review of schedules of students on IEPs to ensure that:  - students with IEPs are able to participate in physical education and wellness;  - 11th grade students have the same opportunity to participate in science classes as 11th grade students without IEPs; and  - students receive credit for taking Academic Strategies. |
| **Success Metric:** NCAHS will maintain the following evidence to demonstrate success in completing corrective actions and complying with the requirements of SE 48:  - Master schedule without scheduling conflicts, so that students with IEPs have equal access to physical education and other classes in the general education program;  - Course catalog showing that the Academic Strategies course earns credit;  - Results of student record reviews showing students with IEPs are provided with the opportunity to take physical education and other courses in the general education program; and  - Description of the internal monitoring system. |
| **Measurement Mechanism:** The Director of Student Services will implement internal monitoring each semester to ensure that students with IEPs have equal opportunity to participate in physical education and other courses in the general education program. |
| **Completion Timeframe:** 10/09/2020 |
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| **Improvement Area 2** |
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| **Criterion:** CR 18 - Responsibilities of the school principal |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documents and staff interviews indicated that the school has a district curriculum accommodation plan (DCAP). However, the DCAP does not address direct and systematic instruction in reading as required by M.G.L. c. 71, s. 38 Q1/2, and interviews indicated that remedial reading instruction is not available for students. |
| **LEA Outcome:** NCAHS will have a curriculum accommodation plan that ensures all efforts are made to meet the needs of diverse learners in the general education program. The DCAP will address direct and systematic instruction in reading as required by M.G.L. c. 71, s. 38 Q1/2. |
| **Action Plan:** By August 16, 2020, NCAHS will revise the district curriculum accommodation plan to include direct and systematic instruction in reading.  By September 30, 2020, NCAHS will train all staff on the revised curriculum accommodation plan.  By November 14, 2020, NCAHS will implement an internal monitoring and tracking system to ensure that regular education students receive accommodations within the general education setting before being referred by staff for testing.  By February 12, 2021, NCAHS administrators will meet to assess the implementation of the curriculum accommodation plan. |
| **Success Metric:** NCAHS will ensure all efforts have been made to meet the needs of diverse learners in the general education program by utilizing the district curriculum accommodation plan and providing appropriate services and support within the regular education program, including, but not limited to, direct and systematic instruction in reading.  Evidence:  - Revised DCAP  - Agendas, training materials and attendance sheets for trainings  - Results of internal monitoring of initial evaluations for accommodations in general education setting  - Agenda from meeting of administrators |
| **Measurement Mechanism:** Continuing after the completion deadline: Twice a year, NCAHS administrators will assess the implementation of the curriculum accommodation plan. Each semester, the Director of Student Services will review at least two student records where an initial evaluation was conducted to determine if the student received accommodations within the general education setting before being referred by staff for testing. |
| **Completion Timeframe:** 02/12/2021 |
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